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**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 COUNSEL REGARDING  
DEBTORS' OMNIBUS MOTION FOR ENTRY OF AN ORDER  
(I) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF  
CERTAIN UNEXPIRED LEASES, AND (II) GRANTING RELATED RELIEF**

Pursuant to the *Procedures for Complex Cases in the Northern District of Texas*, the undersigned 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**”), 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); AltShool II LLC (0403). The Debtors' mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.



1. On June 17, 2025 and June 18, 2025 (collectively, the “**Petition Date**”), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors remain in possession of their property and continue to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. These Chapter 11 Cases have been jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and the *Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 41]. No request has been made for the appointment of a trustee or examiner. The Office of the United States Trustee for the Northern District of Texas appointed an official committee of unsecured creditors on July 8, 2025 [Docket No. 158].

2. On June 27, 2025, the Debtors filed the *Debtors’ Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Unexpired Leases, and (II) Granting Related Relief* [Docket No. 99] (the “**Motion**”).

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 June 27, 2025, as set forth in the Certificate of Service [Docket No. 110] filed on the docket in the Chapter 11 Cases.

4. The original deadline for parties to file responses or objections to the relief requested in the Motion was July 21, 2025, eventually reset to September 18, 2025 (the “**Objection Deadline**”).

5. On August 26, 2025, Guidepost Financial Partner, LLC (“**GFA**”) filed *Guidepost Financial Partner, LLC’s Statement of Position Regarding (I) Distribution Motion and (II) Leases Motion* [Docket No. 396] (the “**GFA Statement**”).

6. On August 28, 2025, the Official Committee of Unsecured Creditors (the “**Committee**”) filed a *Limited Objection and Reservation of Rights* to the Motion [Docket No. 400] (the “**Committee Objection**”).

7. Prior to the Objection Deadline, counsel for TNC Schools, LLC (“**TNC**”), Quattro San Rafael LLC (“**Quattro**”), and Twin Star Ventures, LLC (“**Twin Star**”) provided informal comments to Debtors’ counsel regarding the original proposed form of order filed with the Motion (the “**Original Proposed Order**”).

8. Debtors’ counsel has conferred with counsel for GFA, the Committee, TNC, Quattro, and Twin Star and has revised the Original Proposed Order to reflect the resolutions reached with those parties (the “**Revised Proposed Order**”). Counsel for GFA, the Committee TNC, Quattro, and Twin Star do not oppose the Revised Proposed Order.

9. The Revised Proposed Order is attached hereto as **Exhibit A**. A redline of the Revised Proposed Order against the Original Proposed Order is attached hereto as **Exhibit B**.

10. No additional objections to the Motion were filed on the Court’s docket nor were any other responses, formal or informal, received by the Debtors or counsel to the Debtors. Accordingly, the undersigned counsel certifies that all known objections to the Motion have been resolved by the attached Revised Proposed Order.

*[Remainder of Page Intentionally Left Blank]*

DATED: September 25, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

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**COUNSEL TO DEBTORS  
AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I certify that on September 25, 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/ Nora J. McGuffey

Nora J. McGuffey

## **Exhibit A**

**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)

**ORDER GRANTING DEBTORS' OMNIBUS MOTION FOR ENTRY OF AN  
ORDER (I) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF  
CERTAIN UNEXPIRED LEASES, 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 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.

Upon consideration of the motion (the “**Motion**”)<sup>2</sup> of 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**”) for entry of an order authorizing, but not directing, the debtors to assume and assign certain executory unexpired leases listed on **Schedule 1**, attached hereto (collectively, the “**Assigned Leases**”) and granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “**Hearing**”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; 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 unexpired leases (as amended, supplemented, or otherwise modified, the “**Assigned Leases**”) listed on **Schedule 1**, attached hereto (the “**Assumption List**”), are

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



assumed and assigned to the applicable assignee designated on the Assumption List, pursuant to sections 105(a) and 365 of the Bankruptcy Code, in each case effective as of the Petition Date.

