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**PROPOSED COUNSEL TO DEBTORS AND
DEBTORS IN POSSESSION**

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

In re:	§	
	§	Chapter 11
	§	
Higher Ground Education, Inc., <i>et al.</i> , ¹	§	Case No.: 25-80121-11 (MVL)
	§	
Debtor.	§	(Joint Administration Requested)

**DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER
(I) AUTHORIZING THE DEBTORS TO SERVE A CONSOLIDATED LIST OF
CREDITORS; (II) AUTHORIZING THE DEBTORS TO REDACT CERTAIN
PERSONAL IDENTIFICATION INFORMATION; (III) APPROVING THE
FORM AND MANNER OF NOTIFYING CREDITORS OF THE
COMMENCEMENT OF THE DEBTORS' CHAPTER 11 CASES AND BAR
DATES; AND (IV) GRANTING RELATED RELIEF**

Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby file *Debtors' Emergency Motion for Entry of an Order (I) Authorizing the Debtors*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal identification number, are: Higher Ground Education Inc. (7265); Guidepost A LLC (8540); Prepared Montessorian LLC (6181); Terra Firma Services LLC (6999); Guidepost Birmingham LLC (2397); Guidepost Bradley Hills LLC (2058); Guidepost Branchburg LLC (0494); Guidepost Carmel LLC (4060); Guidepost FIC B LLC (8609); Guidepost FIC C LLC (1518); Guidepost Goodyear LLC (1363); Guidepost Las Colinas LLC (9767); Guidepost Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); Guidepost St Robert LLC (5136); Guidepost The Woodlands LLC (6101); Guidepost Walled Lake LLC (9118); HGE FIC D LLC (6499); HGE FIC E LLC (0056); HGE FIC F LLC (8861); HGE FIC G LLC (5500); HGE FIC H LLC (8817); HGE FIC I LLC (1138); HGE FIC K LLC (8558); HGE FIC L LLC (2052); HGE FIC M LLC (8912); HGE FIC N LLC (6774); HGE FIC O LLC (4678); HGE FIC P LLC (1477); HGE FIC Q LLC (3122); HGE FIC R LLC (9661); LePort Emeryville LLC (7324); AltSchool II LLC (0403). The Debtors' mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.



to Serve a Consolidated List of Creditors; (II) Authorizing the Debtors to Redact Certain Personal Identification Information; (III) Approving the Form and Manner of Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Dates; and (IV) Granting Related Relief (this “**Motion**”).² In support of this Motion, the Debtors respectfully represent as follows:

I.
JURISDICTION, VENUE, AND PREDICATES FOR RELIEF

1. The United States Bankruptcy Court for the North District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). The Debtors confirm their consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), to the entry of a final order by the Court.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105, 107, and 521 of title 11 of the United States Code (the “**Bankruptcy Code**”), Bankruptcy Rules 1007, 2002, and 3003, Rule 9013-1 of the Local Bankruptcy Rules for the Northern District of Texas (the “**Local Rules**”), and the Procedures for Complex Cases in the Northern District of Texas.

II.
BACKGROUND

4. From their inception in 2016 through the beginning of 2025, the Debtors grew to over 150 schools (the “**Schools**”), becoming the largest owner and operator of Montessori schools in the world. The Debtors’ mission was to modernize and mainstream the Montessori education movement. In addition to owning and operating the Schools, the Debtors provided training and consulting services to Montessori schools around the world. The Debtors sought to offer an end-

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the First Day Declaration (defined below).

to-end experience that covers the entire lifecycle of a family at school, virtually, and at home, from birth through secondary education—enabled by next-gen, accredited Montessori instruction. Information on the Debtors, their businesses, and a summary of the relief requested in this Motion can be found in the *Declaration of Jonathan McCarthy in Support of First Day Motions* (the “**First Day Declaration**”), filed concurrently herewith and incorporated herein by reference.

5. On June 17, 2025 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11. The Debtors remain in possession of their property and are managing their businesses as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. The court has not appointed a trustee, and no official committee has been established.

6. Contemporaneously with the filing of this Motion, the Debtors have filed with the Court a motion requesting joint administration of the Chapter 11 Cases for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

III. **REQUEST FOR RELIEF**

7. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”): (a) authorizing the Debtors to serve a consolidated creditor matrix and list of the 30 largest general unsecured creditors in lieu of submitting separate mailing matrices; (b) authorizing the Debtors to redact certain personal identification information; (c) approving the form and manner of notifying creditors of the commencement of the Debtors’ Chapter 11 Cases and bar dates; and (d) granting related relief.

IV. **BASIS FOR RELIEF**

A. Consolidated Creditor Matrix

8. Bankruptcy Rule 1007(a)(1) requires a debtor to file “a list containing the name and address of each entity included or to be included on Schedules D, E/F, G, and H.” FED. R.

BANKR. P. 1007(a)(1). Although the list of creditors usually is filed on a debtor-by-debtor basis, in a complex chapter 11 bankruptcy case involving more than one debtor, the debtors may file a consolidated creditor matrix.³ Accordingly, the Debtors request authority to serve one consolidated list of creditors (the “**Creditor Matrix**”) for all of the Debtors.

B. Consolidated List of the 30 Largest General Unsecured Creditors

9. Pursuant to Bankruptcy Rule 1007(d), a debtor shall file “a list containing the name, address and claim of the creditors that hold the 30 largest unsecured claims, excluding insiders.” FED. R. BANKR. P. 1007(d). Because a large number of creditors may be shared amongst the Debtors, the Debtors request authority to file a single, consolidated list of their 30 largest general unsecured creditors (the “**Top 30 List**”). The Top 30 List will help alleviate administrative burdens, costs, and the possibility of duplicative service.

C. Cause Exists to Redact Certain Confidential Information

10. Section 107(c) of the Bankruptcy Code provides that the Court “for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual[:] . . . [a]ny means of identification . . . contained in a paper filed, or to be filed in a case under” the Bankruptcy Code. 11 U.S.C. § 107(c)(1)(A).

11. The Debtors request that the Court authorize the Debtors to redact the addresses of individuals, including the Debtors’ employees, former employees, stockholders, and shareholders from the Creditor Matrix and any other documents filed in these Chapter 11 Cases. Although transparency is important to the bankruptcy process, Congress recognized a counterbalancing interest in enacting section 107(c)(1)— the need to protect the identities and privacy of individuals.

