

Highland Capital Management, L.P. (as Modified) (the “Motion”). In support of the Motion, the Debtor would respectfully show the Court as follows:

1. On October 16, 2019 (the “Petition Date”), the Debtor commenced a voluntary case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Case”).

2. The Bankruptcy Case was transferred to this Court on December 4, 2019.

3. On November 24, 2020, the Court entered its *Order (A) Approving the Adequacy of the Disclosure Statement; (B) Scheduling a Hearing to Confirm the Fifth 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. 1476] (the “Disclosure Statement Order”). The Disclosure Statement Order approved the *Disclosure Statement for the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket no. 1473] (the “Disclosure Statement”) as containing “adequate information” within the meaning of section 1125 of the Bankruptcy Code, and it also approved, among other things, the proposed procedures for solicitation of the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket No. 1472] (as subsequently modified, the “Plan”) and related notices, forms, and ballots.

4. The deadline for all parties-in-interest to file objections to confirmation of the Plan was January 5, 2021 at 5:00 p.m. (Central Time) (the “Objection Deadline”). The hearing on confirmation of the Plan (the “Confirmation Hearing”) is currently scheduled to commence on January 26, 2021 at 9:30 a.m. (Central Time).

5. On January 22, 2021, the Debtor filed, among other documents, (i) the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified)* [Docket

No. 1808], (ii) its *Omnibus Reply to Objections to Confirmation of the Fifth Amended Plan of Reorganization of Highland Capital Management L.P. (with Technical Modifications)* [Docket No. 1807] (the “Omnibus Reply”), and (iii) its *Memorandum of Law in Support of Confirmation of the Fifth Amended Chapter 11 Plan of Reorganization of Highland Capital Management L.P.* [Docket No. 1814] (the “Confirmation Brief”, and collectively with the modified Plan and the Omnibus Reply, the “Confirmation Hearing Documents”) in response to the various objections to the Plan lodged by parties-in-interest.

6. Due to the volume of information contained within the Confirmation Hearing Documents and the relatively short period of time for parties-in-interest to review the Confirmation Hearing Documents prior to the current Confirmation Hearing setting of January 26, 2021, the Debtor is filing this Motion seeking a brief continuance of the Confirmation Hearing to **February 2, 2021 at 9:30 a.m. (Central Time)** (the “New Hearing Date”). Debtor’s counsel has conferred with counsel for the Official Committee of Unsecured Creditors (the “Committee”), and the Committee is unopposed to rescheduling the Confirmation Hearing for the New Hearing Date.

7. This Motion is being filed not for the purposes of delay, but solely to facilitate the parties’ review of the Confirmation Hearing Documents and the continued negotiation of certain issues related to the Plan and the objections thereto.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that the Court grant this Motion, continue the Confirmation Hearing until February 2, 2021 at 9:30 a.m. (Central Time), and grant the Debtor such other and further relief as is just and equitable.

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Dated: January 25, 2021.

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