

PACHULSKI STANG ZIEHL & JONES LLP  
Jeffrey N. Pomerantz (CA Bar No. 143717)  
John A. Morris (NY Bar No. 2405397)  
Gregory V. Demo (NY Bar No. 5371992)  
Jordan A. Kroop (NY Bar No. 2680882)  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, CA 90067  
Tel: (310) 277-6910

HAYWARD PLLC  
Melissa S. Hayward  
Texas Bar No. 24044908  
MHayward@HaywardFirm.com  
Zachery Z. Annable  
Texas Bar No. 24053075  
ZAnnable@HaywardFirm.com  
10501 N. Central Expy, Ste. 106  
Dallas, Texas 75231  
Tel: (972) 755-7100

*Counsel for the Highland Claimant Trust*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup></p> <p>Reorganized Debtor.</p>	<p>Chapter 11</p> <p>Case No. 19-34054-sgj11</p>
<p>THE DUGABOY INVESTMENT TRUST</p> <p>Appellant,</p> <p>v.</p> <p>HIGHLAND CLAIMANT TRUST,</p> <p>Appellee.</p>	<p>Civil Case No. 3:25-cv-02724-L</p>

<sup>1</sup> Highland’s last four digits of its taxpayer identification number are (8357). The service address for Highland is 6333 E. Mockingbird Ln., Ste 147 #5045, Dallas, TX 75214.



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**APPELLEE’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE RESPONSE**

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The Highland Claimant Trust (the “Claimant Trust”), appellee in the above-captioned appeal (the “Appeal”), hereby submits this *Unopposed Motion for Extension of Time to File Response* (the “Motion”) seeking an extension of the deadline to file its response (the “Response”) to the *Opening Brief* [Docket No. 23] (the “Opening Brief”) filed by The Dugaboy Investment Trust (“Dugaboy” or the “Appellant”) in the Appeal. In support of the Motion, the Claimant Trust states as follows:

**I. BACKGROUND**

1. Dugaboy filed its Opening Brief on March 2, 2026. Dugaboy’s brief is nearly 50 pages long and attaches hundreds of pages of exhibits.

2. The Claimant Trust’s Response is currently due on April 1, 2026 (the “Current Deadline”). *See* FED. R. BANKR. P. 8018(a)(2). The Claimant Trust is mindful of the Court’s prior order concerning the extension of briefing deadlines [Docket No. 20], but due to a number of conflicting obligations and deadlines, it will be difficult for the Claimant Trust to complete its Response by the Current Deadline.

**II. RELIEF REQUESTED**

3. Through this Motion, the Claimant Trust respectfully requests a 30-day extension—to May 1, 2026—to file its Response.

4. Good cause exists for the requested extension. John Morris is the Claimant Trust's lead counsel, having tried every case on the Claimant Trust and Highland Capital Management, L.P.'s ("Highland") behalf during the last six years in the underlying bankruptcy case, including the one that is the subject of this Appeal; he is indispensable to the Claimant Trust's representation. Regrettably, Mr. Morris has numerous and substantial conflicts between now and April, including, among others, (a) opposing Dugaboy's *Motion for Relief from Order and Motion to Vacate*, a 50-page brief filed on February 9, 2026, supported by over 60 exhibits totaling more than 1,000 pages (Case No. 19-34054-sgj11, Docket No. 4513) by which Dugaboy opened a separate challenge to the same Rule 9019 Order that is the subject of this Appeal, and preparing for oral argument on that Motion; (b) taking and defending four depositions (one in an unrelated matter in the Highland bankruptcy case and three in a bankruptcy case pending in the Southern District of New York); (c) conducting a trial in an adversary proceeding in the Highland bankruptcy case (Case No. 19-34054-sgj11, Adv. Pro. No. 25-03055); and (d) completing an investigation of claims against a lender before a court-ordered challenge deadline in a case pending before the Bankruptcy Court in Delaware.

5. In light of these obligations, Mr. Morris would have little time to devote to drafting the Response under the Current Deadline, and the Claimant Trust would

be prejudiced thereby. The requested 30-day extension will provide counsel with sufficient time to prepare the Response.

6. Accordingly, for the foregoing reasons, the Claimant Trust respectfully requests that the Court extend the deadline for the Claimant Trust to file its Response from April 1, 2026 to May 1, 2026.