³ See *Procedures for Complex Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of Texas*, Exhibit G.

The statutory language demonstrates Congress' desire for courts to have flexibility to protect individuals' identities. Section 107(c)(1)(B) of the Bankruptcy Code allows a bankruptcy court to shield "[o]ther information" apart from "means of identification," and the definition of "means of identification" is itself a non-exhaustive list of personally identifiable information. 11 U.S.C. § 107(c)(1)(B). Although an individual's home address is not explicitly enumerated as a "means of identification," it is nevertheless within the broad scope of section 107(c)(1)(B).

12. With numerous potential creditors, the Debtors cannot reasonably know with sufficient certainty whether the release of these individuals' personal information could potentially jeopardize their safety. In these circumstances, the Debtors respectfully submit that it is appropriate for the Court to authorize the Debtors to redact the home addresses of individuals—including those of the Debtors' employees, former employees, stockholders, and families of students—from the Creditor Matrix and any other documents filed or to be filed with the Court in these Chapter 11 Cases. Such information could be used, among other things, to perpetrate identity theft or locate survivors of domestic violence or stalking who have otherwise taken steps to conceal their whereabouts. This risk is not merely speculative. In at least one recent chapter 11 case, the abusive former partner of a debtor's employee exploited the publicly accessible creditor and employee information filed in the chapter 11 case to track the employee to her new address, which had not been publicly available until then, forcing the employee to change addresses again for her safety.⁴

13. The Debtors propose to provide, on a confidential basis, an unredacted version of the Creditor Matrix and any other applicable filings redacted pursuant to the order to (a) the Court, the United States Trustee, and counsel to any statutory committee appointed in these Chapter 11

⁴ The incident, which took place during the first Charming Charlie chapter 11 proceedings in 2017, is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. Jul. 11, 2019) [Docket No. 4].

Cases, and (b) upon a request to the Debtors (e-mail is sufficient) or to the Court that is reasonably related to these Chapter 11 Cases, any party in interest. This procedure will ensure that certain parties receive fully unredacted information while balancing the Debtors' concerns about safeguarding parties' safety and privacy; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request.

D. Approval of Bar Dates

14. Bankruptcy Rule 3003(c)(3) provides that “[t]he court shall fix . . . the time within which proofs of claim or interest may be filed.” FED. R. BANKR. P. 3003(c)(3). Accordingly, the Debtors request that the Court set bar dates for filing proofs of claim in these Chapter 11 Cases. Neither the Bankruptcy Code, the Bankruptcy Rules, nor the Local Rules specify a time by which proofs of claim must be filed in chapter 11 cases, other than section 502(b)(9) of the Bankruptcy Code, which provides that governmental units shall have a minimum 180 days after the entry of the order for relief to file proofs of claim. *See* 11 U.S.C. § 502(b)(9).

15. **General Claims Bar Date.** Except as otherwise set forth herein, the Debtors also seek to establish **August 7, 2025** (the “**General Claims Bar Date**”) as the deadline by which all persons and entities must submit Proofs of Claim asserting claims⁵ that arose on or before the Petition Date (each, a “**Claim**”) against any of the Debtors in these Chapter 11 Cases. The proposed General Claims Bar Date includes Claims asserted under section 503(b)(9) of the Bankruptcy

⁵ Except as otherwise defined herein, all terms shall have the meanings ascribed to them by the Bankruptcy Code. In particular, as used herein: (a) the term “claim” has the meaning given to it in section 101(5) of the Bankruptcy Code; (b) the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code; (c) the term “governmental unit” has the meaning given to it in section 101(27) of the Bankruptcy Code; and (d) the term “person” has the meaning given to it in section 101(41) of the Bankruptcy Code.

Code.⁶ If approved, the proposed General Claims Bar Date would occur at least 51 days after the Petition Date and at least 30 days after service of the Notice of Commencement.

16. **Governmental Bar Date.** In addition to the General Claims Bar Date, and pursuant to section 502(b)(9) of the Bankruptcy Code, the Debtors request that the Court establish **December 15, 2025** (the “**Governmental Bar Date**”) as the deadline by which all governmental units must submit Proofs of Claim asserting Claims that arose on or before the Petition Date against any of the Debtors in these Chapter 11 Cases. If approved, the proposed Governmental Bar Date would occur at least 180 days after the Petition Date.

17. **Rejection Damages Bar Date.** The Debtors also seek to require any person or entity that holds a Claim arising from the rejection of an executory contract or unexpired lease to submit a Proof of Claim based on such rejection on or before the later of (a) the General Claims Bar Date or (b) any date this Court may fix in the applicable order authorizing such rejection and, if no such date is provided, thirty (30) days after the date of entry of such order (the “**Rejection Damages Bar Date**”). The Debtors will provide notice of the Rejection Bar Date to the contract or lease counterparty whose contract or lease is being rejected at the time the Debtors reject any executory contract or unexpired lease.

18. **Amended Schedules Bar Date.** The Debtors further propose that, if the Debtors amend their Schedules, and such amendment (i) reduces the undisputed, noncontingent, and unliquidated amount of a Claimant’s claim, (ii) changes the nature or characterization of a Claimant’s claim, or (iii) adds a new claim with respect to a Claimant to the Schedules, the deadline by which creditors holding claims affected by such amendment must file a Proof of Claim will be

⁶ “503(b)(9) Claims” are Claims on account of goods received by a Debtor within 20 days before the Petition Date, where such goods were sold to the Debtor in the ordinary course of such Debtor’s business. See 11 U.S.C. § 503(b)(9).

the later of (x) the General Bar Date or (y) on the date that is twenty one (21) days from the date that the Debtors provide written notice to the affected creditor that the Schedules have been amended (the “**Amended Schedules Bar Date**” and, together with the General Bar Date, the Governmental Bar Date, and the Rejection Damages Bar Date, the “**Bar Dates**”).

19. Courts in this district have granted similar relief to the relief requested herein. *See, e.g., In re Hooters of America, LLC*, Case No. 25-80078 (SWE) (Bankr. N.D. Tex. Apr. 3, 2025) [Docket No. 99] (authorizing the debtors to serve a consolidated list of creditors and, amongst other things, approving the bar dates); *In re Stoli Group (USA) LLC*, Case No. 24-80146 (SWE) (Bankr. N.D. Tex. Dec. 3, 2024) [Docket No. 48] (authorizing the debtors to serve a consolidated list of creditors and, amongst other things, approving the bar dates).

