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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 (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**

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 *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* [Docket No. 5] (the “**Creditor Matrix Motion**”), which attached the proposed *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*

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.



Notifying Creditors of the Commencement of the Debtors' Chapter 11 Cases and Bar Dates; and (IV) Granting Related Relief 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. 5-1.

PLEASE TAKE FURTHER NOTICE that the form of order annexed hereto may be revised or amended prior to the hearing on the Creditor Matrix Motion.

DATED: June 20, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700)

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

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**

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

**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 503(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 or June 18, 2025 (collectively, 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 for the jurisdictions in which the Debtors conduct business; (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) known 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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**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 81-1437265
NameUnited States Bankruptcy Court for the Northern District of Texas Date Case Filed for chapter 1106/17/2025Case Number 25-80121 (MVL)**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	See Schedule 1 attached		
Jointly Administered Cases:			
DEBTOR	ADDRESS	CASE NO.	EIN
Higher Ground Education, Inc.	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80121 (MVL)	81-1437265
Guidepost A LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80122 (MVL)	81-3368540
Prepared Montessorian LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80123 (MVL)	83-3086181
Terra Firma Services LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80124 (MVL)	84-3506999
Guidepost Birmingham LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80125 (MVL)	88-2202397
Guidepost Bradley Hills LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80126 (MVL)	88-2442058
Guidepost Branchburg LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80127 (MVL)	88-2270494
Guidepost Carmel LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80128 (MVL)	93-3804060
Guidepost FIC B LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80129 (MVL)	81-4078609
Guidepost FIC C LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80130 (MVL)	81-1391518
Guidepost Goodyear LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80131 (MVL)	93-2611363
Guidepost Las Colinas LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80132 (MVL)	93-2589767
Guidepost Leawood LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80133 (MVL)	88-2343453
Guidepost Muirfield Village LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80134 (MVL)	99-2261889

Guidepost Richardson LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80135 (MVL)	99-2737111
Guidepost South Riding LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80136 (MVL)	88-2582403
Guidepost St Robert LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80137 (MVL)	93-2555136
Guidepost The Woodlands LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80138 (MVL)	99-2346101
Guidepost Walled Lake LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80139 (MVL)	99-4729118
HGE FIC D LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80140 (MVL)	82-3316499
HGE FIC E LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80141 (MVL)	82-4400056
HGE FIC F LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80142 (MVL)	82-4558861
HGE FIC G LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80143 (MVL)	82-5505500
HGE FIC H LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80144 (MVL)	84-2428817
HGE FIC I LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80145 (MVL)	85-0821138
HGE FIC K LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80146 (MVL)	85-1518558
HGE FIC L LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80147 (MVL)	87-4242052
HGE FIC M LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80148 (MVL)	87-4688912
HGE FIC N LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80149 (MVL)	88-0806774
HGE FIC O LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80150 (MVL)	88-1094678
HGE FIC P LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80151 (MVL)	88-1111477
HGE FIC Q LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80152 (MVL)	88-1133122
HGE FIC R LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80153 (MVL)	88-1159661
LePort Emeryville LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80154 (MVL)	47-4117324
AltSchool II LLC	1321 Upland Dr. PMB 20442 Houston, Texas 77043	25-80155 (MVL)	84-3500403

3. Address

See chart above

4. Debtors' attorney (proposed)

Foley & Lardner LLP

Holland N. O'Neil (TX 14864700)
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1000 Louisiana Street, Suite 2000
Houston, TX 77002

Contact Phone: (713) 276-5500
nora.mcguffey@foley.com
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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): 08/07/25

For a governmental unit: 12/15/25

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.

