

Holland N. O'Neil (TX 14864700)  
Thomas C. Scannell (TX 24070559)  
**FOLEY & LARDNER LLP**  
2021 McKinney Avenue, Suite 1600  
Dallas, TX 75201  
Telephone: (214) 999-3000  
Facsimile: (214) 999-4667  
[honeil@foley.com](mailto:honeil@foley.com)  
[tscannell@foley.com](mailto:tscannell@foley.com)

Timothy C. Mohan  
(*pro hac vice* forthcoming)  
**FOLEY & LARDNER LLP**  
1144 15th Street, Suite 2200  
Denver, CO 80202  
Telephone: (720) 437-2000  
Facsimile: (720) 437-2200  
[tmohan@foley.com](mailto:tmohan@foley.com)

Nora J. McGuffey (TX 24121000)  
Quynh-Nhu Truong (TX 24137253)  
**FOLEY & LARDNER LLP**  
1000 Louisiana Street, Suite 2000  
Houston, TX 77002  
Telephone: (713) 276-5500  
Facsimile: (713) 276-5555  
[nora.mcguffey@foley.com](mailto:nora.mcguffey@foley.com)  
[qtruong@foley.com](mailto:qtruong@foley.com)

**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> , <sup>1</sup>	§	Case No.: 25-80121-11 (MVL)
	§	
Debtors.	§	(Joint Administration Requested)

---

**AGENDA FOR MATTERS SCHEDULED FOR  
HEARING TO BE HELD ON JULY 21, 2025, AT 9:30 A.M.**

---

Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby file their agenda for the hearing on **Monday, July 21, 2025, at 9:30 A.M. (prevailing Central Time)**, before the Honorable Michelle V. Larson, U.S. Bankruptcy Judge for the Northern District of Texas (the “Hearing”). The Debtors will ask the Court to consider the following:

---

<sup>1</sup> 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.



**I. Matters to be Heard:**

**A. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefits Programs, and (II) Grant Related Relief [Docket No. 12; Filed on 6/18/2025]***

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
- b. *Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 61];*
- c. *Notice of Filing of Proposed Final Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses, (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 197].*

ii. Response Deadline: Prior to the Hearing.

iii. Responses: None

iv. Status: This matter will go forward.

**B. *Debtors' Emergency Motion for Entry of an Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Docket No. 13; Filed on 6/18/2025]***

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
- b. *Interim Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Docket No. 62];*
- c. *Notice of Filing of Proposed Final Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C)*

*Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Docket No. 198].*

- ii. Response Deadline: Prior to the Hearing.
- iii. Responses: None
- iv. Status: This matter will go forward.

**C. *Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from 2HR Learning, Inc.; (B) Obtain PostPetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 14; Filed on 6/18/2025]***

- i. Related Documents:
  - a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*
  - b. *Interim Order Authorizing Debtor to (A) Obtain Postpetition Secured Financing from YYYYY, LLC; (B) Obtain Postpetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing and (V) Granting Related Relief [Docket No. 63];*
  - c. *Supplemental Declaration of Jonathan McCarthy in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from YYYYY, LLC; (B) Obtain PostPetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief (to be filed prior to the Hearing); and*
  - d. *Notice of Filing of Final Order Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from YYYYY, LLC (B) Obtain Postpetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic*

*Stay; and (IV) Granting Certain Related Relief* (to be filed prior to the Hearing).

ii. Response Deadline: Prior to the Hearing.

iii. Responses:

a. *Joint Limited Objection of the Texas Taxing Authorities to the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from 2HR Learning, Inc.; (B) Obtain PostPetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 171]; and*

(i) *Notice of Withdrawal of Joint Limited Objection of the Texas Taxing Authorities to the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from 2HR Learning, Inc.; (B) Obtain PostPetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 189].*

b. *United States Trustee's Objection of the Texas Taxing Authorities to the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Senior Secured Financing from 2HR Learning, Inc.; (B) Obtain PostPetition Junior Secured Financing from Guidepost Global Education, Inc.; (C) Utilize Cash Collateral; and (D) Pay Certain Related Fees and Charges; (II) Granting Adequate Protection to the Prepetition Lender; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 182].*

iv. Status: This matter will go forward.

**D. *Debtors' Motion for Entry of an Order (I) Authorizing and Approving Assumption of the Restructuring Support Agreement, and (II) Granting Related Relief [Docket No. 93; Filed on 6/26/2025]***

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15]; and
- b. *Notice of Filing of Proposed Order Granting, in Part, Motion to Assume Restructuring Support Agreement* [Docket No. 199].
- ii. Response Deadline: July 21, 2025.
- iii. Responses: None
- iv. Status: This matter will go forward.

**II. Witness and Exhibits Lists:**

- A. *Debtors' Witness and Exhibit List for July 21, 2025 Hearing* [Docket No. 194];
- B. *Witness and Exhibit List* [Docket No. 195];
- C. *The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearings Scheduled on July 21, 2025* [Docket No. 196]; and
- D. *Debtors' Amended Witness and Exhibit List for July 21, 2025 Hearing* [Docket No. 201].

**III. Notices of Hearing:**

- A. *Third Amended Notice of Hearing* [Docket No. 191].

**IV. Certificates of Service:**

- A. *Certificate of Service* re: Docket Nos. 12, 13, 14 [Docket No. 34];
- B. *Certificate of Service* re: Docket Nos. 61, 62, 63 [Docket No. 100]; and
- C. *Certificate of Service* re: Docket No. 93 [Docket No. 110].

DATED: July 18, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700)

Thomas C. Scannell (TX 24070559)

**FOLEY & LARDNER LLP**

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000

Facsimile: (214) 999-4667

[honeil@foley.com](mailto:honeil@foley.com)

[tscannell@foley.com](mailto:tscannell@foley.com)

-and-

Timothy C. Mohan (admitted *pro hac vice*)

**FOLEY & LARDNER LLP**

1144 15th Street, Suite 2200

Denver, CO 80202

Telephone: (720) 437-2000

Facsimile: (720) 437-2200

[tmohan@foley.com](mailto:tmohan@foley.com)

-and-

Nora J. McGuffey (TX 24121000)

Quynh-Nhu Truong (TX 24137253)

**FOLEY & LARDNER LLP**

1000 Louisiana Street, Suite 2000

Houston, TX 77002

Telephone: (713) 276-5500

Facsimile: (713) 276-5555

[nora.mcguffey@foley.com](mailto:nora.mcguffey@foley.com)

[qtruong@foley.com](mailto:qtruong@foley.com)

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

**CERTIFICATE OF SERVICE**

I hereby certify that on July 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