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**Counsel for Meta-e Discovery, LLC**

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

In re:	)	Chapter 11
	)	
HIGHLAND CAPITAL MANAGEMENT,	)	Case No. 19-34054-sgj11
L.P., <sup>1</sup>	)	
Debtor.	)	
	)	
	)	Docket Ref. Nos. 1079, 1080 & 1108

**JOINDER OF META-E DISCOVERY, LLC TO THE OBJECTION OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS TO THE DEBTOR'S MOTION FOR  
ENTRY OF AN ORDER (A) APPROVING THE ADEQUACY OF THE DISCLOSURE  
STATEMENT; (B) SCHEDULING A HEARING TO CONFIRM THE FIRST AMENDED  
PLAN OF REORGANIZATION; (C) ESTABLISHING DEADLINE FOR FILING  
OBJECTIONS TO CONFIRMATION OF PLAN; (D) APPROVING FORM OF  
BALLOTS, VOTING DEADLINE AND SOLICITATION PROCEDURES; AND (E)  
APPROVING FORM AND MANNER OF NOTICE**

<sup>1</sup> The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.



Meta-e Discovery, LLC (“Meta-e”), as creditor of the above-captioned debtor (the “Debtor”), and a member of the Official Unsecured Creditors Committee, hereby joins in the *Objection of the Official Committee of Unsecured Creditors to the Debtor's Motion for Entry of an Order (A) Approving the Adequacy of the Disclosure Statement; (B) Scheduling a Hearing to Confirm the First Amended Plan of Reorganization; (C) Establishing Deadline for Filing Objections to Confirmation of Plan; (D) Approving Form of Ballots, Voting Deadline and Solicitation Procedures; and (E) Approving Form and Manner of Notice* (Docket No. 1239) (the “Committee Objection”), and respectfully represents as follows:

### **JOINDER**

1. As of the Petition date, Meta-E was owed \$779,969.84 by the Debtor on account of discovery services performed by Meta-E. Meta-E also sits as a member of the Official Committee of Unsecured Creditors.

2. Meta-E adopts, incorporates, and joins in the Committee Objection as if fully stated in this objection.

### **RESERVATION OF RIGHTS**

3. Meta-E hereby reserves its rights to (a) further address the *Debtor's Motion for Entry of an Order (A) Approving the Adequacy of the Disclosure Statement; (B) Scheduling a Hearing to Confirm the First Amended Plan of Reorganization; (C) Establishing Deadline for Filing Objections to Confirmation of Plan; (D) Approving Form of Ballots, Voting Deadline and Solicitation Procedures; and (E) Approving Form and Manner of Notice* (the “Disclosure Statement Motion”) and any proposed form of order, (b) object to approval of the Disclosure Statement Motion, and (c) to seek such other relief as is just and proper.

### **CONCLUSION**

For the reasons stated above and in the Response, Meta-E respectfully requests that the Court deny the Disclosure Statement Motion, and grant such other relief as is just and proper.

Dated: October 20, 2020

**UMARI ZUGARO, PLLC**

/s/ Basil A. Umari

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(*pro hac vice* to be filed)

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