3. The Proposed Cure Amounts as set forth in the Assumption List are approved and shall be paid by the applicable Assignee within five (5) days after entry of this Order. Any defaults or other obligations of the Debtors under the Assigned Contracts and Leases arising prior to the date of entry of this Order are deemed satisfied by the payment of the Proposed Cure Amounts. For the avoidance of doubt, the Debtors shall have no liability for such Proposed Cure Amounts, and the Contract Counterparties shall have no recourse to the Debtors for satisfaction of such Proposed Cure Amounts.

4. For the avoidance of doubt, GGE assumes all obligations related to the Hampshire School lease with Cameron Management LLC, including, but not limited to, the payment of rental obligations, the payment of obligations under the Loan Agreement and Promissory Note, effective as of September 6, 2024, between Guidepost A LLC and Twin Star Ventures, LLC, and contractually agreed-upon tax obligations.

5. Nothing contained in the Motion or this Order, nor any action taken pursuant thereto, nor any payment made pursuant to the authority granted thereby, is intended to be or shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against a Debtor entity or any other party in interest under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any party in interest's rights to dispute any claim on any grounds; (c) a promise or requirement to pay any claim except as otherwise expressly provided herein; (d) an implication or admission that any claim is of a type specified or defined in this Motion or any order granting the relief requested by this Motion; (e) a waiver of any claims or causes of action that may exist against any creditor or interest holder; (f) except as otherwise

expressly provided herein, a bar or disallowance of any creditors' claim against the Debtors; (g) a limitation of any creditors' right to assert a claim against the Foreclosure Buyers for performance under its respective contract; (h) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code, except for the assumption and assignment of the Assigned Contracts identified on the Assumption List; (i) a waiver or limitation of the Debtors' and Foreclosure Buyers' rights under the Bankruptcy Code or any other applicable law; or (j) a waiver of any claims that the Debtors or any party in interest may have against any Contract Counterparty, whether or not such claims arise under, are related to the assumption of, or are independent of the Assigned Leases.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the Bankruptcy Local Rules are satisfied by such notice.

7. The contents of the Motion satisfy the requirements of Bankruptcy Rule 6006.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

9. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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

Submitted by:

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**COUNSEL TO DEBTORS  
AND DEBTORS IN POSSESSION**

**SCHEDULE 1**

Ok. No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
1.	Alicia	Guidepost A LLC	Shatrujeet Inc	5/26/2022	25261 Paseo De Alicia, Laguna Hills, CA, 92653	GGE	\$0
2.	Arbor Spring	Guidepost A LLC	NVS PROPERTIES XI LLC	3/19/2022	430 Arbor Spring Drive, Ballwin, IL, 63021	GGE	\$0
3.	Baymeadows	HGE FIC I LLC	FORTIS B LLC	7/8/2020	8401 Baymeadows Way, Jacksonville, FL, 32256	CEA	\$0
4.	Blue Ash	Guidepost A LLC	NVS PROPERTIES 23, LLC	11/15/2022	11179 Luschek Drive, Blue Ash, OH, 45241	GGE	\$0
5.	Bridgewater	HGE FIC L LLC	NVS PROPERTIES V LLC	3/29/2021	1246 US-206, Bridgewater Township, NJ, 08807	CEA	\$0
6.	Burr Ridge	Guidepost A LLC	G2MKLN, LLC	1/29/2021	7508 S. Countyline Road, Burr Ridge, IL, 60527	Burr Ridge LLC	\$0
7.	Cary	Guidepost A LLC	HGIT 302 Colonades Way LLC	6/14/2022	316 Colonades Way, Suites C-103 & C-107, Cary, NC, 27518	GGE	\$0
8.	Celebration Park	HGE FIC M LLC	Federal Way School LLC	3/28/2022	1122 S. 322nd Place, Federal Way, WA, 98003	CEA	\$0
9.	Central West End	Guidepost A LLC	4150 Laclede LLC	2/26/2020	4150 Laclede Avenue, St. Louis, MO, 63108	GGE	\$0
10.	Chantilly	Guidepost A LLC	DAYCARE PROPERTIES, LLC	11/17/2015	4550 Walney Road, Chantilly, VA, 20151	GGE	\$0
11.	Cypress Creek	Guidepost A LLC	Crest Properties LLC	8/30/2018	2006 Sun Chase Boulevard, Cedar Park, TX, 78613	GGE	\$0
12.	Deerbrook	HGE FIC I LLC	Deerfield 1085 LLC	1/13/2023	1085 Lake Cook Road, Deerfield, IL, 60015	CEA	\$0