20. Generally, claimants must submit a proof of claim to assert a claim in a bankruptcy proceeding. *See* 11 U.S.C. § 501(a). The Bar Dates proposed herein comply with the Bankruptcy Rules and the applicable provisions of the Bankruptcy Code, are appropriate, and thus should be approved. *First*, the General Claims Bar Date will be at least 30 days after the Debtors provide notice to claimants of such bar date. *Second*, the Governmental Claims Bar Date will be at least 180 days after the Petition Date, as required by section 502(b)(9) of the Bankruptcy Code. *Third*, the Rejection Damages Bar Date and Amended Schedules Bar Date is necessary to provide the Debtors with flexibility to handle situations in which a creditor’s claim status may change during these Chapter 11 Cases (such as in the event of contract or lease rejections or an amendment to the Debtors’ Schedules) or to ensure that creditors receive proper notice and an opportunity to assert a Claim. Accordingly, the Debtors request this Court establish the Bar Dates set forth herein.

E. Service of the Notice of Commencement, Bar Date Notice, and Proof of Claim Form

21. Bankruptcy Rule 2002(f) provides that notice of the order for relief shall be sent by mail to all creditors. *See* FED. R. BANKR. P. 2002(f). Subsection (a) further provides, in relevant

part, that “the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days’ notice by mail of: the meeting of creditors under § 341 or § 1104(b) of the Code.” FED. R. BANKR. P. 2002(a).

22. Through Kurtzman Carson Consultants, LLC d/b/a Verita Global (“**Verita**”), the Debtors’ proposed noticing, claims, and balloting agent, the Debtors propose to serve the notice of commencement, substantially in the form attached as Exhibit 1 to the Proposed Order attached hereto (the “**Notice of Commencement**”), on all parties listed on the Creditor Matrix to advise them (a) of the commencement of these Chapter 11 Cases, (b) the General Claims Bar Date and the Governmental Bar Date, and (c) that the meeting of creditors under section 341 of the Bankruptcy Code has not yet been set and may not occur. Service of the Notice of Commencement on the Creditor Matrix will not only avoid confusion among creditors but will prevent the Debtors’ estates from incurring unnecessary costs associated with serving multiple notices to the parties listed on the Debtors’ voluminous Creditor Matrix. Accordingly, service of the Notice of Commencement is warranted.

23. The Debtors further propose the following procedures for serving the Notice of Commencement and providing notice of the Bar Dates and for filing proofs of claim. Within seven (7) business days after entry of the Proposed Order, the Debtors propose to serve or cause to be served through Verita (a) the Notice of Commencement, substantially in the form attached as Exhibit 1 to the Proposed Order attached hereto, (b) a notice of the Bar Dates, substantially in the form attached as Exhibit 2 to the Proposed Order attached hereto (the “**Bar Date Notice**”); and (c) a proof of claim form, substantially in the form attached as Exhibit 3 to the Proposed Order attached hereto (the “**Proof of Claim Form**”). The Debtors intend to mail the Notice of Commencement, Bar Date Notice, and Proof of Claim Form by first-class mail, postage prepaid,

to (i) all holders of claims or potential claims; (ii) the Office of the United States Trustee for the Northern District of Texas; (iii) counsel to the official committee of unsecured creditors, if any; (iv) all parties that have requested notice in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002 as of the date of the entry of the Order; (v) all known creditors and other known holders of potential claims against any of the Debtors; (vi) all counterparties to executory contracts and unexpired leases of the Debtors listed in the Schedules or their designated representatives; (vii) all parties to pending litigation with the Debtors; (viii) all current and former employees of the Debtors whose employment ceased in two years prior to the Petition Date (to the extent that contact information for former employees is available in the Debtors' records); (ix) the Internal Revenue Service and all other taxing authorities for the jurisdictions in which the Debtors conduct business; (x) all relevant state attorneys general; (xi) all identified registered holders of any interests in any of the Debtors as of the Petition Date (although copies of the Proof of Claim Form will not be provided to them); (xii) all other entities listed on the Creditor Matrix; and (xiii) counsel to any of the foregoing, if known. After the Debtors file their Statements of Financial Affairs and Schedules of Assets and Liabilities (the "**Schedules**"), the Debtors also seek authorization to mail the Notice of Commencement, Bar Date Notice, and Proof of Claim Form, package by first-class United States mail, postage prepaid (or equivalent service) to any additional holders of claims or potential claims listed in the Debtors' schedules, as soon as practicable but no later than seven (7) business days after the Debtors file their schedules.

24. The Debtors may have potential claims against the Debtors that the Debtors have not been able to identify on the Schedules. Such unknown potential claims may include, for example: (a) claims of trade vendors that failed to submit invoices to the Debtors; (b) claims of persons or entities with potential unasserted causes of action against the Debtors; and (c) other

claims that, for various other reasons, are not recorded in the Debtors' books and records. Accordingly, the Debtors believe that: (a) it is appropriate to provide notice of the Bar Dates to these persons or entities whose names and addresses are unknown to the Debtors; and (b) it is advisable to provide supplemental notice to known holders of potential claims. Therefore, pursuant to Bankruptcy Rule 2002(1), the Debtors request authority to publish notice of the Bar Date Notice (the "**Publication Notice**") once in the national edition of the New York Times, Wall Street Journal, or similar nationally circulated news publication, as soon as practicable after entry of the Proposed Order, but no later than thirty (30) days before the General Bar Date, and such other local newspapers or publications, if any, as the Debtors deem appropriate. In the Debtors' judgment, such publication is likely to reach the widest possible audience of creditors who may not otherwise have notice of the Chapter 11 Cases.

25. The procedures and notice periods described herein afford creditors ample opportunity to file proofs of claim while at the same time ensuring that the Debtors can achieve certainty with respect to their liabilities in a timely manner. Accordingly, the Debtors submit that claimants will have, or should have, the information necessary to file proofs of claim in these Chapter 11 Cases as a result of the establishment of the Bar Dates and notice procedures requested herein.

V. **NOTICE**

26. The Debtors will provide notice of this Motion (a) the Office of the United States Trustee for the Northern District of Texas; (b) the United States Attorney's Officer for the Northern District of Texas; (c) the state attorney generals for all states in which the Debtors conduct or have recently conducted business; (d) the Internal Revenue Service, (e) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (f) Cozen O'Connor, as counsel to

the Senior DIP Lender and Plan Sponsor; (g) Kane Russell Coleman Logan PC, as counsel to the Junior DIP Lender; and (h) all parties in interest who have formally appeared and requested notice pursuant to Bankruptcy Rule 2002. The Debtors respectfully submit that no further notice of this Motion is required.

