

Jason S. Brookner (Texas Bar No. 24033684)
Andrew K. York (Texas Bar No. 24051554)
Joshua D. Smeltzer (Texas Bar No. 24113859)
J. Reid Burley (Texas Bar No. 24109675)
Drake M. Rayshell (Texas Bar No. 24118507)
GRAY REED
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: jbrookner@grayreed.com
dyork@grayreed.com
jsmeltzer@grayreed.com
rburley@grayreed.com
drayshell@grayreed.com

Counsel to Patrick Daugherty

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

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹
Reorganized Debtor.

§
§ Chapter 11
§
§ Case No. 19-34054 (BWO)
§
§
§

HIGHLAND CAPITAL MANAGEMENT, L.P.,
Plaintiff,

v.

PATRICK HAGAMAN DAUGHERTY,
Defendant.

§
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§
§
§ Adversary No. 25-03055
§
§
§
§
§

¹ Highland’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for Highland is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



PATRICK DAUGHERTY’S AMENDED WITNESS AND EXHIBIT LIST

Defendant and Counter-Plaintiff Patrick Daugherty files this Amended Witness and Exhibit List for Trial scheduled on April 17, 2026, at 9:00 a.m.

Witnesses

1. Patrick Daugherty
2. James Seery
3. T.J. Liles-Tims
4. Any witnesses called or designated by any other party;
5. Any witnesses necessary for impeachment, depending on the witnesses and evidence presented by other parties; and
6. Any witnesses necessary for rebuttal, depending on the witnesses and evidence presented by the parties.

Daugherty reserves the right to cross-examine any witness called by any other party.

Exhibits

Daugherty designates the following exhibits:

| EXHIBIT NUMBER | DESCRIPTION | NOTES |
|----------------|---|-------|
| PD-1 | 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 in Adversary Proceeding No. 25-03055-sgj, <i>Highland Capital Management, L.P. v. Patrick Hagaman Daugherty</i> (Docket No. 1) | |
| PD-2 | Reorganized Debtor’s Motion for Entry of an Order Approving Settlement with Patrick Hagaman Daugherty (Claim No. 205) and Authorizing Actions Consistent Therewith (Main Case Docket No. 3088 in Case 19-34054-sgj) | |
| PD-3 | Declaration of John A. Morris in Support of the Reorganized Debtor’s Motion for Entry of An Order Approving Settlement with Patrick Hagaman Daugherty (Claim No. 205) and Authorizing Actions Consistent Therewith (Main Case Docket No. 3089 in Case 19-34054-sgj) | |

| EXHIBIT NUMBER | DESCRIPTION | NOTES |
|----------------|--|-------|
| PD-4 | Order Approving Settlement with Patrick Hagaman Daugherty (Claim No. 205) and Authorizing Actions Consistent Therewith (Doc. No. 3298 in Case 19-34054-sgj) | |
| PD-5 | Highland Capital Management, L.P.'s (A) Objection to Patrick Daugherty's Motion to Dismiss and (B) Cross Motion for Relief from a Final Order Pursuant to Bankruptcy Rule 9024 (Docket No. 10) | |
| PD-6 | Patrick Hagaman Daugherty's Motion for Temporary Allowance of Claim for Voting Purposes Pursuant to Bankruptcy Rule 3018 (Main Case Docket No. 1281 in Case 19-34054-sgj) | |
| PD-7 | Transcript Regarding Hearing Held 11/17/2020 Regarding Motion for Temporary Allowance of Claim (Main Case Docket No. 1426 in Case 19-34054-sgj) | |
| PD-8 | Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified) | |
| PD-9 | Order (I) Confirming the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (As Modified) and (II) Granting Related Relief | |
| PD-10 | Claimant Trust Agreement (Main Case Docket No. 1811-2 in Case 19-34054-sgj) | |
| PD-11 | (PDADV_004266) | |
| PD-12 | (DAUGHERTY ROGS 001407735) | |
| PD-13 | (DAUGHERTY ROGS 001407743) | |
| PD-14 | (PDADV_010520) | |
| PD-15 | (PDADV_000019) | |
| PD-16 | (DAUGHERTY ROGS 0003740) | |
| PD-17 | (HUNTON 001105) | |
| PD-18 | (HUNTON 00004) | |
| PD-19 | (HUNTON 001131) | |
| PD-20 | (HUNTON 001163) | |
| PD-21 | (HUNTON 001170) | |

| EXHIBIT NUMBER | DESCRIPTION | NOTES |
|----------------|--|-------|
| PD-21A | (PDADV 010244) | |
| PD-22 | (PDADV 010262) | |
| PD-23 | (PDADV_010268) | |
| PD-24 | (PDADV_010346) | |
| PD-25 | (PDADV_011013) | |
| PD-26 | 2008 Daugherty K-1 | |
| PD-27 | (DAUGHERTY ROGS 0003729) | |
| PD-28 | (DAUGHERTY ROGS 0003730) | |
| PD-29 | (DAUGHERTY ROGS 0003734) | |
| PD-30 | (PDADV_004224) | |
| PD-31 | (PDADV_004687) | |
| PD-32 | (PDADV_004856) | |
| PD-33 | (DAUGHERTY ROGS 00016700) | |
| PD-34 | (DAUGHERTY ROGS 00022527) | |
| PD-35 | Email from J. Morris to M. Bobo dated May 24, 2024 | |
| PD-36 | November 17, 2020 Main Bankruptcy Hearing Transcript | |
| PD-37 | June 25, 2025 Main Bankruptcy Hearing Transcript | |
| PD-38 | September 4, 2025 Main Bankruptcy Hearing Transcript | |
| PD-39 | March 1, 2022 Main Bankruptcy Hearing Transcript | |
| PD-40 | (PDADV_004971) | |
| PD-41 | (PDADV_011022) | |
| PD-42 | (PDADV_018160) | |
| PD-43 | (PDADV_018162) | |
| PD-44 | (PDADV_018178) | |