Ok. No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
13.	Deerfield	Guidepost A LLC	R&P Alpharetta GA LLC	12/4/2018	3105 Webb Road, Alpharetta, GA, 30004	GGE	\$0
14.	Downers Grove	HGE FIC M LLC	Downers 925 LLC	12/11/2020	925 W. Ogden Avenue, Downers Grove, IL, 60515	CEA	\$0
15.	Emeryville	Guidepost A LLC	Guidepost Emeryville LLC	3/23/2015	1450-1452 63rd Street, Emeryville, CA, 94608	CEA	\$0
16.	Evanston	HGE FIC I LLC	La Cresenta Apartments	8/29/2019	1012-1014 Davis Street, Evanston, IL, 60201	CEA	\$0
17.	Fairfax	Guidepost A LLC	Fairfax Virginia Post 777, American Legion Inc	12/18/1997	3909 Oak Street, Fairfax, VA, 22030	GGE	\$0
18.	Flower Mound	HGE FIC D LLC	JD Properties Vancouver, LLC and J.K. Lamb, LLC	11/19/2020	2501 Simmons Road, Flower Mound, TX, 75022	CEA	\$0
19.	Folsom	Guidepost A LLC	777 Levy Road, LLC	4/15/2019	777 Levy Road, Folsom, CA, 95630	GGE	\$0
20.	Folsom	Guidepost A LLC	Levy Road JLFT LLC	4/15/2019	791 Levy Road, Folsom, CA, 95630	GGE	\$0
21.	Foothill Ranch	HGE FIC B LLC	Jaber J. Khuri Irrevocable Trust, Paul J. Khuri Irrevocable Trust, Tony J. Khuri Irrevocable Trust	10/14/2016	26462 Towne Centre Drive, Foothill Ranch, CA, 92610	CEA	\$0
22.	Galleria	Guidepost A LLC	FW TX-Woodway Collection, L.P	1/4/2021	1371 South Voss Road, Houston, TX, 77057	GGE	\$0
23.	Gambrills	Guidepost A LLC	Allan, Finney & Lyle, LLC	7/1/2013	1305 Riedel Road, Gambrills, MD, 21054	GGE	\$0
24.	Goodyear	Guidepost Goodyear LLC	1832 Litchfield LLC	3/1/2023	1832 N. Litchfield Road, Goodyear, AZ, 85395	CEA	\$0
25.	Hampshire	Guidepost A LLC	Cameron Management LLC	3/23/2020	6008 Hampshire Circle, Waldorf, MD, 20603	GGE	\$0

Ok. No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
26.	Hillsboro	Guidepost A LLC	1282 3rd ST. LLC	4/15/2022	2802 SE 70th Avenue, Hillsboro, OR, 97123	GGE	\$0
27.	Hollywood Beach	HGE FIC E LLC	2230 - 2402 Hollywood LLC	4/30/2018	2230 & 2402 Hollywood Blvd., Hollywood, FL, 33020	CEA	\$0
28.	Hurst	Guidepost A LLC	Cove Texas Net Lease 67 MT, LLC	12/17/2021	110 Grapevine Hwy, Hurst, TX, 75025	GGE	\$0
29.	Katy	Guidepost A LLC	Harvest Guidepost Katy LLC	9/11/2019	21418 Kingsland Boulevard, Katy, TX, 77450	GGE	\$0
30.	Laurel Oak	HGE FIC G LLC	Falcone Company LP	9/25/2018	1004 Laurel Oak Road, Voorhees Township, NJ, 08043	CEA	\$0
31.	Lawrenceville	Guidepost A LLC	PALIBA REALTY TRUST	3/6/1998	222 Federal City Road, Lawrenceville, NJ, 08648	GGE	\$0
32.	Lincoln Park	Guidepost A LLC	RV 2301 N Clark St LLC	8/30/2019	2301 North Clark Street, Chicago, IL, 60614	GGE	\$0
33.	Lynnwood	Guidepost A LLC	RIVERSIDE PALM COURT LLC	1/25/2022	5421 196th Street SW, Lynnwood, WA, 98036	CEA	\$0
34.	Magnificent Mile	HGE FIC D LLC	OPTIMA CENTER CHICAGO II, LLC	3/8/2018	226 East Illinois Street, Chicago, IL, 60611	CEA	\$0
35.	Mahwah	HGE FIC G LLC	Harveston-SAB South LLC	1/8/2021	25 Edison Road, Mahwah, NJ, 07430	CEA	\$0
36.	Mansfield	Guidepost A LLC	Cove Texas Net Lease 67 MT, LLC	2/17/2022	2271 Matlock Road, Mansfield, TX, 76063	GGE	\$0
37.	Marietta	Guidepost A LLC	Hanoy Georgia, LLC	1/21/2021	2358 Shallowford Road, Marietta, GA, Marietta, GA, 30066	GGE	\$0
38.	Mill Valley	Guidepost A LLC	Gregcoh LLC	8/9/2023	270 Miller Avenue, Mill Valley, CA,	GGE	\$0