27. The pleadings in these Chapter 11 Cases and supporting papers are available on the Debtors' website at www.veritaglobal.net/HigherGround or on the Bankruptcy Court's website at <https://ecf.txnb.uscourts.gov/>. You can request any pleading you need from (i) the proposed noticing agent at: HigherGroundInfo@veritaglobal.com, (888) 733-1431 (U.S./Canada) (toll-free), +1 (310) 751-2632 (International), or (ii) proposed counsel for the Debtors at: Foley & Lardner LLP, 1144 15th Street, Suite 2200, Denver, CO 80202, Attn: Tim Mohan (tmohan@foley.com), and Foley & Lardner LLP, 1000 Louisiana Street, Suite 2000, Houston, Texas 77002, Attn: Nora McGuffey (nora.mcguiffey@foley.com) and Quynh-Nhu Truong (qtruong@foley.com).

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

DATED: June 18, 2025

Respectfully submitted by:

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**PROPOSED COUNSEL TO DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2025, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Nora J. McGuffey

Nora J. McGuffey

Exhibit A

Proposed Order

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

In re:	§	Chapter 11
	§	
Higher Ground Education, Inc., <i>et al.</i> , ¹	§	Case No.: 25-80121-11 (MVL)
	§	
Debtor.	§	(Joint Administration Requested)

**ORDER (I) AUTHORIZING THE DEBTORS TO SERVE A CONSOLIDATED
LIST OF CREDITORS; (II) AUTHORIZING THE DEBTORS TO REDACT
CERTAIN PERSONAL IDENTIFICATION INFORMATION; (III) APPROVING
THE FORM AND MANNER OF NOTIFYING CREDITORS OF THE
COMMENCEMENT OF THE DEBTORS' CHAPTER 11 CASES
AND BAR DATES; AND (IV) GRANTING RELATED RELIEF**

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal identification number, are: Higher Ground Education Inc. (7265); Guidepost A LLC (8540); Prepared Montessorian LLC (6181); Terra Firma Services LLC (6999); Guidepost Birmingham LLC (2397); Guidepost Bradley Hills LLC (2058); Guidepost Branchburg LLC (0494); Guidepost Carmel LLC (4060); Guidepost FIC B LLC (8609); Guidepost FIC C LLC (1518); Guidepost Goodyear LLC (1363); Guidepost Las Colinas LLC (9767); Guidepost Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); Guidepost St Robert LLC (5136); Guidepost The Woodlands LLC (6101); Guidepost Walled Lake LLC (9118); HGE FIC D LLC (6499); HGE FIC E LLC (0056); HGE FIC F LLC (8861); HGE FIC G LLC (5500); HGE FIC H LLC (8817); HGE FIC I LLC (1138); HGE FIC K LLC (8558); HGE FIC L LLC (2052); HGE FIC M LLC (8912); HGE FIC N LLC (6774); HGE FIC O LLC (4678); HGE FIC P LLC (1477); HGE FIC Q LLC (3122); HGE FIC R LLC (9661); LePort Emeryville LLC (7324); AltSchool II LLC (0403). The Debtors' mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.

Upon the motion (the “**Motion**”)² of Higher Ground Education, Inc. (“**HGE**”) and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) for entry of an order (this “**Order**”): (a) authorizing the Debtors to serve a consolidated creditor matrix and list of the 30 largest general unsecured creditors in lieu of submitting separate mailing matrices; (b) authorizing the Debtors to redact certain personal identification information; (c) approving the form and manner of notifying creditors of the commencement of the Debtors’ Chapter 11 Cases and bar dates; and (d) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “**Hearing**”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein, including cause exists to shorten the period set forth in section 502(b)(9); and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

2. The Debtors are authorized to file a single consolidated Creditor Matrix for these Chapter 11 Cases.

3. The Debtors are authorized to file a consolidated Top 30 List.

4. The Debtors are authorized to redact the home addresses of individuals listed on the Creditor Matrix or other documents filed with the Court. The Debtors shall provide an unredacted version of the Creditor Matrix and any other filings redacted pursuant to this Order to (x) the Court, the United States Trustee, and counsel to any official committee appointed in these Chapter 11 Cases, and (y) any party in interest, upon a request to the Debtors (email is sufficient) or to the Court that is reasonably related to these Chapter 11 Cases; *provided*, any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request. Any unredacted version of any document to be redacted pursuant to this Order shall include a header in bold with language putting the party in interest receiving the unredacted document on notice of this Court's Order and the redacted nature of the document. A copy of this Order shall be attached to the unredacted version of the matrix, and the unredacted version of the matrix shall include a header, or any other reasonable notice, with language putting the party in interest on notice of this Court's Order and the redacted nature of the publicly filed document. The Debtors shall inform the United States Trustee and the Court promptly after denying any request for an unredacted document pursuant to this Order.

5. **General Claims Bar Date.** Except as otherwise provided herein, all persons and entities including, without limitation, individuals, partnerships, corporations, joint ventures, and trusts, that assert a Claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors which arose before June 17, 2025 (the "**Petition Date**"), including claims pursuant to section

503(b)(9) of the Bankruptcy Code, shall submit a written proof of such Claim so that it is actually received on or before **August 7, 2025** (the “**General Claims Bar Date**”).

6. **Governmental Bar Date.** Proofs of Claim submitted by governmental units must be submitted so as to be actually received by the Bankruptcy Court on or before **December 15, 2025** (the “**Governmental Bar Date**”).

7. **Rejection Damages Bar Date.** Any person or entity that holds a Claim arising from the rejection of an executory contract or unexpired lease must submit a Proof of Claim based on such rejection on or before the later of (a) the General Claims Bar Date and (b) any date this Court may fix in the applicable order authorizing such rejection and, if no such date is provided, 30 days after the date of entry of such order (the “**Rejection Damages Bar Date**”). The Debtors will provide notice of the Rejection Damages Bar Date to the contract or lease counterparty whose contract or lease is being rejected at the time the Debtors reject any executory contract or unexpired lease.

