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COUNSEL FOR DAVIS DEADMAN, TODD TRAVERS, AND PAUL KAUFFMAN

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

In re:	§	
	§	CASE NO. 19-34054-SGJ-11
HIGHLAND CAPITAL MANAGEMENT,	§	
L.P	§	CHAPTER 11
	§	
Debtor.	§	

JOINDER TO LIMITED OBJECTION OF JACK YANG AND BRAD BORUD TO FIFTH AMENDED PLAN OF **REORGANIZATION OF HIGHLAND CAPITAL MANAGEMENT, L.P.**

Davis Deadman, Todd Travers, Paul Kauffman (collectively, the "Former Employees"), creditors and parties-in-interest in the above-captioned bankruptcy case, file this joinder to the Limited Objection of Jack Yang and Brad Borud to Fifth Amended Plan of Reorganization of Highland Capital, L.P. (the "Limited Objection") [Docket No. 1666]. The Former Employees adopt the legal argument and authority set forth in the Limited Objection and respectfully request that the Court (a) either require that the Plan be clarified to provide that claims in Class 9 are limited to claims that are subordinated under section 510 of the Bankruptcy Code or deny confirmation, and (b) grant them such other and further relief as is appropriate.

JOINDER TO LIMITED OBJECTION OF JACK YANG AND BRAD OF REORGANIZATION OF HIGHLAND CAPITAL MANAGEMEN



Dated: January 5, 2021.

Respectfully submitted,

<u>/s/ Jason P. Kathman</u> Jason P. Kathman State Bar No. 24070036 SPENCER FANE LLP 5700 Granite Parkway, Suite 650 Plano, Texas 75024 (972) 324-0300- Telephone (972) 324-0301 – Facsimile Email: jkathman@spencerfane.com

COUNSEL FOR PATRICK HAGAMAN DAUGHERTY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 5, 2021 a copy of the attached Objection was served via the Court's electronic transmission facilities upon all parties receiving notice via the Court's ECF system, and has been served via email upon counsel for the Debtor and the Committee via e-mail.

<u>/s/ Jason P. Kathman</u> Jason P. Kathman