

**PATRICK DAUGHERTY’S OBJECTIONS TO
HIGHLAND CAPITAL MANAGEMENT, L.P., WITNESS AND EXHIBIT LIST
WITH RESPECT TO TRIAL TO BE HELD ON APRIL 17, 2026**

Patrick Daugherty (“Daugherty”) submits the following objections to the witness and exhibit list submitted by Highland Capital Management, L.P. (“Highland”), the reorganized debtor in the above- captioned chapter 11 case (the “Bankruptcy Case”) and plaintiff/counter-defendant in the above-captioned adversary proceeding (the “Adversary Proceeding”), with respect to (a) its *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], and (b) *Patrick Daugherty’s Answer to Plaintiff Highland Capital Management, L.P.’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] and *Original Counterclaim* [Docket No. 39], which the Court has set for trial at 9:00 a.m. (Central Time) on April 17, 2026 (the “Trial”) in the Adversary Proceeding.

A. Objections to Witnesses:

1. James P. Seery, Jr.; [No Objection]
2. David Klos; [No Objection]
3. Patrick Daugherty; [No Objection]
4. Trevor Jason Liles-Tims; [No Objection]
5. Any witness identified by or called by any other party;² and
6. Any witness necessary for rebuttal.³

² Daugherty reserves the right to object to other unnamed witnesses, as appropriate and if necessary.

³ Daugherty reserves the right to object to witnesses deemed purportedly “necessary for rebuttal”.

B. Objections to Exhibits:

Number	Exhibit	Objection(s)
1.	<p><i>Patrick Daugherty’s Answer to Plaintiff Highland Capital Management, L.P.’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 [Doc. No. 1] and Original Counterclaim</i></p> <p>[Daugherty Deposition Exhibit H-1]</p>	
2.	<p>Email from John A. Morris dated May 5, 2022 [Daugherty Deposition Exhibit H-2]</p>	
3.	<p>Email from James Seery dated October 19, 2022 [Daugherty Deposition Exhibit H-3]</p>	
4.	<p>Email from John A. Morris dated May 24, 2024 [Daugherty Deposition Exhibit H-4]</p>	
5.	<p>Settlement Agreement dated November 22, 2021 [Daugherty Deposition Exhibit H-5]</p>	
6.	<p><i>Patrick Daugherty’s Amended Answers to Highland Capital Management, L.P.’s Requests for Admission</i> dated December 12, 2025 [Daugherty Deposition Exhibit H-6]</p>	
7.	<p><i>Patrick Daugherty’s Amended Answers to Highland Capital Management, L.P.’s Interrogatories</i> dated December 12, 2025 [Daugherty Deposition Exhibit H-7]</p>	
8.	<p>Second Amended and Restated Agreement of Limited Partnership of Highland Capital Management, L.P. dated February 24, 2004 [Daugherty Deposition Exhibit H-8]</p>	
9.	<p>First Amendment to the Second Amended and Restated Agreement of Limited Partnership of Highland Capital Management, L.P. dated April 15, 2006 [Daugherty Deposition Exhibit H-9]</p>	

Number	Exhibit	Objection(s)
10.	Second Amendment to the Second Amended and Restated Agreement of Limited Partnership of Highland Capital Management, L.P. dated April 15, 2007 [Daugherty Deposition Exhibit H-10]	
11.	Amended Employment Agreement (Patrick Daugherty) dated December 31, 2004 [Daugherty Deposition Exhibit H-11]	
12.	Daugherty resignation letter dated September 28, 2011 [Daugherty Deposition Exhibit H-12]	
13.	Patrick Daugherty Comprehensive Compensation and Benefits Statement dated February 27, 2009 [Daugherty Deposition Exhibit H-13]	
14.	Schedule K-1 Form 1065 for Calendar year 2008 for Patrick Daugherty [Daugherty Deposition Exhibit H-14]	
15.	Highland Capital Management Form 4605-A for Period Ending December 31, 2008 [Daugherty Deposition Exhibit H-15]	
16.	Letter from Brian Collins to Patrick Daugherty dated February 3, 2018 [Daugherty Deposition Exhibit H-16]	
17.	Form 886-Z for Patrick Daugherty for Taxable Year Ended December 31, 2008 [Daugherty Deposition Exhibit H-17]	
18.	Form 870-PT (Patrick Daugherty) for Tax Years Ended December 31, 2008 [Daugherty Deposition Exhibit H-18]	
19.	Email From Brian Collins dated July 3, 2018 [Daugherty Deposition Exhibit H-19]	
20.	Email From Brian Collins dated December 9, 2019 [Daugherty Deposition Exhibit H-20]	
21.	May 31, 2024 letter from Hunton to IRS Appeals [HUNTON_000079]	FRE 802 - Hearsay
22.	February 28, 2025 letter from Hunton to IRS Appeals [HUNTON_001105]	

