

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA  
c/o Department of Justice  
Washington, D.C. 20530,  
Plaintiff,

v.

JAMES D. DONDERO,  
c/o Highland Capital Management, L.P.  
Two Galleria Tower  
13455 Noel Road, Suite 1300  
Dallas, Texas 75240,  
Defendant.

Civil Action No.

**STIPULATION**

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

(1) the parties consent that the Court may file and enter a Final Judgment in the form attached to this Stipulation, on the Court's own motion or on the motion of any party at any time, and without further notice to any party or other proceedings, if Plaintiff has not withdrawn its consent, which it may do at any time before the entry of judgment by serving notice of its withdrawal on Defendant James D. Dondero and filing that notice with the Court;

(2) Defendant James D. Dondero waives any objection to venue or jurisdiction for purposes of this Final Judgment and authorizes Veronica G. Kayne of Haynes and Boone, LLP to accept service of all process in this matter on his behalf; and

(3) in the event Plaintiff withdraws its consent or if the proposed Final Judgment is not entered pursuant to this Stipulation, this Stipulation shall be of no effect whatever and the making of this Stipulation shall be without prejudice to any party in this or any other proceeding.

Dated: \_\_\_\_\_

**FOR THE DEFENDANT:**

\_\_\_\_\_  
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Counsel for Defendant

**FOR THE PLAINTIFF:**

\_\_\_\_\_  
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\_\_\_\_\_  
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