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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

Higher Ground Education, Inc. *et al.*,

Debtors.

Chapter 11

Case No. 25-80121 (MVL)

(Jointly Administered)

**GUIDEPOST FINANCIAL PARTNER, LLC'S STATEMENT OF POSITION
REGARDING (I) DISTRIBUTION MOTION AND (II) LEASES MOTION**

Guidepost Financial Partner, LLC (as the Debtors refer to it, "**LFI**"), a party in interest and the largest unsecured creditor in these cases, states:

1. LFI has considered the Debtors' *Motion for Entry of an Order (A) Authorizing the Distribution of Cash Receipts to Guidepost Global Education, Inc. and (B) Granting Related Relief* [Doc 304] (the "**Distribution Motion**") and the Debtors' *Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Unexpired Leases, and (II) Granting Related Relief* [Doc 99] (the "**Leases Motion**"), the latter of which seeks the Court's approval of the Debtors' assumption and assignment to Cosmic Education Americas Limited ("**CEA**") of two leases under which affiliates of LFI are landlords.



2. Regarding the Distribution Motion, LFI supports the relief sought in the *Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights* [Doc 344].

3. Regarding the Leases Motion, LFI does not intend to object to the relief sought. Notwithstanding the forgoing, LFI reserves all rights and remedies and does not waive any potential claims or causes of action relating in any way to: (a) the formation, capitalization, or operations of CEA or Guidepost Global Education, Inc. ("GGE"); (b) the transfer of any assets to CEA or GGE; (c) the prepetition foreclosures of purportedly secured debt obligations of the Debtors; (d) any prepetition sale or other transfer of any assets of the Debtors; (e) the assignment or other transfer of leases from the Debtors to other entities, including without limitation the EB-5 entities; or (f) the actions or inactions of any of the Debtors' prepetition officers, directors, employees, agents, contractors, or other individuals purporting to act for any Debtor at any time.

4. LFI does not intend by its reservation of rights in paragraph 3 above to affect in any way the Debtors' estates' (either through the Debtors, the Committee, a post-confirmation trust, or other fiduciary body for the Debtors' creditors) rights and ability to assert any claim or cause of action against any entity or individual on any legal or equitable basis.

August 26, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Michael D. Warner

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CERTIFICATE OF SERVICE

I certify that on August 26, 2025, a copy of the foregoing motion was caused to be served by this court's CM/ECF to all parties registered to receive such notice in the above cases.

/s/ Michael D. Warner

Michael D. Warner