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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) |
| | § | |
| Debtors. | § | (Jointly Administered) |

**NOTICE OF FILING OF REVISED PROPOSED ORDER
GRANTING CHAPTER 11 COMPLEX CASE TREATMENT**

PLEASE TAKE NOTICE that on June 18, 2025, Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “Debtors”), filed *Notice of Designation as Complex Chapter 11 Bankruptcy Case* [Docket No. 3] (the “**Complex Case Notice**”), which attached the proposed *Order Granting Chapter 11 Complex Case Treatment* as Exhibit A (the “**Proposed Order**”).

PLEASE TAKE FURTHER NOTICE that annexed hereto as Exhibit A is the Debtors’ revised version of the Proposed Order (the “**Revised Proposed Order**”).

PLEASE TAKE FURTHER NOTICE that annexed hereto as Exhibit B is a redline of the Debtors’ Revised Proposed Order against the Proposed Order filed at Docket No. 3-1.

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.



PLEASE TAKE FURTHER NOTICE that the form of order annexed hereto may be revised or amended prior to the hearing on the Complex Case Notice.

DATED: June 20, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700)

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 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

Revised Proposed Order

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

| | | |
|---|---------------------------------|---|
| <hr style="border: 0.5px solid black;"/> <p>In re:</p> <p>Higher Ground Education, Inc., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtor.</p> <hr style="border: 0.5px solid black;"/> | § § § § § § § | Chapter 11 Case No.: 25-80121-11 (MVL) (Jointly Administered) |
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ORDER GRANTING CHAPTER 11 COMPLEX CASE TREATMENT

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.

The above-captioned chapter 11 cases (collectively, the “**Chapter 11 Cases**”) were filed on June 17, 2025, by Higher Ground Education, Inc. (“**HGE**”) and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”). A *Notice of Designation as Complex Chapter 11 Bankruptcy Case* was filed on the same date. After review of the initial pleadings filed in these Chapter 11 Cases, the Court concludes that these Chapter 11 Cases appear to be complex chapter 11 cases and warrant the following treatment. Accordingly, unless the court orders otherwise, **IT IS HEREBY ORDERED THAT:**

1. The Motion is granted on a final basis as set forth herein.
2. The *Procedures for Complex Cases in the Northern District of Texas* (the “**Complex Case Procedures**”) and the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas* (the “**Local Rules**”) shall apply to and govern these Chapter 11 Cases. Compliance with the Complex Case Procedures is required for all hearing, notice, and objection procedures. The Complex Case Procedures can be found on the Court’s website at: <https://www.txnb.uscourts.gov/complex-case-procedures>. If a conflict exists between the Local Rules and the Complex Case Procedures, the Complex Case Procedures shall govern.
3. The Court sets the following dates and times for the next three months as the pre-set hearing dates and times for hearing all motions and other matters in these Chapter 11 Cases:
 - **July 21, 2025, at 9:30 a.m. (CT);**
 - **August 8, 2025, at 9:30 a.m. (CT);**
 - **September 3, 2025, at 9:30 a.m. (CT); and**
 - **September 24, 2025, at 9:30 a.m. (CT).**
4. The Debtors (or their agent) shall give notice of this Order to all parties in interest within seven (7) days of entry of the Order. If any party in interest objects to the provisions of this Order, that party may file an appropriate motion articulating the objection and the relief requested

within fourteen (14) days after service of the Order. After hearing the objection and any responses, the Court may reconsider any part of this Order and may grant relief, if appropriate.

###END OF ORDER###

Submitted by:

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**PROPOSED COUNSEL TO DEBTORS
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Exhibit B

Redline of Revised Proposed Order

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

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| <hr style="border: 0.5px solid black;"/> <p>In re:</p> <p>Higher Ground Education, Inc., <i>et al.</i>,¹</p> <p style="text-align: center;">Debtor.</p> <hr style="border: 0.5px solid black;"/> | § § § § § § § | <p>Chapter 11</p> <p>Case No.: 25-80121-11 (MVL)</p> <p>(Joint Administration Requested) <u>Jointly Administered</u></p> |
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ORDER GRANTING CHAPTER 11 COMPLEX CASE TREATMENT

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4. ~~3.~~ The Debtors (or their agent) shall give notice of this Order to all parties in interest within seven (7) days of entry of the Order. If any party in interest objects to the provisions of this Order, that party may file an appropriate motion articulating the objection and the relief requested

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| Summary report: Litera Compare for Word 11.7.0.54 Document comparison done on 6/20/2025 4:28:36 PM | |
| Style name: Default Style | |
| Intelligent Table Comparison: Active | |
| Original DMS: nd://4915-3695-6944/4/HGE (Order) Notice of Designation of Complex Ch 11 Case.docx | |
| Modified DMS: nd://4900-1273-0703/1/HGE - Revised Order on Notice of Designation of Complex Ch 11 Case.docx | |
| Changes: | |
| <u>Add</u> | 13 |
| Delete | 3 |
| Move From | 0 |
| <u>Move To</u> | 0 |
| <u>Table Insert</u> | 0 |
| Table Delete | 0 |
| <u>Table moves to</u> | 0 |
| Table moves from | 0 |
| Embedded Graphics (Visio, ChemDraw, Images etc.) | 0 |
| Embedded Excel | 0 |
| Format changes | 0 |
| Total Changes: | 16 |