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Counsel for Highland Capital Management, L.P.

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

In re:	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	Case No. 19-34054-sgj11
Reorganized Debtor.	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	Adv. Proc. No. 25-03055-bwo
Plaintiff,	§	
v.	§	
PATRICK HAGAMAN DAUGHERTY,	§	
Defendant.	§	

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



SECOND STIPULATED SCHEDULING ORDER

This second stipulation (the “Stipulation”) is made and entered into by and between plaintiff Highland Capital Management L.P. (“Highland” or the “Debtor”) and defendant Patrick Daugherty (“Daugherty,” and together with Highland, the “Parties”), by and through their respective undersigned counsel, to establish certain deadlines pertaining to the litigation of claims asserted in Highland’s *Complaint for (1) Disallowance of Claim No. 205 in Its Entirety, (2) Estimation of Claim No. 205 for Allowance Purposes, or (3) Subordination of Any Allowed Portion of Claim No. 205 of Patrick Hagaman Daugherty* [Docket No. 1] (the “Complaint”).

RECITALS

WHEREAS, on October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware, Case No. 19-12239 (CSS) (the “Delaware Court”).

WHEREAS, on December 4, 2019, the Delaware Court entered an order transferring venue of the Debtor’s bankruptcy case to the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Court”). Bankr. Docket No. 186.

WHEREAS, on April 1, 2020, Daugherty filed Proof of Claim No. 67 (“Claim 67”), which was superseded and replaced by Proof of Claim No. 77 (“Claim 77”).

WHEREAS, on December 23, 2020, Daugherty filed Proof of Claim No. 205 (the “Claim” or “Claim 205”), which superseded and replaced Claim 77 in its entirety.

WHEREAS, on February 22, 2021, the Court entered the *Order (i) Confirming the Fifth Amended Plan of Reorganization (as Modified) and (ii) Granting Related Relief* [Bankr. Docket No. 1943] (the “Confirmation Order”) which confirmed the *Fifth Amended Plan of Reorganization*

of Highland Capital Management, L.P., as Modified [Bankr. Docket No. 1808] (the “Plan”).

WHEREAS, on December 8, 2021, the Debtor filed *Reorganized Debtor’s Motion for Entry of an Order Approving Settlement with Patrick Hagaman Daugherty (Claim No. 205) and Authorizing Actions Consistent Therewith* [Bankr. Docket No. 3088] (the “Settlement Motion”).

WHEREAS, on March 8, 2022, the Court granted the Settlement Motion [Bankr. Docket No. 3298] (the “Settlement Order”), disallowing Claim 67 and Claim 77 with prejudice and resolving all of Claim 205 other than Daugherty’s Reserved Claim (as defined in the Parties’ *Settlement Agreement* approved by the Settlement Order).

WHEREAS, on May 2, 2025, Highland commenced the Adversary Proceeding by filing the Complaint to disallow, estimate, or subordinate Daugherty’s Reserved Claim.

WHEREAS, on October 1, 2025, the Court entered the *Order Approving Stipulation and Scheduling Order* [Docket No. 37], pursuant to which trial on this matter (the “Trial”) was set for April 8, 2026.

WHEREAS, on February 27, 2026, the Court entered the *Order Resetting Trial Date* [Docket No. 88], pursuant to which the Trial was adjourned to April 17, 2026.

WHEREAS, in light of the adjournment of the Trial from April 8 to April 17, 2026, the Parties stipulated and agreed to adjourn certain related deadlines.

NOW, THEREFORE, it is hereby stipulated and agreed, and upon approval of this Stipulation by the Court, it shall be SO ORDERED:

1. Except with respect to impeachment and rebuttal exhibits and witnesses, witness and exhibit lists will be filed on the docket and served on or before **April 2, 2026**, unless otherwise agreed in writing by the Parties. Objections to exhibits, other than for relevance, shall be filed on or before **April 8, 2026**, or they shall be deemed waived.

2. A joint pretrial order in compliance with the Court’s local rules shall be filed on or before **April 10, 2026**.

3. Any Party wishing to file a trial brief shall file and serve the same on or before **April 13, 2026**.

4. All deadlines set forth above are effective as of **5:00 p.m. (Central Time)** on each applicable date.

5. A one-day evidentiary hearing will be held in person before the Court on **April 17, 2026, beginning at 9:00 a.m. (Central Time)**.

6. If approved by the Court, this Stipulation shall only be modified in a writing signed by the Parties or upon the entry of an order of the Court entered upon notice to the Parties.

7. The Court shall retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.

Dated: March 17, 2026.

GRAY REED

/s/ Andrew K. York

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