8. **Amended Schedules Bar Date.** If the Debtors amend their Schedules, and such amendment (i) reduces the undisputed, noncontingent, and unliquidated amount of a Claimant’s claim, (ii) changes the nature or characterization of a Claimant’s claim, or (iii) adds a new claim with respect to a Claimant to the Schedules, the deadline by which creditors holding claims affected by such amendment must file a Proof of Claim will be the later of (x) the General Bar Date or (y) on the date that is twenty one (21) days from the date that the Debtors provide written notice to the affected creditor that the Schedules have been amended (the “**Amended Schedules Bar Date**” and, together with the General Bar Date, the Governmental Bar Date, and the Rejection Damages Bar Date, the “**Bar Dates**”).

9. Pursuant to Bankruptcy Rule 3003(c)(2), any person or entity that is required to file a proof of claim in these Chapter 11 Cases pursuant to the Bankruptcy Code, the Bankruptcy Rules or this Order with respect to a particular claim against the Debtors, but that fails to do so properly by the applicable Bar Date, shall not be treated as a creditor with respect to (i) such claim for purposes of voting upon any plan in these Chapter 11 Cases and (ii) distribution from property of the Debtors' estates.

10. The Debtors shall retain the right to (i) dispute or assert offsets or defenses against any filed proofs of claim, or any claim listed or reflected in their schedules, as to nature, amount, liability, classification, or otherwise; (ii) subsequently designate any scheduled claim as disputed, contingent, or unliquidated; and (iii) otherwise amend or supplement the schedules.

11. The forms of the Notice of Commencement, the Bar Date Notice, the Proof of Claim Form, and the manner of providing notice of the Bar Dates proposed in the Motion are hereby approved. The form and manner of notice of the Bar Dates approved herein satisfy the notice requirements of the Bankruptcy Code and the Bankruptcy Rules.

12. The Notice of Commencement, substantially in the form attached hereto as **Exhibit 1**, is hereby approved.

13. The Bar Dates Notice, substantially in the form attached hereto as **Exhibit 2**, is hereby approved.

14. The Proof of Claim Form, substantially in the form attached hereto as **Exhibit 3**, is hereby approved.

15. Within seven (7) days from entry of this Order or as soon as reasonably practicable thereafter, the Debtors shall serve or cause to be Served the Notice of Commencement, Bar Date Notice, and Proof of Claim Form by first-class mail, postage prepaid, on (a) all holders of claims

or potential claims; (b) the Office of the United States Trustee for the Northern District of Texas; (c) counsel to the official committee of unsecured creditors, if any; (d) all parties that have requested notice in these Chapter 11 Cases pursuant to Bankruptcy Rule 2002 as of the date of the entry of the Order; (e) all known creditors and other known holders of potential claims against any of the Debtors; (f) all counterparties to executory contracts and unexpired leases of the Debtors listed in the Schedules or their designated representatives; (g) all parties to pending litigation with the Debtors; (h) all current and former employees of the Debtors (to the extent that contact information for former employees is available in the Debtors' records); (i) the Internal Revenue Service and all other taxing authorities for the jurisdictions in which the Debtors conduct business; (j) all relevant state attorneys general; (k) all identified registered holders of any interests in any of the Debtors as of the Petition Date (although copies of the Proof of Claim Form will not be provided to them); (l) all other entities listed on the Creditor Matrix; and (m) counsel to any of the foregoing, if known. The Debtors may also mail the Notice of Commencement, Bar Date Notice, and Proof of Claim Form, package by first-class United States mail, postage prepaid (or equivalent service) to any additional holders of claims or potential claims listed in the Debtors' schedules, as soon as practicable but no later than seven (7) business days after the Debtors file their schedules.

16. Within seven (7) business days after entry of this Order, or as reasonably practicable thereafter, the Debtors will publish the Bar Date Notice in the national edition of the New York Times, Wall Street Journal, or similar nationally circulated news publication.

17. Entry of this Order is without prejudice to the right of the Debtors to seek a further order of this Court fixing the date by which holders of claims not subject to the Bar Dates established herein must file such claims against the Debtor or be forever barred from so doing.

18. Notice of the Motion, as provided therein, shall be deemed good and sufficient

notice of such Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

19. The Debtors and Verita are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

20. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

###END OF ORDER###

Submitted by:

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-and-

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-and-

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**PROPOSED COUNSEL TO DEBTORS
AND DEBTORS IN POSSESSION**

Exhibit 1

Proposed Notice of Commencement

Information to identify the case:

Debtor Higher Ground Education, Inc., et al. EIN ##-###7265
Name

United States Bankruptcy Court for the Northern District of Texas Date Case Filed for chapter 11 06/17/2025

Case Number 25-80121

Official Form 309F1 (For Corporations or Partnerships)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtor listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from the debtor by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

Confirmation of a chapter 11 plan may result in a discharge of debt. A creditor who wants to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadline specified in this notice. (See line 11 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>), or by visiting the Debtors' case website at www.veritaglobal.net/HigherGround.

The staff of the bankruptcy clerk's office cannot give legal advice.

Do not file this notice with any proof of claim or other filing in the case.

1. Debtor’s full name		See chart below	
2. All other names used in the last 8 years			
Debtor		Other Name(s)	
Jointly Administered Cases:			
DEBTOR	ADDRESS	CASE NO.	EIN
Higher Ground Education, Inc.	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80121	7265
Guidepost A LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80122	8540
Prepared Montessorian LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80123	6181
Terra Firma Services LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80124	6999
Guidepost Birmingham LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80125	2397
Guidepost Bradley Hills LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80126	2058
Guidepost Branchburg LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80127	0494
Guidepost Carmel LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80128	4060
Guidepost FIC B LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80129	8609
Guidepost FIC C LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80130	1518
Guidepost Goodyear LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80131	1363

Guidepost Las Colinas LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80132	9767
Guidepost Leawood LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80133	3453
Guidepost Muirfield Village LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80134	1889
Guidepost Richardson LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80135	7111
Guidepost South Riding LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80136	2403
Guidepost St Robert LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80137	5136
Guidepost The Woodlands LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80138	6101
Guidepost Walled Lake LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80139	9118
HGE FIC D LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80140	6499
HGE FIC E LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80141	0056
HGE FIC F LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80142	8861
HGE FIC G LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80143	5500
HGE FIC H LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80144	8817
HGE FIC I LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80145	1138
HGE FIC K LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80145	8558
HGE FIC L LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80147	2052
HGE FIC M LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80148	8912
HGE FIC N LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80149	6774
HGE FIC O LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80150	4678
HGE FIC P LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80151	1477
HGE FIC Q LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80152	3122
HGE FIC R LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80153	9661
LePort Emeryville LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80154	7324
AltSchool II LLC	1321 Upland Dr. PMB 20442, Houston, Texas 77043	25-80155	0403

