

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  
tscannell@foley.com

Timothy C. Mohan  
(admitted *pro hac vice*)  
**FOLEY & LARDNER LLP**  
1400 16<sup>th</sup> Street, Suite 200  
Denver, CO 80202  
Telephone: (720) 437-2000  
Facsimile: (720) 437-2200  
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  
qtruong@foley.com

**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
	§	
Debtor.	§	(Jointly Administered)

**CERTIFICATE OF NO OBJECTION REGARDING  
DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) APPROVING  
A SETTLEMENT AGREEMENT WITH PLAINTIFFS IN CERTAIN  
LITIGATION PURSUANT TO FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 9019 AND (II) GRANTING RELATED RELIEF**

[Related to Docket No. 262]

The undersigned counsel for 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**”), certifies as follows:

<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 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.



1. On July 24, 2025, the Debtors filed the *Debtors' Motion for Entry of an Order (I) Approving a Settlement Agreement with Plaintiffs in Certain Litigation Pursuant to Federal Rule of Bankruptcy Procedure 9019 and (II) Granting Related Relief* [Docket No. 262] (the “**Motion**”).<sup>2</sup>

2. The deadline for parties to file responses or objections to the relief requested in the Motion was August 18, 2025 (the “**Objection Deadline**”).

3. The Motion was served electronically via the Court’s PACER/ECF system as set forth on the Motion, and served via first-class mail on July 24, 2025, as set forth in the *Certificate of Service* [Docket No. 283] filed on the docket in the Chapter 11 Cases.

4. No objections to the Motion were filed on the docket in these Chapter 11 Cases, nor were any other responses, formal or informal, received by the Debtors or their undersigned counsel.

5. Accordingly, the Debtors respectfully request that the Court grant the Motion and enter the proposed order attached hereto as **Exhibit A**, at its earliest convenience and without the need for a hearing.

*[Remainder of page intentionally left blank.]*

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

DATED: August 19, 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)

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1144 15th Street, Suite 2200

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

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

**COUNSEL TO DEBTORS  
AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 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**

**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> , <sup>1</sup>	§	
	§	Case No.: 25-80121-11 (MVL)
Debtor.	§	
	§	(Jointly Administered)

**ORDER (I) APPROVING A SETTLEMENT AGREEMENT WITH  
PLAINTIFFS IN CERTAIN LITIGATION PURSUANT TO FEDERAL RULE OF  
BANKRUPTCY PROCEDURE 9019 AND (II) GRANTING RELATED RELIEF**

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<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.

Upon the motion (the “**Motion**”)<sup>2</sup> of Higher Ground Education, Inc. and its affiliated debtors, as 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**”) pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedures (the “**Bankruptcy Rules**”), (a) approving the Settlement, and (b) granting related relief, including the lifting of the automatic stay for the limited purpose of obtaining approval of the proposed settlement, all as is more fully described in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein under 28 U.S.C. §§ 157 and 1334; and this Court having determined that this is a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having determined that venue of this proceeding in this District is proper under 28 U.S.C. §§ 1408 and 1409; and this Court having determined that the Debtors’ notice of the Motion and opportunity for a hearing were adequate and appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and the McCarthy Declaration; and this Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and this Court having determined that the relief sought in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; 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. The Settlement is hereby approved in all respects in accordance with Bankruptcy Rule 9019 and Bankruptcy Code section 105(a), including the releases contained therein.

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<sup>2</sup> Capitalized terms used but not otherwise defined here shall have the meanings scribed to such terms in the Motion.

3. The automatic stay imposed by section 362 of the Bankruptcy Code be lifted and/or modified so that the parties to the Action can file a consent petition to settle the claims thereto.

4. The Settlement shall be effective upon approval in the trial court (such date, the “**Effective Date**”).

5. Once approval is obtained from the trial court of the Action, all required settlement documents are executed and returned, and all required tax identification documents are provided, Insurance Provider will fund the settlement in the amount of \$100,000.00.

6. Upon receipt of the Settlement Payment and approval of the trial court, the parties to the Action shall file a stipulated notice of dismissal with prejudice of Plaintiffs’ claims against the defendants in the Action on the appropriate dockets.

7. The parties are authorized to enter into, perform, execute, and deliver all documents, and take all actions, necessary to immediately continue and fully implement the Settlement in accordance with the terms, conditions, agreements, and releases set forth or provided for therein, all of which are approved.

8. The Debtors’ entry into the Settlement is an exercise of the Debtors’ reasonable business judgment.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of (a) such Motion; (b) the terms and conditions of the Settlement; and (c) the hearing to approve the Settlement Agreement, and that the requirements of Bankruptcy Rules 2002 and 6004(a), and the Local Rules, are satisfied by such notice.

10. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

11. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**### END OF ORDER ###**

Submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700)  
**FOLEY & LARDNER LLP**  
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Dallas, TX 75201  
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