All Other Names Debtors Used in the Last 8 Years

Debtor	Case No.	All Other Names Debtors Used in the Last 8 Years
Higher Ground Education, Inc.	25-80121	HGE Altitude Learning TinyCare NeighborSchools Montessorium Beacon Elementary
Guidepost A LLC	25-80122	Guidepost Montessori Academy of Thought and Industry Guidepost Academy ATI TinyCare NeighborSchools
Prepared Montessorian LLC	25-80123	Prepared Montessorian Institute PMI
Terra Firma Services LLC	25-80124	
Guidepost Birmingham LLC	25-80125	Guidepost Montessori Guidepost Montessori Birmingham Guidepost Montessori at Birmingham
Guidepost Bradley Hills LLC	25-80126	Guidepost Montessori Guidepost Montessori Bradley Hills Guidepost Montessori at Bradley Hills
Guidepost Branchburg LLC	25-80127	Guidepost Montessori Guidepost Montessori at Branchburg Guidepost Montessori Branchburg
Guidepost Carmel LLC	25-80128	Guidepost Montessori Guidepost Montessori Carmel Guidepost Montessori at Carmel
Guidepost FIC B LLC	25-80129	Guidepost Montessori Guidepost Montessori Foothill Ranch Guidepost Montessori at Foothill Ranch Guidepost Montessori Wicker Park Guidepost Montessori at Wicker Park Guidepost Montessori Timber Ridge Guidepost Montessori at Timber Ridge
Guidepost FIC C LLC	25-80130	Guidepost Montessori Guidepost Montessori Copper Hill Guidepost Montessori at Copper Hill Guidepost Montessori Las Flores Guidepost Montessori at Las Flores Guidepost Montessori Williamsburg Guidepost Montessori at Williamsburg
Guidepost Goodyear LLC	25-80131	Guidepost Montessori Guidepost Montessori Goodyear Guidepost Montessori at Goodyear
Guidepost Las Colinas LLC	25-80132	Guidepost Montessori Guidepost Montessori Las Colinas Guidepost Montessori at Las Colinas
Guidepost Leawood LLC	25-80133	Guidepost Montessori Guidepost Montessori at Leawood Guidepost Montessori Leawood
Guidepost Muirfield Village LLC	25-80134	Guidepost Montessori Guidepost Montessori at Muirfield Village Guidepost Montessori Muirfield Village

All Other Names Debtors Used in the Last 8 Years

Debtor	Case No.	All Other Names Debtors Used in the Last 8 Years
Guidepost Richardson LLC	25-80135	Guidepost Montessori Guidepost Montessori Richardson Guidepost Montessori at Richardson
Guidepost South Riding LLC	25-80136	Guidepost Montessori Guidepost Montessori at South Riding Guidepost Montessori South Riding
Guidepost St. Robert LLC	25-80137	Guidepost Montessori Guidepost Montessori St. Robert Guidepost Montessori at St. Robert
Guidepost The Woodlands LLC	25-80138	Guidepost Montessori Guidepost Montessori The Woodlands Guidepost Montessori at The Woodlands
Guidepost Walled Lake LLC	25-80139	
HGE FIC D LLC	25-80140	Guidepost Montessori Guidepost Montessori Flower Mound Guidepost Montessori at Flower Mound Guidepost Montessori West Loop Guidepost Montessori at West Loop Guidepost Montessori Magnificent Mile Guidepost Montessori at Magnificent Mile
HGE FIC E LLC	25-80141	Guidepost Montessori Guidepost Academy Guidepost Montessori & Academy Academy of Thought and Industry ATI Guidepost Montessori Peoria Guidepost Montessori at Peoria Guidepost Montessori Hollywood Beach Guidepost Montessori at Hollywood Beach Guidepost Montessori Stonebriar Guidepost Montessori at Stonebriar Academy of Thought and Industry Hollywood Beach Academy of Thought and Industry at Hollywood Beach ATI Hollywood Beach ATI at Hollywood Beach Guidepost Academy Hollywood Beach Guidepost Academy at Hollywood Beach Guidepost Montessori & Academy at Hollywood Beach Guidepost Montessori & Academy Hollywood Beach

All Other Names Debtors Used in the Last 8 Years

Debtor	Case No.	All Other Names Debtors Used in the Last 8 Years
HGE FIC F LLC	25-80142	Guidepost Montessori Academy of Thought and Industry ATI Polis World Schools Guidepost Academy Guidepost Montessori Plum Canyon Guidepost Montessori at Plum Canyon Guidepost Montessori Naperville Guidepost Montessori at Naperville Guidepost Montessori East Village Guidepost Montessori at East Village Guidepost Montessori Columbus Village Guidepost Montessori at Columbus Village Guidepost Montessori at Museum Mile Guidepost Montessori Museum Mile Guidepost Academy at Museum Mile Guidepost Academy Museum Mile Polis World Schools Manhattan Polis World Schools Manhattan: Museum Mile Polis World Schools Manhattan: Columbus Square Guidepost Montessori South Naperville Guidepost Montessori at South Naperville
HGE FIC G LLC	25-80143	Guidepost Montessori Academy of Thought and Industry ATI Guidepost Montessori Mahwah Guidepost Montessori at Mahwah Guidepost Montessori Laurel Oak Guidepost Montessori at Laurel Oak Academy of Thought and Industry St. Louis ATI St. Louis Academy of Thought and Industry at St. Louis Guidepost Montessori Lake Norman Guidepost Montessori at Lake Norman Guidepost Montessori Brooklyn Heights Guidepost Montessori at Brooklyn Heights Guidepost Montessori South Boston Guidepost Montessori at South Boston
HGE FIC H LLC	25-80144	Guidepost Montessori Guidepost Montessori Edgewater Guidepost Montessori at Edgewater Guidepost Montessori Lincoln Park Guidepost Montessori at Lincoln Park