Number	Exhibit	Objection(s)
23.	Form 886-A (Explanation of Items) Exhibit FP-01 [HUNTON_001131]	
24.	Form 886-A (Explanation of Items) Exhibit FP-02 [HUNTON_001163]	
25.	Form 886-A (Explanation of Items) Exhibit FP-03 [HUNTON_001170]	
26.	May 2024 email from IRS to Hunton [HUNTON_001120]	FRE 802 - Hearsay
27.	June 2024 email from IRS to Hunton [HUNTON_000076]	FRE 802 - Hearsay
28.	TMP 60-day letter [HUNTON_001124]	
29.	Statutory Internal Revenue Code Guidance Rev. Ruling 2020-28	FRE 802 - Hearsay
30.	Statutory Internal Revenue Code Guidance IRC section 6662 – Imposition of penalties	FRE 802 - Hearsay
31.	Statutory Internal Revenue Code Guidance IRC section 6601 – Interest on underpayment	FRE 802 - Hearsay
32.	Statutory Internal Revenue Code Guidance IRC section 6621 – Determination of interest rate	FRE 802 - Hearsay
33.	Statutory Internal Revenue Code Guidance IRC section 6622 – Interest compounded daily	FRE 802 - Hearsay
34.	Statutory Internal Revenue Code Guidance IRC section 6651 – Failure to pay tax	FRE 802 - Hearsay
35.	2008 Form 1040 (US Individual Income Tax Return) Pat and Kimberly Daugherty [PDADV_010268]	
36.	2008 Form 1045 (Application for Tentative Refund) Pat and Kimberly Daugherty [PDADV_010262]	
37.	Various, including Draft 2008 HCMLP Schedule K-1 to Pat Daugherty [PDADV_010244]	

Number	Exhibit	Objection(s)
38.	Email chain from September 2011 between Daugherty and Dondero [PDADV_004224]	
39.	Powerpoint slides to partners [PDADV_000002]	
40.	Dondero to Daugherty email Oct 2011 with separation agreement attached [PDADV_018494]	
41.	Separation agreement attached to Dondero to Daugherty email – Oct 2011 [PDADV_018476]	
42.	Email from Daugherty to Collins February 13, 2018 [PDADV_004796]	
43.	July 14, 2014 Final Judgment	FRE 401/402 – Relevance; FRE 403 Confusion of Issues
44.	Copy of Jury Verdict (Feb 2014)	FRE 401/402 – Relevance; FRE 403 Confusion of Issues
45.	Daugherty’s Original Answer, Counterclaim and Third-Party Petition (May 2012)	FRE 401/402 – Relevance; FRE 403 Confusion of Issues
46.	Order on motion to partially vacate final judgment	FRE 401/402 - Relevance
47.	Draft TL QA email [DAUGHERTY ROGS01403110]	FRE 401/402 – Relevance
48.	Letter Agreement re Partnership Interest dated December 31, 2004 [DAUGHERTY ROGS01404488]	
49.	Claimant Trust Agreement dated August 11, 2021	
50.	Email Highland: Daugherty Settlement (RCP Track Record) [DAUGHERTY ROGS00016698]	

Number	Exhibit	Objection(s)
51.	10/24/22 email from Romey (Fwd. Daugherty Settlement Agreement Follow-Up)	
52.	4/1/22 email from JAM (Fwd. HERA and ERA Transfer Documents (execution versions))	
53.	Gray Reed letter Jan 2024 [PDADV_008361]	
54.	Morris email to York Mar 2024 [PDADV_008363]	
55.	Emails between Daugherty and Seery Oct 2022 [PDADV_010229]	
56.	IRS notice April 2018 [PDADV_010999] - CONFIDENTIAL	
57.	Deposition Transcript T.J. Liles-Tims March 23, 2026	Fed. R. Civ. P. 32
58.	Weaver.com – T.J. Liles-Tims Profile	
59.	Expert Report of T.J. Liles-Tims dated February 13, 2026	
60.	Email from J. Dondero to P. Daugherty dated September 27, 2011 [PDADV_004224]	
61.	Protest letter July 2018 [HUNTON_001182]	FRE 802 - Hearsay
62.	HR spreadsheet [DAUGHERTY ROGS01403106]	
63.	Email from J. Seery dated October 24, 2022 [PDADV_018426]	
64.	Any document entered or filed in Highland Capital Management, L.P.’s chapter 11 Bankruptcy Case or any associated adversary proceeding, including any exhibits thereto	Daugherty reserves objections until any such documents are offered

Number	Exhibit	Objection(s)
65.	All exhibits necessary for impeachment and/or rebuttal purposes	Daugherty reserves objections until any such documents are offered
66.	All exhibits identified by or offered by any other party at the Trial	

Daugherty reserves all objections to a witness's lack of personal knowledge regarding any of the exhibits that are attempted to be used with the witness.

Daugherty also reserves the right to amend or supplement his objections to Highland's witness and exhibit list.

Respectfully submitted this 8th day of April 2026.

GRAY REED

By: /s/ Andrew K. York
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Counsel to Patrick Daugherty

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing instrument was served on all Parties or counsel of record herein on this 8th day of April 2026, via the CM/ECF system and/or email.

/s/ Andrew K. York
ANDREW K. YORK