Ok. No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
					95630		
39.	Montclair	Guidepost A LLC	B&P Realty and Management LLC and Lenlo Realty LLC	7/10/2020	3551 Waterway Drive, Montclair, VA, 22025	GGE	\$0
40.	North Scottsdale	Guidepost A LLC	3501 W. Segerstrom LLC	7/8/2020	20624 N 76th St, Scottsdale, AZ, 85255	GGE	\$0
41.	North Wales	Guidepost A LLC	Upper Gwynedd Equities LLC	8/13/2021	467 Sumneytown Pike, Suite 200, Upper Gwynedd, PA, 19454	CEA	\$0
42.	Old Town	HGE FIC L LLC	Onni Atrium Development LP	1/16/2020	311 W. Division Street, Chicago, IL, 60610	CEA	\$0
43.	Palm Beach Gardens	HGE FIC I LLC	FORTIS A LLC	6/22/2020	353 Hiatt Drive, Palm Beach Gardens, FL, 33418	CEA	\$0
44.	Paradise Valley	HGE FIC L LLC	DV 20 AC LIMITED LIABILITY PARTNERSHIP	6/21/2021	4856 E Greenway Road, Scottsdale, AZ, 85254	CEA	\$0
45.	Peoria	HGE FIC E LLC	SS Peoria Arizona, LLC	2/26/2018	20565 Fletcher Way, Peoria, AZ, 85382	CEA	\$0
46.	Plum Canyon	HGE FIC F LLC	Intertex Plum Canyon, LLC	5/1/2018	19141 Skyline Ranch Road, Santa Clarita, CA, 91350	CEA	\$0
47.	Reston	Guidepost A LLC	DAYCARE PROPERTIES, LLC	11/17/2015	11579 Cedar Chase Road, Reston, VA, 20170	GGE	\$0
48.	Richardson	Guidepost Richardson LLC	1140 W Campbell Road LLC	3/21/2023	1140 W. Campbell Road, Richardson, TX, 75080	CEA	\$0
49.	Somerset	Guidepost A LLC	Jans Realty LLC	9/15/2020	121 Pierce Drive, Somerset, NJ, 08873	GGE	\$0



Ok. No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
50.	South Beaverton	Guidepost A LLC	Beaverton 12650 LLC	4/1/2021	12650 SW Brockman, Beaverton, OR, 97008	GGE	\$0
51.	South Naperville	HGE FIC F LLC	The Janet Fargo Exemption Trust and Labonnevie Ventures, LLC	12/11/2018	5051 Ace Lane, Naperville, IL, 60564	CEA	\$0
52.	South Riding	GUIDEPOST SOUTH RIDING	Hanoy Virginia	10/15/2020	43181 Amberwood Plaza, Chantilly, VA, 20152	CEA	\$0
53.	The Woodlands	GUIDEPOST THE WOODLANDS LLC	CQFT, LLC	7/26/2022	2280 Buckthorne Place, Spring, TX, 77380	CEA	\$0
54.	Timber Ridge	HGE FIC B LLC	CASA Timber Ridge, LLC	4/25/2017	2550 Timber Ridge Dr., Frisco, TX, 75034	CEA	\$0
55.	West Alex	Guidepost A LLC	WRI Gateway Alexandria, LLC	6/12/2019	3475 N. Beauregard Street, Suite 301, Alexandria, VA, 22302	GGE	\$0
56.	Wicker Park	HGE FIC B LLC	555 Bryant Partners, LLC	4/20/2017	1530 North Damen Avenue, Chicago, IL, 60622	CEA	\$0
57.	Williamsburg	HGE FIC C LLC	QUEEN GARDENS REALTY LLC	1/2/2018	717 Driggs Avenue, Brooklyn, NY, 11211	CEA	\$0
58.	Worthington	HGE FIC I LLC	AUDRA ROBBINS, AS SOLE TRUSTEE OF THE ROBBINS TRUST DATED 8/31/2018	8/17/2021	125 Dillmont Dr., Columbus, OH, 43236	CEA	\$0