3. Address

See chart above

4. Debtors' attorney (proposed)

Foley & Lardner LLP

Holland N. O'Neil (TX 14864700)
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201

Contact Phone: (214) 999-3000
honeil@foley.com

Foley & Lardner LLP

Timothy C. Mohan (pro hac vice forthcoming)
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201

Contact Phone: (720) 437-2000
tmohan@foley.com

Foley & Lardner LLP

Nora J. McGuffey (TX 24121000)
Quynh-Nhu Truong (TX 24137253)
1000 Louisiana Street, Suite 2000
Houston, TX 77002

Contact Phone: (713) 276-5500
nora.mcguffey@foley.com
qtruong@foley.com

5. Bankruptcy clerk's office

Documents in this case may be filed at this address:

Earle Cabell Federal Building
1100 Commerce St., Rm. 1254
Dallas, TX 75242-1496

Hours open: Monday through Friday 8:30 a.m. – 4:30 p.m.
Contact phone: (214) 753-2000

You may inspect all records filed in this case at this office or online at <https://pacer.uscourts.gov>, or by visiting the Debtors' case website at www.veritaglobal.net/HigherGround.

6. Meeting of creditors

The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.

Date: [July 28], 2025 at [10:30 a.m.] CT

Location: By telephone

Trustee: **United States Trustee**

Toll free number: **866-818-4670**

Alternate number: **203-480-2179**

Participant Code: **3304120**

Information can be found at the Debtors' case website, available at www.veritaglobal.net/HigherGround.

The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

7. Proof of claim deadline

Deadlines for filing proof of claim:

For all creditors (except a governmental unit): __/__/25

For a governmental unit: __/__/25

Information can be found at the Debtors' case website, available at www.veritaglobal.net/HigherGround.

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form may be obtained at www.uscourts.gov or any bankruptcy clerk's office.

Your claim will be allowed in the amount scheduled unless:

- your claim is designated as *disputed, contingent, or unliquidated*;
- you file a proof of claim in a different amount; or
- you receive another notice.

If your claim is not scheduled or if your claim is designated as disputed, contingent, or unliquidated, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

8. Exception to discharge deadline

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

8. Exception to discharge deadline

If § 523(c) applies to your claim and you seek to have it excepted from discharge, you must start a judicial proceeding by filing a complaint by the deadline stated below.

The bankruptcy clerk's office must receive a complaint and any required filing fee by the following deadline.

Deadline for filing the complaint: To be Determined.

9. Creditors with a foreign address

If you are a creditor receiving notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

10. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate its business.

11. Discharge of debts

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See 11 U.S.C. § 1141(d). A discharge means that creditors may never try to collect the debt from the debtor except as provided in the plan. If you want to have a particular debt owed to you excepted from the discharge and § 523(c) applies to your claim, you must start a judicial proceeding by filing a complaint and paying the filing fee in the bankruptcy clerk's office by the deadline.

If you have questions about this notice, please contact the Debtors' Claims and Noticing Agent, Kurtzman Carson Consultants LLC dba Verita Global ("Verita"), at (888) 733-1431 (U.S./Canada) or (310) 751-2632 (international), or submit an inquiry at www.veritaglobal.net/HigherGround/inquiry.

You may also find more information at www.veritaglobal.net/HigherGround.

Exhibit 2

Proposed Bar Date Notice

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

In re:	§	
	§	Chapter 11
Higher Ground Education, Inc., <i>et al.</i> , ¹	§	
	§	Case No.: 25-80121-11 (MVL)
Debtor.	§	
	§	(Joint Administration Requested)

NOTICE OF DEADLINE TO FILE PROOF OF CLAIM

TO ALL PERSONS OR ENTITIES WHO MAY HAVE CLAIMS AGAINST THE ABOVE-CAPTIONED DEBTORS:

On June 17, 2025 (the “**Petition Date**”), Higher Ground Education, Inc. (“**HGE**”) and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed voluntary petitions for relief under chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Northern District of Texas (the “**Court**”), thereby initiating the Chapter 11 Cases and creating their respective bankruptcy estates (the “**Estates**”). Set forth below are the name, case number, and last four digits of the federal tax identification number for each of the Debtors, if applicable.

<u>Debtor</u>	<u>Case Number</u>	<u>EID # (Last 4 Digits)</u>
Higher Ground Education, Inc.	25-80121	7265
Guidepost A LLC	25-80122	8540
Prepared Montessorian LLC	25-80123	6181
Terra Firma Services LLC	25-80124	6999
Guidepost Birmingham LLC	25-80125	2397
Guidepost Bradley Hills LLC	25-80126	2058
Guidepost Branchburg LLC	25-80127	0494
Guidepost Carmel LLC	25-80128	4060

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal identification number, are: Higher Ground Education Inc. (7265); Guidepost A LLC (8540); Prepared Montessorian LLC (6181); Terra Firma Services LLC (6999); Guidepost Birmingham LLC (2397); Guidepost Bradley Hills LLC (2058); Guidepost Branchburg LLC (0494); Guidepost Carmel LLC (4060); Guidepost FIC B LLC (8609); Guidepost FIC C LLC (1518); Guidepost Goodyear LLC (1363); Guidepost Las Colinas LLC (9767); Guidepost Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); Guidepost St Robert LLC (5136); Guidepost The Woodlands LLC (6101); Guidepost Walled Lake LLC (9118); HGE FIC D LLC (6499); HGE FIC E LLC (0056); HGE FIC F LLC (8861); HGE FIC G LLC (5500); HGE FIC H LLC (8817); HGE FIC I LLC (1138); HGE FIC K LLC (8558); HGE FIC L LLC (2052); HGE FIC M LLC (8912); HGE FIC N LLC (6774); HGE FIC O LLC (4678); HGE FIC P LLC (1477); HGE FIC Q LLC (3122); HGE FIC R LLC (9661); LePort Emeryville LLC (7324); AltSchool II LLC (0403). The Debtors’ mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.