All Other Names Debtors Used in the Last 8 Years

Debtor	Case No.	All Other Names Debtors Used in the Last 8 Years
HGE FIC I LLC	25-80145	Guidepost Montessori Guidepost Academy Guidepost Montessori & Academy Guidepost Montessori Burr Ridge Guidepost Montessori at Burr Ridge Guidepost Montessori Baymeadows Guidepost Montessori at Baymeadows Guidepost Montessori Deerbrook Guidepost Montessori at Deerbrook Guidepost Montessori Briarwood Guidepost Montessori at Briarwood Guidepost Montessori Downtown Naperville Guidepost Montessori at Downtown Naperville Guidepost Montessori Evanston Guidepost Montessori at Evanston Guidepost Montessori Hollywood Beach East Guidepost Montessori at Hollywood Beach East Academy of Thought and Industry at Hollywood Beach East ATI Hollywood Beach East Academy of Thought and Industry Hollywood Beach East Guidepost Academy Hollywood Beach East Guidepost Academy at Hollywood Beach East Guidepost Montessori & Academy Hollywood Beach East Guidepost Montessori & Academy at Hollwood Beach East Guidepost Montessori Hallandale Beach Guidepost Montessori at Hallandale Beach Guidepost Montessori Logan Square Guidepost Montessori at Logan Square Guidepost Montessori Oak Brook Guidepost Montessori at Oak Brook Guidepost Montessori Palm Beach Gardens Guidepost Montessori at Palm Beach Gardens Guidepost Montessori Worthington Guidepost Montessori at Worthington
HGE FIC K LLC	25-80146	Guidepost Montessori Guidepost Montessori Westlake Guidepost Montessori at Westlake

All Other Names Debtors Used in the Last 8 Years

Debtor	Case No.	All Other Names Debtors Used in the Last 8 Years
HGE FIC L LLC	25-80147	Guidepost Montessori Guidepost Montessori Bridgewater Guidepost Montessori at Bridgewater Guidepost Montessori Burke Guidepost Montessori at Burke Guidepost Montessori Centennial Guidepost Montessori at Centennial Guidepost Montessori at Downtown Boston Guidepost Montessori Downtown Boston Guidepost Montessori Beacon Hill Guidepost Montessori at Beacon Hill Guidepost Montessori Kendall Park Guidepost Montessori at Kendall Park Guidepost Montessori Lloyd District Guidepost Montessori at Lloyd District Guidepost Montessori Legacy Guidepost Montessori at Legacy Guidepost Montessori Lynnwood Guidepost Montessori at Lynnwood Guidepost Montessori at Old Town Guidepost Montessori Old Town Guidepost Montessori Princeton Meadows Guidepost Montessori at Princeton Meadows Guidepost Montessori Paradise Valley Guidepost Montessori at Paradise Valley Guidepost Montessori San Rafael Guidepost Montessori at San Rafael
HGE FIC M LLC	25-80148	Guidepost Montessori Guidepost Montessori Brasswood Guidepost Montessori at Brasswood Guidepost Montessori Celebration Park Guidepost Montessori at Celebration Park Guidepost Montessori Downers Grove Guidepost Montessori at Downers Grove Guidepost Montessori Gear Lake Guidepost Montessori at Gear Lake Guidepost Montessori Leavenworth Guidepost Montessori at Leavenworth Guidepost Montessori River North Guidepost Montessori at River North

All Other Names Debtors Used in the Last 8 Years

Debtor	Case No.	All Other Names Debtors Used in the Last 8 Years
HGE FIC N LLC	25-80149	Guidepost Montessori Guidepost Academy Guidepost Montessori & Academy Guidepost Montessori Kent Guidepost Montessori at Kent Guidepost Montessori Lake Clark Shores Guidepost Montessori at Lake Clark Shores Guidepost Montessori Lake Clark Guidepost Montessori at Lake Clark Guidepost Montessori North Wales Guidepost Montessori at North Wales Guidepost Montessori Riverside Guidepost Montessori at Riverside Guidepost Academy Riverside Guidepost Academy at Riverside Guidepost Montessori & Academy Riverside Guidepost Montessori & Academy at Riverside
HGE FIC O LLC	25-80150	Guidepost Montessori Guidepost Montessori at Severna Park Guidepost Montessori Severna Park
HGE FIC P LLC	25-80151	Guidepost Montessori Guidepost Montessori St. Augustine Guidepost Montessori at St. Augustine
HGE FIC Q LLC	25-80152	Guidepost Montessori Guidepost Montessori Kentwood Guidepost Montessori at Kentwood
HGE FIC R LLC	25-80153	Guidepost Montessori Guidepost Montessori Rockville Guidepost Montessori at Rockville
LePort Emeryville LLC	25-80154	Guidepost Montessori Guidepost Montessori Emeryville Guidepost Montessori at Emeryville LePort Montessori Emeryville LePort Montessori at Emeryville
AltSchool II, LLC	25-80155	AltSchools

