Entered 0/1/02/2/ 15:26:55 Desc Docket #4046 Date Filed: 04/02/2024 Filed UV/US/SV Case 19-34054-sqi11 Doc 4046 Main Document raye I UI 3

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717) (pro hac vice) John A. Morris (NY Bar No. 2405397) (pro hac vice) Gregory V. Demo (NY Bar No. 5371992) (pro hac vice) 10100 Santa Monica Blvd., 13th Floor

Los Angeles, CA 90067 Telephone: (310) 277-6910 Facsimile: (310) 201-0760

HAYWARD PLLC

Melissa S. Hayward (Texas Bar No. 24044908) Zachery Z. Annable (Texas Bar No. 24053075) 10501 N. Central Expy, Ste. 106

Dallas, TX 75231 Tel: (972) 755-7100

Fax: (972) 755-7110

Counsel for Highland Capital Management, L.P.

REICHMAN JORGENSEN LEHMAN & FELDBERG LLP

Amy L. Ruland (Texas Bar No. 24043561) 901 S. Mopac Expwy, Suite 300 Austin, TX 78746 Tel.: (737) 227-3102

HOGE & GAMEROS L.L.P.

Charles W. Gameros, Jr., P.C. Texas Bar No. 00796956 Douglas Wade Carvell, P.C. Texas Bar No. 00796316 6116 North Central Expressway, Suite 1400 Dallas, Texas 75206 Tel.: (214) 765-6002

Attorneys for NexPoint Real Estate Partners LLC (f/k/a HCRE Partners, LLC)

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.)	
)	

STIPULATION REGARDING BRIEFING SCHEDULE [DOCKET NO. 4040]

This stipulation (the "Stipulation") is made and entered into by and between Highland Capital Management, L.P., the reorganized debtor in the above-captioned proceeding ("Highland"), and NexPoint Real Estate Partners, LLC (formerly known as HCRE Partners, LLC) ("HCRE," and together with Highland, the "Parties"), by and through their respective undersigned counsel.

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



DOCS NY:45898.2 36027/003 4890-6170-8466.1 36027.003

RECITALS

WHEREAS, on March 5, 2024, the Court entered a Memorandum Opinion and Order Granting Highland Capital Management, L.P.'s Motion for (A) Bad Faith Finding and (B) Attorneys' Fees Against NexPoint Real Estate Partners, LLC (f/k/a HCRE Partners, LLC) in Connection with Proof of Claim #146 [Docket No. 4039] (the "Order"); and

WHEREAS, on March 18, 2024, HCRE filed a *Motion for Relief from Order* [Docket No. 4040] and an accompanying *Memorandum of Law* [Docket No. 4041] (the "Motion") seeking certain relief with respect to the Order;

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

STIPULATION

- 1. Highland's deadline to file any opposition, objection, or response to the Motion (any such filing, an "Objection") is hereby extended from April 8, 2024, to April 22, 2024; and
- 2. On or before May 1, 2024, HCRE shall file its reply to any timely filed Objection; and
- 3. Promptly after Highland files its Objection, the Parties shall jointly request a setting to hear argument on the Motion as soon as the Court can be heard on or after May 8, 2024.
- 4. The Court shall retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Order.

[Remainder of Page Intentionally Blank]

Dated: April 2, 2024

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) 10100 Santa Monica Blvd., 13th Floor

Los Angeles, CA 90067 Telephone: (310) 277-6910 Facsimile: (310) 201-0760 F-mail: inomerantz@pszilay

E-mail: jpomerantz@pszjlaw.com jmorris@pszjlaw.com gdemo@pszjlaw.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 Expy, Ste. 106
Dallas, Texas 75231

Telephone: (972) 755-7100 Facsimile: (972) 755-7110

Counsel for Highland Capital Management, L.P.

REICHMAN JORGENSEN LEHMAN & FELDBERG LLP

Amy L. Ruland (Texas Bar No. 24043561) 901 S. Mopac Expwy, Suite 300 Austin, TX 78746 Tel.: (737) 227-3102

HOGE & GAMEROS L.L.P.

/s/ Charles W. Gameros, Jr.
Charles W. Gameros, Jr., P.C.
Texas Bar No. 00796956
Douglas Wade Carvell, P.C.
Texas Bar No. 00796316
6116 North Central Expressway, Suite 1400
Dallas, Texas 75206
Tel.: (214) 765-6002

Attorneys for NexPoint Real Estate Partners LLC (f/k/a HCRE Partners, LLC)