<u>Debtor</u>	<u>Case Number</u>	<u>EID # (Last 4 Digits)</u>
Guidepost FIC B LLC	25-80129	8609
Guidepost FIC C LLC	25-80130	1518
Guidepost Goodyear LLC	25-80131	1363
Guidepost Las Colinas LLC	25-80132	9767
Guidepost Leawood LLC	25-80133	3453
Guidepost Muirfield Village LLC	25-80134	1889
Guidepost Richardson LLC	25-80135	7111
Guidepost South Riding LLC	25-80136	2403
Guidepost St. Robert LLC	25-80137	5136
Guidepost The Woodlands LLC	25-80138	6101
Guidepost Walled Lake LLC	25-80139	9118
HGE FIC D LLC	25-80140	6499
HGE FIC E LLC	25-80141	0056
HGE FIC F LLC	25-80142	8861
HGE FIC G LLC	25-80143	5500
HGE FIC H LLC	25-80144	8817
HGE FIC I LLC	25-80145	1138
HGE FIC K LLC	25-80145	8558
HGE FIC L LLC	25-80147	2052
HGE FIC M LLC	25-80148	8912
HGE FIC N LLC	25-80149	6774
HGE FIC O LLC	25-80150	4678
HGE FIC P LLC	25-80151	1477
HGE FIC Q LLC	25-80152	3122
HGE FIC R LLC	25-80153	9661
LePort Emeryville LLC	25-80154	7324
AltSchool II LLC	25-80155	0403

On [•], the Court entered an order [Docket No. •] (the “**Bar Date Order**”) in the Chapter 11 Cases establishing certain deadlines for filing proofs of claim. Pursuant to the Bar Date Order, the Court has established:

- **[August 7], 2025**, as the general bar date for filing prepetition claims in the Debtors’ Chapter 11 Cases (the “**General Claims Bar Date**”);
- **[December 15], 2025**, as the bar date for Governmental Units to file proofs of claim (the “**Governmental Bar Date**”); and
- the later of (i) the General Bar Date or the Governmental Bar Date, as applicable, and (ii) the date that is 30 days following service of an order approving the rejection of any executory contract or unexpired lease of the Debtors as the bar date for claimants asserting claims resulting from the Debtors’ rejection of an executory contract or unexpired to file proofs of claim for damages arising from such rejection (the “**Rejection Damages Bar Date**”).

- the later of (a) the General Bar Date or (b) on the date that is twenty-one (21) days from the date that the Debtors provide written notice to the affected creditor that the Schedules have been amended (the “**Amended Schedules Bar Date**”).

As used in this notice, the term “**claim**” means, as to or against any of the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

As used in this notice, the term “**entity**” has the meaning given to it in section 101(15) of the Bankruptcy Code and includes all persons, estates, trusts, and governmental units. In addition, the terms “persons” and “governmental units” are defined in sections 101(41) and 101(27) of the Bankruptcy Code, respectively.

THE BAR DATES

The Bar Date Order establishes the following bar dates for filing claims in the Chapter 11 Cases (collectively, the “**Bar Dates**”):

General Claims Bar Date. Pursuant to the Bar Date Order, except as described below, all persons or entities other than governmental units that hold claims (whether secured, unsecured, priority, or unsecured nonpriority, including section 503(b)(9) claims) against the Debtors that arose before the Petition Date must file proofs of claim so as to be **received on or before the General Bar Date** (*i.e.*, received by [August 7], 2025).

Governmental Bar Date. Pursuant to the Bar Date Order, except as described below, all governmental units holding claims (whether secured, unsecured, priority, or unsecured nonpriority, including section 503(b)(9) claims) against the Debtors that arose before the Petition Date must file proofs of claim so as to be **received on or before the Governmental Bar Date** (*i.e.*, received by [December 15], 2025).

Rejection Damages Bar Date. Pursuant to the Bar Date Order, except as described below, all persons or entities holding claims for damages arising from the rejection of any executory contract or unexpired lease of the Debtors must file proofs of claim with respect to such rejection so as to be **received on or before the Rejection Damages Bar Date**. Notwithstanding the foregoing, a party to an executory contract or unexpired lease that asserts a claim on account of unpaid amounts accrued and outstanding as of the Petition Date pursuant to such executory contract or unexpired lease (other than a rejection damages claim) must file a proof of claim for such amounts on or before the General Bar Date or the Governmental Bar Date, as applicable.

Amended Schedules Bar Date. Pursuant to the Bar Date Order, except as described below, if subsequent to the serving this Notice, the Debtors amend or supplement their Schedules (a) to reduce the undisputed, noncontingent, and liquidated amount of a claim listed in the Schedules, (b) to change the nature or classification of a claim against the Debtors reflected in the Schedules,

or (c) to add a new claim to the Schedules, the affected creditor is required to file a Proof of Claim or amend any previously filed Proof of Claim with respect of the amended scheduled claim so as to be **received on or before the Amended Schedules Bar Date**.

INSTRUCTIONS FOR FILING CLAIMS

The following persons or entities must file proofs of claim on or before the applicable Bar Date:

- any person or entity whose claim against a Debtor is not listed in the applicable Debtor's schedules or is listed in such Schedules as "contingent," "unliquidated," or "disputed" if such person or entity desires to participate in any of these Chapter 11 Cases or share in any distribution in any of these Chapter 11 Cases;
- any person or entity who believes that its claim is improperly classified in the Schedules or is listed in an incorrect amount and who desires to have its claim allowed in a different classification or amount other than that identified in the schedules;
- any person or entity who believes that its prepetition claim as listed in the schedules is not an obligation of the specific Debtor against which the claim is listed and who desires to have its claim allowed against a Debtor other than that identified in the schedules; and
- any person or entity who believes that its claim against a Debtor is or may be an administrative expense pursuant to section 503(b)(9) of the Bankruptcy Code.

The fact that you have received this notice does not mean that you have a claim or that the Debtors or the Court believe that you have a claim against the Debtors. You should not file a proof of claim if you do not have a claim against any of the Debtors.

Parties asserting claims against the Debtors that arose before the Petition Date, including section 503(b)(9) claims, must use the copy of the proof of claim form (the "**Proof of Claim Form**") included with this notice.

Persons and entities must file a proof of claim so that it is **received on or before the applicable Bar Date**. Proofs of claim may be submitted: (i) electronically through HGE's website, using the interface available on such website located at www.veritaglobal.net/HigherGround, or (ii) by delivering the original proof of claim to:

If by First-Class Mail, Hand Delivery, or Overnight Mail:
HGE Claims Processing
c/o Verita Global
222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245

Proofs of claim will be deemed filed when **actually received** by Kurtzman Carson Consultants, LLC d/b/a Verita Global ("**Verita**").

