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

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

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

**CERTIFICATE OF CONFERENCE REGARDING DEBTORS' EMERGENCY
MOTION TO SHORTEN NOTICE OF AND SET EXPEDITED HEARING ON
DEBTORS' THIRD OMNIBUS MOTION FOR ENTRY OF AN ORDER (I)
AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN
UNEXPIRED LEASES, AND (II) GRANTING RELATED RELIEF**

In accordance with Local Bankruptcy Rule 9007-1(f), proposed counsel for Higher Ground Education, Inc. and its affiliated debtors and debtors in possession (each a “**Debtor**” and collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**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.

conferred with counsel for the Official Committee of Unsecured Creditors (the “**Committee**”), counsel to the DIP Lenders, and the United States Trustee (the “**UST**”) regarding the *Debtors’ Emergency Motion to Shorten Notice of and Set Expedited Hearing on Debtors’ Third Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Unexpired Leases, and (II) Granting Related Relief* (the “**Emergency Motion**”).

The undersigned hereby certifies that on August 7, 2025, Holland O’ Neil, proposed counsel to the Debtors conferred with Aaron Kaufman, counsel for the Committee, Trevor Hoffmann and Jason Binford, counsels for the DIP Lenders, and Meredyth Kippes with the UST regarding the emergency nature of the relief requested in the Emergency Motion. Counsel for the Committee opposes the emergency nature of the relief requested in the Emergency Motion. Counsels for the DIP Lenders and the UST do not oppose the relief requested in the Emergency Motion.

DATED: August 8, 2025

Respectfully submitted by:

/s/ Holland N. O’Neil

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CERTIFICATE OF SERVICE

I hereby certify that on August 8, 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