7. As indicated in the certificate of conference below, Dugaboy is **UNOPPOSED** to the requested extension.

8. The Claimant Trust is not seeking the requested extension for the purpose of delay, but so that justice may be done.

### **III. CONCLUSION**

WHEREFORE, the Claimant Trust respectfully requests that the Court enter an order (a) granting the Motion, (b) extending the deadline for the Claimant Trust to file its Response from April 1, 2026 to May 1, 2026, and (c) granting the Claimant Trust such additional relief as may be just and proper.

*[Remainder of Page Intentionally Blank]*

Dated: March 12, 2026

**PACHULSKI STANG ZIEHL & JONES  
LLP**

Jeffrey N. Pomerantz (CA Bar No. 143717)  
John A. Morris (NY Bar No. 2405397)  
Gregory V. Demo (NY Bar No. 5371992)  
Jordan A. Kroop (NY Bar No. 2680882)  
10100 Santa Monica Blvd., 13th Floor  
Los Angeles, CA 90067  
Telephone: (310) 277-6910  
Facsimile: (310) 201-0760  
E-mail: [jpomerantz@pszjlaw.com](mailto:jpomerantz@pszjlaw.com)  
[jmorris@pszjlaw.com](mailto:jmorris@pszjlaw.com)  
[gdemo@pszjlaw.com](mailto:gdemo@pszjlaw.com)  
[jkroop@pszjlaw.com](mailto:jkroop@pszjlaw.com)

- and -

**HAYWARD PLLC**

/s/ Zachery Z. Annable  
Melissa S. Hayward  
Texas Bar No. 24044908  
[MHayward@HaywardFirm.com](mailto:MHayward@HaywardFirm.com)  
Zachery Z. Annable  
Texas Bar No. 24053075  
[ZAnnable@HaywardFirm.com](mailto:ZAnnable@HaywardFirm.com)  
10501 N. Central Expy, Ste. 106  
Dallas, Texas 75231  
Telephone: (972) 755-7100  
Facsimile: (972) 755-7110

*Counsel for the Highland Claimant Trust*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that, on March 10, 2026, counsel for the Claimant Trust, John A. Morris, corresponded with counsel for Dugaboy, Michael Gaddis, regarding the relief requested in the foregoing Motion. Mr. Gaddis advised Mr. Morris that Dugaboy is **UNOPPOSED** to the relief requested in the Motion.

*/s/ Zachery Z. Annable*  
Zachery Z. Annable

**CERTIFICATE OF COMPLIANCE**

1. This document complies with Fed. R. Bankr. P. 8013(f)(3)(A) because, excluding the portions excluded by Fed. R. Bankr. P. 8015(g), this document contains 585 words.
2. This document complies with Fed. R. Bankr. P. 8015(a)(5) and (6) because it has been prepared using Microsoft Word in a proportionally spaced typeface (Times New Roman), 14-point type (12-point type for footnotes).

/s/ Zachery Z. Annable  
Zachery Z. Annable

**CERTIFICATE OF SERVICE**

I certify that, on March 12, 2026, a copy of the foregoing Motion was served electronically via the Court's CM/ECF system on all parties registered to receive electronic notice in this case.

/s/ Zachery Z. Annable  
Zachery Z. Annable

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup></p> <p style="text-align: center;">Reorganized Debtor.</p>	<p>Chapter 11</p> <p>Case No. 19-34054-sgj1</p>
<p>THE DUGABOY INVESTMENT TRUST</p> <p style="text-align: center;">Appellant,</p> <p>v.</p> <p>HIGHLAND CLAIMANT TRUST,</p> <p style="text-align: center;">Appellee.</p>	<p>Civil Case No. 3:25-cv-02724-L</p>

**ORDER GRANTING APPELLEE’S UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**

Having considered the *Unopposed Motion for Extension of Time to File Response* (the “Motion”)<sup>2</sup> filed by the Highland Claimant Trust (the “Claimant Trust”), the Court finds and concludes that good cause exists to grant the Motion.

**IT IS THEREFORE ORDERED THAT:**

1. The Motion is **GRANTED**.

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<sup>1</sup> Highland’s last four digits of its taxpayer identification number are (8357). The service address for Highland is 6333 E. Mockingbird Ln., Ste 147 #5045, Dallas, TX 75214.

<sup>2</sup> Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.

2. The Claimant Trust is authorized to file its Response on or before May 1, 2026.

**It is so ordered** this \_\_\_\_ day of \_\_\_\_\_, 2026.

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The Honorable Sam A. Lindsay  
United States District Judge