

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

In re: HIGHER GROUND EDUCATION, INC., <i>et al.</i> , Debtors. ¹	§ § § § § § § § §	Chapter 11 Case No. 25-80121 (MVL) (Jointly Administered)
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**STIPULATION AND AGREED ORDER GRANTING THE
COMMITTEE DERIVATIVE STANDING TO SEND SETTLEMENT DEMAND**

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

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.

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.



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C. WHEREAS, the Committee conducted an investigation of estate claims and causes of action and believes there are meritorious claims against certain current and former directors and officers of the Debtors.

D. WHEREAS, the Debtors have agreed that the Committee may send a demand to the Debtors' directors and officers related to such claims.

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

1. The Committee is granted derivative standing on behalf of the Debtors' estates to send one or more demand letters with respect to director and officer liability claims.

2. This Court shall retain jurisdiction with respect to all matters arising from and related to the implementation 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 12, 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