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
Fax: (310) 201-0760

WILLKIE FARR & GALLAGHER LLP
Mark T. Stancil (admitted *pro hac vice*)
Joshua S. Levy (admitted *pro hac vice*)
1875 K Street, N.W.
Washington, D.C. 20006
(202) 303-1000
mstancil@willkie.com
jlevy@willkie.com

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, TX 75231
Tel: (972) 755-7100
Fax: (972) 755-7110

Counsel for Highland Capital Management, L.P. and the Highland Claimant Trust

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

In re: HIGHLAND CAPITAL MANAGEMENT, L.P. Reorganized Debtor.	Chapter 11 Case No. 19-34054-sgj11
THE DUGABOY INVESTMENT TRUST, Appellant, v. HIGHLAND CAPITAL MANAGEMENT, L.P. *et al.,* Appellees.	Case No. 3:26-cv-02315-X

MOTION TO WITHDRAW HAYLEY R. WINOGRAD AS COUNSEL

Highland Capital Management, L.P. ("Highland") and the Highland Claimant Trust (the "Claimant Trust"), appellees in the above-referenced matter (the

"Appeal"), file this motion (the "Motion") respectfully requesting that the Court enter an order, substantially in the form attached as **Exhibit A** hereto (the "Proposed Order"), permitting the withdrawal of Hayley R. Winograd as an attorney of record for Highland and the Claimant Trust in the Appeal. Ms. Winograd has left the law firm of Pachulski, Stang, Ziehl & Jones LLP (the "Pachulski Firm"). This Motion does not affect and is not intended to affect the appearance of the other attorneys of record at the Pachulski Firm who have appeared in the Appeal on behalf of Highland and the Claimant Trust. Highland and the Claimant Trust will continue to be represented in the Appeal by counsel of record from the Pachulski Firm, Willkie Farr & Gallagher LLP, and Hayward PLLC. Per the certificate of conference attached to this Motion, Ms. Winograd is unopposed to the relief requested herein.

WHEREFORE, Highland and the Claimant Trust respectfully request that the Court enter the Proposed Order (i) granting the Motion, and (ii) granting Highland and the Claimant Trust such further and additional relief as the Court deems necessary and appropriate.

Dated: August 17, 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 Boulevard, 13th Floor
Los Angeles, CA 90067
Tel: (310) 277-6910
Fax: (310) 201-0760
Email: jpomerantz@pszjlaw.com
jmorris@pszjlaw.com
gdemo@pszjlaw.com
jkroop@pszjlaw.com

WILLKIE FARR & GALLAGHER LLP

Mark T. Stancil
(admitted *pro hac vice*)
Joshua S. Levy
(admitted *pro hac vice*)
1875 K Street, N.W.
Washington, D.C. 20006
(202) 303-1000
mstancil@willkie.com
jlevy@willkie.com

-and-

HAYWARD PLLC

/s/ Zachery Z. Annable
Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expwy, Ste. 106
Dallas, TX 75231
Tel: (972) 755-7100
Fax: (972) 755-7110

Counsel for Highland Capital Management, L.P. and the Highland Claimant Trust

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that, on August 17, 2026, Zachery Z. Annable, counsel for Highland and the Claimant Trust, corresponded with Hayley R. Winograd regarding the relief requested in the foregoing Motion. Ms. Winograd indicated she is **UNOPPOSED** to the relief requested in the Motion.

/s/ Zachery Z. Annable
Zachery Z. Annable

CERTIFICATE OF COMPLIANCE

1. This document complies with the word limit of Fed. R. Bankr. P. 8013(f)(3)(A) because, excluding the portions excluded by Fed. R. Bankr. P. 8015(g), this document contains 214 words.

2. This document complies with the typeface requirements of Fed. R. Bankr. P. 8015(a)(5) and the type-style requirements of Fed. R. Bankr. P. 8015(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word, typeface Times New Roman, 14-point type (12-point type of footnotes).

/s/ Zachery Z. Annable
Zachery Z. Annable

CERTIFICATE OF SERVICE

I hereby certify that, on August 17, 2026, a true and correct copy of the foregoing document was served electronically via the Court's CM/ECF system upon all parties receiving electronic notice in this case.

/s/ Zachery Z. Annable
Zachery Z. Annable

EXHIBIT A

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

In re: HIGHLAND CAPITAL MANAGEMENT, L.P. Reorganized Debtor.	Chapter 11 Case No. 19-34054-sgj11
THE DUGABOY INVESTMENT TRUST, Appellant, v. HIGHLAND CAPITAL MANAGEMENT, L.P. *et al.,* Appellees.	Case No. 3:26-cv-02315-X

ORDER GRANTING
MOTION TO WITHDRAW HAYLEY R. WINOGRAD AS COUNSEL

Upon consideration of the *Motion to Withdraw Hayley R. Winograd as Counsel* (the "Motion")[1] filed by Highland Capital Management, L.P. ("Highland") and the Highland Claimant Trust (the "Claimant Trust"), appellees in the above-referenced matter (the "Appeal"), the Court finds and concludes that the factual and legal bases set forth in the Motion establish sufficient cause for the relief granted in this Order; therefore, after due deliberation, **IT IS ORDERED, ADJUDGED, AND DECREED THAT**:

1. The Motion is **GRANTED** as set forth herein.

[1] Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.

2. Hayley R. Winograd is permitted to withdraw as counsel of record for Highland and the Claimant Trust in the Appeal.

3. The Clerk of this Court and all parties are directed to remove Hayley R. Winograd as counsel of record for Highland and the Claimant Trust on the docket and any applicable service list, including the Court's CM/ECF electronic notification list, maintained in the Appeal.

IT IS SO ORDERED this __ day of _____, 2026.

_____
The Honorable Brantley Starr
United States District Judge