

**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> ,	§	Case No. 25-80121 (MVL)
	§	
Debtors. ¹	§	(Jointly Administered)
	§	

STIPULATION AND AGREED ORDER EXTENDING CHALLENGE PERIOD

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors (the “Committee”) appointed in the Debtors’ chapter 11 cases, the DIP Lenders,² and the Prepetition Secured Lenders (together with the Debtors, Committee, and DIP Lenders, the “Parties”) hereby stipulate and agree as follows:

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/higherground>. The Debtors’ service address for these chapter 11 cases is 1321 Upland Dr., PMB 20442, Houston, TX 77043.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the *Debtors’ Emergency Motion for Entry of Interim and Final Order (I) Authorizing Debtor 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 Certain Related Relief* [Docket No. 14] (the “I



A. WHEREAS, on June 17, 2025 and June 18, 2025, each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

B. WHEREAS, on July 8, 2025, the United States Trustee for the Northern District of Texas appointed the Committee. *See* Docket No. 158.

C. WHEREAS, on July 22, 2025, the Court entered the *Final Order Authorizing Debtor 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 Certain Related Relief* [Docket No. 253] (the “Final DIP Order”).

D. WHEREAS the Final DIP Order provides that the Debtors’ stipulations, admissions, agreements, and releases contained in the Final DIP Order shall be binding on their estates and all other parties in interest, unless, among other things, a party in interest with standing “has timely filed an adversary proceeding or contested matter...within the earlier of: (i) 80 days from the date of entry of the Interim DIP Order, (ii) 60 days from the appointment of the Committee, or (iii) such earlier date upon which the Court enters an order confirming the Plan” (the “Challenge Period”). Final DIP Order ¶ 21(ii).

E. WHEREAS the Parties have been negotiating the terms of a potential plan settlement and in aid thereof the DIP Lenders and Prepetition Secured Lenders have agreed to extend the Challenge Period for thirty days.

NOW, THEREFORE, IT IS HEREBY ORDERED, STIPULATED, AND AGREED AS FOLLOWS:

1. The Challenge Period is extended through and including October 8, 2025.
2. The Challenge Period may be further extended by agreement in writing.

3. Other than as specifically set forth herein, all other terms of the Final DIP Order remain in full force and effect.

4. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation and Agreed Order.

END OF ORDER

Agreed as to form and content:

GRAY REED

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Certificate of Service

I certify that on September 4, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner