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COUNSEL FOR CLO HOLDCo, LTD.

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

In re:	§	Case No. 19-34054-sgj11
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	
	§	Chapter 11
	§	
Debtor	§	

**EX PARTE CONSENT MOTION FOR ADMINISTRATIVE ORDER EFFECTUATING
STIPULATION AND ORDER**



CLO HoldCo, Ltd. (“CLO HoldCo”)¹ files this *Ex Parte Consent Motion for Administrative Order Effectuating Stipulation and Order* (the “Motion”) and respectfully requests that the Court enter an order substantially in the form submitted herewith (the “Proposed Order”) effectuating the terms of that *Stipulation and Order* [Adversary No. 20-03195, Dkt. No. 92] (“Stipulation and Order”) so that the Clerk’s Office will release the Registry Funds (as defined in the Stipulation and Order) to CLO HoldCo as contemplated by the Stipulation and Order.

The Proposed Order contains language that, notwithstanding the Stipulation and Order, the Clerk’s Office requires before it will disburse the Registry Funds to CLO HoldCo. The Proposed Order does not change the terms of the Stipulation and Order. Counsel for CLO HoldCo has conferred with counsel for the Plaintiff regarding the Motion and Proposed Order and the Plaintiff does not object to the relief requested in the Motion or entry of the Proposed Order.

CONCLUSION

For the reasons set forth herein, CLO HoldCo respectfully requests that the Court grant the present Motion enter the Proposed Order directing the disburse of the Registry Funds to CLO HoldCo.

Respectfully submitted:

KELLY HART PITRE

/s/ **Louis M. Phillips**

Louis M. Phillips (#10505)

One American Place

301 Main Street, Suite 1600

¹ CLO HoldCo has filed a *Motion to Withdraw the Reference* [Adversary Proceeding, Dkt. No. 24] (the “Motion to Withdraw the Reference”), in part based upon CLO HoldCo’s right to a jury trial and to Article III adjudication of any claims asserted by the Plaintiff against CLO HoldCo. Nothing in this Motion shall be construed or deemed to be a waiver of any right to jury trial and Article III adjudication.

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CERTIFICATE OF CONFERENCE

I, undersigned counsel, hereby certify that on October 12, 2021, I conferred with counsel for the Plaintiff regarding the relief requested herein and that the Plaintiff consents to the relief requested herein.

/s/ *Louis M. Phillips*

Louis M. Phillips

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that a true and correct copy of the above and foregoing document and all attachments thereto were sent via electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case on this October 21, 2021.

/s/ *Louis M. Phillips*

Louis M. Phillips

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

In re:	§	Case No. 19-34054-sgj11
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	
	§	Chapter 11
	§	
Debtor	§	

**ORDER EFFECTUATING STIPULATION AND ORDER AND
DISBURSING REGISTRY FUNDS TO CLO HOLDCO**

Upon consideration of CLO HoldCo, LTD.'s ("**CLO HoldCo**") *Ex Parte Consent Motion for Administrative Order Effectuating Stipulation and Order* (the "**Motion**"),

IT IS HEREBY ORDERED that:

1. The Motion is GRANTED.
2. The Registry Funds, as referenced in the *Stipulation and Order* [Adversary No. 20-03195, Dkt. No. 92], consisting of:

(i) distributions from (a) Highland Dynamic Income Fund, L.P., (b) Highland Dynamic Income Fund, Ltd., and (c) Highland Dynamic Income Master Fund, L.P. (collectively, **“Dynamic Distribution”**); and

(ii) (a) Highland Argentina Regional Opportunity Fund, L.P., (b) Highland Argentina Regional Opportunity Fund, Ltd., and (c) Highland Argentina Regional Opportunity Master Fund, L.P. (collectively, **“AROF Distribution”**)

due to CLO HoldCo (previously referred to from time to time as **“CLOH”**), are to be disbursed from the Registry of the Court as follows, from the Dynamic Distribution \$1,603,439.44, plus any and all accrued interest, and from the AROF Distribution, \$918,905.82, plus any and all accrued interest. These funds are payable to CLO HoldCo, Ltd., and payment should be mailed to: Attn: Mark Patrick, 2101 Cedar Springs Road, Suite 1200, Dallas, TX 75201.

END OF ORDER