

**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)

**JOINT STIPULATION AND AGREED ORDER GRANTING RAMANDEEP GIRN
AND REBECCA GIRN AN EXTENSION TO FILE PROOFS OF CLAIM**

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 Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Naperville LLC (8046); 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.



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This stipulation (the “**Stipulation**”) is entered into by and among Higher Ground Education, Inc. and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) and Ramandeep Girn and Rebecca Girn (collectively, the “**Girns**”), as of the date set forth below granting the Girns an extension of the deadline by which to file proofs of claim, according to the terms and conditions set forth below:

RECITALS

WHEREAS, on June 17, 2025, and June 18, 2025 (collectively, the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11. The Debtors remain in possession of their property and are managing their businesses as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. The court has not appointed a trustee, and no official committee has been established.

WHEREAS, on June 20, 2025, the Court entered the *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* (the “**Bar Date Order**”) establishing, among other things, August 7, 2025 as the deadline to file proofs of claim against any of the Debtors (excluding claims held by governmental units (as defined in section 101(27) of the Bankruptcy Code)) (the “**General Bar Date**”). ECF No. 57; and

WHEREAS, the Girns have entered into an agreement with the Debtors by which the Debtors agreed to an extension of the General Bar Date as it pertains to the Girns; and

WHEREAS, the Debtors agree that the Girns will have until on or before August 21, 2025, to file proofs of claim on their behalf.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND AMONG THE PARTIES, THROUGH THEIR UNDERSIGNED COUNSEL, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED THAT:

1. Each of the Recitals as set forth above is incorporated herein by reference.
2. Notwithstanding anything to the contrary set forth in the Bar Date Order, the Bar Date Notice, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Northern District of Texas, and/or the Procedures for Complex Cases in the Northern District of Texas that would otherwise require the Girns to file proofs of claim on the original bar date, it is expressly agreed herein that the filing of a proof of claim or proofs of claim by the Girns as contemplated herein shall be deemed timely filed when filed on or by August 21, 2025.
3. Nothing herein shall prejudice any Debtors' or any other party's rights to object to any proof of claim filed by the Girns on any basis, and any such rights, along with the Girns' defenses to such objections, are hereby preserved.
4. This Stipulation is intended solely for the purpose of administrative convenience and, except to the extent expressly set forth herein, shall not be deemed to constitute an agreement or admission as to the validity of any claims and shall not affect the substantive rights of the Debtors, the Girns, or any other party in interest, including with respect to the extent, validity, perfection, enforceability, allowance, amount, or priority of the Girns' claims or with respect to any objection, defense, offset, or counterclaim related to the Girns' claims or any party's rights to contest, object to, or seek to disallow, and/or expunge any proofs of claims filed by the Girns on any grounds not inconsistent with this Stipulation.

5. Unless the Parties expressly agree otherwise, this Stipulation and the above-noted procedure shall also apply to any amendments that the Girns may make with respect to any proof of claim against any of the Debtors. The Debtors hereby reserve all rights with respect to such amendments, including but not limited to their right to object to such amendments on any grounds not inconsistent with this Stipulation.

END OF ORDER

STIPULATED AND AGREED:

/s/ Timothy C. Mohan

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