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Counsel for Highland Capital Management, L.P.

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

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HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,

Defendants.

Adv. Proc. No. 21-03003-sgj

Case No. 3:21-cv-00881-X



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HIGHLAND CAPITAL MANAGEMENT, L.P.,	§ §
Plaintiff,	<pre> § Adv. Proc. No. 21-03004-sgj § § </pre>
VS.	8 8
HIGHLAND CAPITAL MANAGEMENT FUND ADVISORS, L.P.,	⁸ § Case No. 3:21-cv-00881-X § § §
Defendant.	\$ \$ \$
HIGHLAND CAPITAL MANAGEMENT, L.P.,	\$ \$
Plaintiff,	§ § Adv. Proc. No. 21-03005-sgj
VS.	\$ \$
NEXPOINT ADVISORS, L.P., JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,	<pre> § Case No. 3:21-cv-00881-X § § </pre>
Defendants.	§ §
HIGHLAND CAPITAL MANAGEMENT, L.P.,	\$ \$
Plaintiff,	§ § Adv. Proc. No. 21-03006-sgj
VS.	\$ \$
HIGHLAND CAPITAL MANAGEMENT SERVICES, INC., JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,	<pre> § Case No. 3:21-cv-00881-X § § § </pre>
Defendants.	\$ \$

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HIGHLAND CAPITAL MANAGEMENT, L.P.,		
Plaintiff,	§ § §	Adv. Proc. No. 21-03007-sgj
VS.	ş	
	§	Case No. 3:21-cv-00881-X
HCRE PARTNERS, LLC (n/k/a NexPoint	§	
Real Estate Partners, LLC), JAMES	§	
DONDERO, NANCY DONDERO, AND	§	
THE DUGABOY INVESTMENT TRUST,	§	
	Š	
Defendants.	\$ 8	

HIGHLAND CAPITAL MANAGEMENT, L.P.'S RESPONSE TO DEFENDANTS' OBJECTIONS TO PLAINTIFF'S PROPOSED FORM OF JUDGMENT AWARDING <u>ATTORNEY'S FEES AND COSTS</u>

Highland Capital Management, L.P., the reorganized debtor and the plaintiff in the abovecaptioned adversary proceedings ("<u>Highland</u>" or "<u>Plaintiff</u>"), hereby files this response (the "<u>Response</u>") to *Defendants' Objections to Plaintiff's Proposed Form of Judgment Awarding Attorney's Fees and Costs* (the "<u>Objection</u>").¹ Highland fully incorporates by reference its contemporaneously filed brief (the "<u>Brief</u>") in response to the Objection and would show unto the Court as follows:

<u>RELIEF REQUESTED²</u>

1. By this Response, Highland respectfully requests that the Court enter an order overruling the Objection.

2. Pursuant to Rules 7.1(d) and (h) of the *Local Civil Rules of the United States*

¹ The defendants (collectively, the "<u>Defendants</u>") filed identical copies of their Objection in each of the Adversary Proceedings. *See* Adv. Pro. No. 21-03003-sgj, Docket No. 204; Adv. Pro. No. 21-03004-sgj, Docket No. 173; Adv. Pro. No. 21-03005-sgj, Docket No. 221; Adv. Pro. No. 21-03006-sgj, Docket No. 226; Adv. Pro. No. 21-03007-sgj, Docket No. 221.

² Capitalized terms shall have the meanings ascribed to them in the Brief.

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District Court for the Northern District of Texas, Dallas Division (the "Local Rules"), the Brief is

being filed contemporaneously with this Response and is incorporated by reference.

<u>PRAYER</u>

WHEREFORE, Highland respectfully requests that the Court (i) overrule the Objection,

and (ii) grant such other and further relief as the Court deems just and proper.

Dated: September 27, 2022

PACHULSKI STANG ZIEHL & JONES LLP

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