Proofs of claim **may not be delivered via facsimile or electronic mail transmission**. Any facsimile or electronic mail submissions will not be accepted.

Proofs of claim will be collected, docketed, and maintained by Verita. If you would like a copy of your proof of claim returned to you as proof of receipt, please enclose an additional copy of your proof of claim and a self-addressed postage-paid envelope.

All Proof of Claim Forms must be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant. The Proof of Claim Form must be completed in English and be denominated in United States currency. You should set forth with specificity the legal and factual basis for the alleged claim and attach to your completed Proof of Claim Form any documents on which the claim is based (or, if such documents are voluminous, attach a summary) or an explanation as to why the documents are not available.

Any person or entity asserting claims against multiple Debtors must file a separate proof of claim with respect to each Debtor. In addition, any person or entity filing a proof of claim must identify on its Proof of Claim Form the particular Debtor against which the person or entity asserts its claim. Any proof of claim filed under the Debtors' jointly administered case number in these Chapter 11 Cases or that otherwise fails to identify a Debtor shall be deemed as filed **only** against Debtor HGE. If an entity lists more than one Debtor on any one proof of claim, the relevant claims will be treated as filed **only** against the first listed Debtor.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

Pursuant to Bankruptcy Rule 3003(c)(2), any person or entity that is required to file a proof of claim in these Chapter 11 Cases pursuant to the Bankruptcy Code, the Bankruptcy Rules, or the Bar Date Order with respect to a particular claim against the Debtors, but that fails to do so properly by the applicable Bar Date, shall not be treated as a creditor with respect to such claim for purposes of (i) voting upon any plan in these Chapter 11 Cases and (ii) distribution from property of the Debtors' Estates.

ADDITIONAL INFORMATION

If you require additional information regarding the filing of a claim, you may contact at HigherGroundInfo@veritaglobal.com, (888) 733-1431 (U.S./Canada) (Toll-Free) or (310) 751-2632 (International) or by submitting an inquiry through the Debtors' case website at www.veritaglobal.net/HigherGround/Inquiry.

HGE cannot advise you how to file, or whether you should file, a claim. You may wish to consult an attorney regarding this matter.

Exhibit 3

Proposed Proof of Claim Form

United States Bankruptcy Court for the Northern District of Dallas Division

Indicate Debtor against which you assert a claim by checking the appropriate box below. **(Check only one Debtor per claim form.)**

- | | | |
|--|--|--|
| <input type="checkbox"/> Higher Ground Education, Inc. (Case No. 25-####-11) | <input type="checkbox"/> Guidepost Leawood LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC H LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost A LLC (Case No. 25-####-11) | <input type="checkbox"/> Guidepost Muirfield Village LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC I LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Prepared Montessorian LLC (Case No. 25-####-11) | <input type="checkbox"/> Guidepost Richardson LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC K LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Terra Firma Services LLC (Case No. 25-####-11) | <input type="checkbox"/> Guidepost South Riding LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC L LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost Birmingham LLC (Case No. 25-####-11) | <input type="checkbox"/> Guidepost St Robert LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC M LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost Bradley Hills LLC (Case No. 25-####-11) | <input type="checkbox"/> Guidepost The Woodlands LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC N LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost Branchburg LLC (Case No. 25-####-11) | <input type="checkbox"/> Guidepost Walled Lake LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC O LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost Carmel LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC D LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC P LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost FIC B LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC E LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC Q LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost FIC C LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC F LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC R LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost Goodyear LLC (Case No. 25-####-11) | <input type="checkbox"/> HGE FIC G LLC (Case No. 25-####-11) | <input type="checkbox"/> LePort Emeryville LLC (Case No. 25-####-11) |
| <input type="checkbox"/> Guidepost Las Colinas LLC (Case No. 25-####-11) | <input type="checkbox"/> AltSchool II LLC (Case No. 25-####-11) | |

Modified Official Form 410

Proof of Claim

12/24

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Other than a claim under 11 U.S.C. § 503(b)(9), this form should not be used to make a claim for an administrative expense arising after the commencement of the case.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

Part 1: Identify the Claim

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor

2. Has this claim been acquired from someone else?

☐ No

☐ Yes.

From whom?

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Name

Number Street

City

State

ZIP Code

Country

Contact phone

Contact email

Uniform claim identifier (if you use one):

Where should payments to the creditor be sent? (if different)

Name

Number Street

City

State

ZIP Code

Country

Contact phone

Contact email

4. Does this claim amend one already filed?

☐ No

☐ Yes.

Claim number on court claims registry (if known)

Filed on

MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☐ No

☐ Yes.

Who made the earlier filing?

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?** ☐ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. **How much is the claim?** \$ _____. **Does this amount include interest or other charges?**
☐ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?** Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. **Is all or part of the claim secured?** ☐ No
☐ Yes. The claim is secured by a lien on property.
Nature of property:
☐ Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. **Is this claim based on a lease?** ☐ No
☐ Yes. **Amount necessary to cure any default as of the date of the petition.** \$ _____

11. **Is this claim subject to a right of setoff?** ☐ No
☐ Yes. Identify the property: _____

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Exhibit A - Proposed Order Page 24 of 26

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☐ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies. \$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

☐ No

☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
- ☐ I am the creditor's attorney or authorized agent.
- ☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- ☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code Country

Contact phone _____ Email _____

Modified Official Form 410

Instructions for Proof of Claim

United States Bankruptcy Court

12/24

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.

- Fill in the caption at the top of the form

- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.

- Attach any supporting documents to this form.
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)

Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).

- Do not attach original documents because attachments may be destroyed after scanning.

- If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:

Higher Ground Education Claims Processing Center
c/o KCC dba Verita Global
222 N. Pacific Coast Hwy., Ste. 300
El Segundo, CA 90245

Alternatively, your claim can be filed electronically on Verita's website at <https://www.veritaglobal.net/higherground>

- A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth. See Bankruptcy Rule 9037.

- For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.
For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may view a list of filed claims in this case by visiting the Claims and Noticing and Agent's website at <https://www.veritaglobal.net/higherground>

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate.
11 U.S.C. § 503.

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. §101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Do not file these instructions with your form.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Uniform claim identifier: An optional 24-character identifier that some creditors use to facilitate payment.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.