| EXHIBIT NUMBER | DESCRIPTION | NOTES |
|----------------|---|-------|
| PD-45 | (PDADV_018197) | |
| PD-46 | (PDADV_004808) | |
| PD-47 | (PDADV_018517) | |
| PD-48 | (PDADV_018518) | |
| PD-49 | (PDADV_018522) | |
| PD-50 | (PDADV_018520) | |
| PD-51 | (PDADV_018531) | |
| PD-52 | (PDADV_018521) | |
| PD-53 | (PDADV_018441) | |
| PD-54 | Highland's Interrogatory Responses in this Adversary Proceeding | |
| PD-55 | (PDADV_018431) | |
| PD-56 | (PDADV_008926) | |
| PD-57 | (PDADV_010052) | |
| PD-58 | (Daugherty ROGs00003060) | |
| PD-59 | (Daugherty ROGs00003294) | |
| PD-60 | (Daugherty ROGs00003634) | |
| PD-61 | (Daugherty ROGs00002069) | |
| PD-62 | (Daugherty ROGs00001255) | |
| PD-63 | (Daugherty ROGs00001109) | |
| PD-64 | (Daugherty ROGs00002753) | |
| PD-65 | (Daugherty ROGs00002009) | |
| PD-66 | (Daugherty ROGs00002162) | |
| PD-67 | (Daugherty ROGs00001282) | |

| EXHIBIT NUMBER | DESCRIPTION | NOTES |
|----------------|---|-------|
| PD-68 | (Daugherty ROGs00003659) | |
| PD-69 | (Daugherty ROGs00001302) | |
| PD-70 | (Daugherty ROGs00001578) | |
| PD-71 | (Daugherty ROGs00002893) | |
| PD-72 | (Daugherty ROGs00001257) | |
| PD-73 | (Daugherty ROGs00002041) | |
| PD-74 | (Daugherty ROGs00003352) | |
| PD-75 | (Daugherty ROGs00001054) | |
| PD-76 | (Daugherty ROGs00000714) | |
| PD-77 | (Daugherty ROGs00001830) | |
| PD-78 | Reserved. | |
| PD-79 | 2021.12.17 – Email w/ J. Seery & Sidley Counsel (JPS/Ell-000865) | |
| PD-80 | 2021.10.15 - Doc. 1 (Adv. Proc. 21-03076-sgj) – Highland’s Complaint | |
| PD-81 | 2022.05.19 - Doc. 158 (Adv. Proc. 21-03076-sgj) - Amended Highland’s Complaint and Objection to Claims | |
| PD-82 | TJ Liles Expert Report | |
| PD-83 | 2021.07.13 - J. Seery Email (JPS_ELL-011979) | |
| PD-84 | 2021.10.01 – P. Daugherty Email (JPS_ELL-008163) | |
| PD-85 | 2021.10.01 – P. Daugherty Email (JPS_ELL-012313) | |
| PD-86 | 2021.07.13 – J. Seery Email (JPS_ELL-013203) | |
| PD-87 | 2022.02.16 - Doc. 3242 (Case 19-34054) Ellington's Objection to Settlement | |
| PD-88 | 2022.01.11 – Doc. 3265-1 (Case 19-34054) Ellington’s Petition, App for TRO, TI and Permanent Injunction | |
| PD-89 | 2022.01.05 - Doc. 4266-20 (Case No. 19-34054) P. Daugherty Email to M. Kirschner | |

| EXHIBIT NUMBER | DESCRIPTION | NOTES |
|----------------|--|-------|
| PD-90 | 2023.09.13 - Doc 3910 (19-34054) - Highland's Motion to Show Cause | |
| PD-91 | 2023.11.10 - Doc 3969 (19-34054) - Highland's Reply ISO Motion to Show Cause | |
| PD-92 | 2023.12.12 - Doc 3991 (19-34054) - Order Dismissing Show Cause due to Consensual Resolution | |
| PD-93 | 2022.08.08 - UBS PowerPoint in Support of August 8, 2022 Hearing (Adv. Proc. No. 21-03020-sgj, Doc. 169) | |
| PD-94 | Tolling Agreement Extending Claim Objection Deadline (Main Case Docket No. 4255-60 in Case 19-34054-sgj) | |
| PD- | Any document entered or filed in the Debtor's chapter 11 bankruptcy case, including any exhibits thereto | |
| PD- | Any exhibits identified by or offered by any other party at the hearing | |
| PD- | Any exhibits offered for impeachment and/or rebuttal purposes | |

Daugherty reserves the right to supplement or amend this Amended Witness and Exhibit List any time prior to the trial. This Amended Witness and Exhibit List is not intended to limit Daugherty at the hearing or to imply that Daugherty may not seek introduction of evidence that is not on this list. Daugherty reserves the right to use any of the exhibits designated by any other party in this case

Dated: April 14, 2026.

Respectfully submitted,

GRAY REED

By: /s/ Andrew K. York

Jason S. Brookner
Texas Bar No. 24033684
Andrew K. York
Texas Bar No. 24051554
Joshua D. Smeltzer
Texas Bar No. 24113859
J. Reid Burley
Texas Bar No. 24109675
Drake M. Rayshell
Texas Bar No. 24118507

1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: jbrookner@grayreed.com
dyork@grayreed.com
jsmeltzer@grayreed.com
rburley@grayreed.com
drayshell@grayreed.com

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 14th day of April 2026, via the CM/ECF system and/or email.

/s/ Andrew K. York
ANDREW K. YORK