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.	§	(Jointly Administered)

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.)**

- | | | |
|--|--|--|
| ☐ Higher Ground Education, Inc. (Case No. 25-80121) | ☐ Guidepost Leawood LLC (Case No. 25-80133) | ☐ HGE FIC I LLC (Case No. 25-80145) |
| ☐ Guidepost A LLC (Case No. 25-80122) | ☐ Guidepost Muirfield Village LLC (Case No. 25-80134) | ☐ HGE FIC K LLC (Case No. 25-80146) |
| ☐ Prepared Montessorian LLC (Case No. 25-80123) | ☐ Guidepost Richardson LLC (Case No. 25-80135) | ☐ HGE FIC L LLC (Case No. 25-80147) |
| ☐ Terra Firma Services LLC (Case No. 25-80124) | ☐ Guidepost South Riding LLC (Case No. 25-80136) | ☐ HGE FIC M LLC (Case No. 25-80148) |
| ☐ Guidepost Birmingham LLC (Case No. 25-80125) | ☐ Guidepost St Robert LLC (Case No. 25-80137) | ☐ HGE FIC N LLC (Case No. 25-80149) |
| ☐ Guidepost Bradley Hills LLC (Case No. 25-80126) | ☐ Guidepost The Woodlands LLC (Case No. 25-80138) | ☐ HGE FIC O LLC (Case No. 25-80150) |
| ☐ Guidepost Branchburg LLC (Case No. 25-80127) | ☐ Guidepost Walled Lake LLC (Case No. 25-80139) | ☐ HGE FIC P LLC (Case No. 25-80151) |
| ☐ Guidepost Carmel LLC (Case No. 25-80128) | ☐ HGE FIC D LLC (Case No. 25-80140) | ☐ HGE FIC Q LLC (Case No. 25-80152) |
| ☐ Guidepost FIC B LLC (Case No. 25-80129) | ☐ HGE FIC E LLC (Case No. 25-80141) | ☐ HGE FIC R LLC (Case No. 25-80153) |
| ☐ Guidepost FIC C LLC (Case No. 25-80130) | ☐ HGE FIC F LLC (Case No. 25-80142) | ☐ LePort Emeryville LLC (Case No. 25-80154) |
| ☐ Guidepost Goodyear LLC (Case No. 25-80131) | ☐ HGE FIC G LLC (Case No. 25-80143) | ☐ AltSchool II LLC (Case No. 25-80155) |
| ☐ Guidepost Las Colinas LLC (Case No. 25-80132) | ☐ HGE FIC H LLC (Case No. 25-80144) | |

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? _____	

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 <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . ☐ 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: _____

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

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ 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.

Amount entitled to priority

\$

\$

\$

\$

\$

\$

* 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 nameMiddle nameLast name

Title

Company

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

Address

NumberStreet

CityStateZIP CodeCountry

Contact phoneEmail

Modified Official Form 410 Proof of Claim page 3

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.

Claim Pursuant to 11 U.S.C. § 503(b)(9). A 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 the Debtor's business. Attach documentation supporting such claim.

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.

Exhibit B

Redline of Revised 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 <u>Jointly Administered</u>)

**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**

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.

AND BAR DATES; AND (IV) GRANTING RELATED RELIEF

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~~503(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:**

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

1. The Motion is granted as set forth herein.
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 (~~or June 18, 2025~~ collectively, 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~~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 for the jurisdictions in which the Debtors conduct business; (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) known 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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**PROPOSED COUNSEL TO DEBTORS
AND DEBTORS IN POSSESSION**

Exhibit 1

Proposed Notice of Commencement

Exhibit 2

Proposed Bar Date Notice

Exhibit 3

Proposed Proof of Claim Form

Summary report: Litera Compare for Word 11.7.0.54 Document comparison done on 6/20/2025 3:05:04 PM	
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Intelligent Table Comparison: Active	
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Modified DMS: nd://4896-2725-3010/4/HGE (Order) Creditor Matrix and Bar Date Motion.docx	
Changes:	
<u>Add</u>	6
Delete	4
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:	10