## **Exhibit B**

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

<hr style="border: 0.5px solid black;"/> <p>In re:</p> <p>Higher Ground Education, Inc., <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtor.</p> <hr style="border: 0.5px solid black;"/>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No.: <del>25-#####-11</del><a href="#">25-80121-11</a></p> <p><del>(Joint Administration Requested)</del><a href="#">Jointly Administered</a></p>
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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 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.

**ORDER GRANTING DEBTORS' OMNIBUS MOTION FOR ENTRY OF AN  
ORDER (I) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT OF  
CERTAIN UNEXPIRED LEASES, AND (II) GRANTING RELATED RELIEF**

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Upon consideration of the motion (the “**Motion**”)<sup>2</sup> of 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**”) for entry of an order authorizing, but not directing, the debtors to assume and assign certain executory unexpired leases listed on **Schedule 1**, attached hereto (collectively, the “**Assigned Leases**”) and granting related relief, all as more fully set forth in the Motion; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the “**Hearing**”); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient

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

cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The unexpired leases (as amended, supplemented, or otherwise modified, the “Assigned Leases”) listed on Schedule 1, attached hereto (the “Assumption List”), are assumed and assigned to the applicable assignee designated on the Assumption List, pursuant to sections 105(a) and 365 of the Bankruptcy Code, in each case effective as of the Petition Date.
3. The Proposed Cure Amounts ~~are~~as set forth in the Assumption List are approved and shall be paid by the applicable Assignee within five (5) days after entry of this Order. Any defaults or other obligations of the Debtors under the Assigned Contracts and Leases arising prior to the date of entry of this Order are deemed satisfied by the payment of the Proposed Cure Amounts. For the avoidance of doubt, the Debtors shall have no liability for such Proposed Cure Amounts, and the Contract Counterparties shall have no recourse to the Debtors for satisfaction of such Proposed Cure Amounts.
4. For the avoidance of doubt, GGE assumes all obligations related to the Hampshire School lease with Cameron Management LLC, including, but not limited to, the payment of rental obligations, the payment of obligations under the Loan Agreement and Promissory Note, effective as of September 6, 2024, between Guidepost A LLC and Twin Star Ventures, LLC, and contractually agreed-upon tax obligations.
5. ~~4.~~ Nothing contained in the Motion or this Order, nor any action taken pursuant thereto, nor any payment made pursuant to the authority granted thereby, is intended to be or shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against a Debtor entity or any other party in interest under the Bankruptcy Code or other applicable non- bankruptcy law; (b) a waiver of the Debtors’ or any party in interest’s rights to

dispute any claim on any grounds; (c) a promise or requirement to pay any claim except as otherwise expressly provided herein; (d) an implication or admission that any claim is of a type specified or defined in this Motion or any order granting the relief requested by this Motion; (e) a waiver of any claims or causes of action that may exist against any creditor or interest holder; (f) except as otherwise expressly provided herein, a bar or disallowance of any creditors' claim against the Debtors; (g) a limitation of any creditors' right to assert a claim against the Foreclosure Buyers for performance under its respective contract; (h) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code, except for the assumption and assignment of the Assigned Contracts identified on the Assumption List; (i) a waiver or limitation of the Debtors' and Foreclosure Buyers' rights under the Bankruptcy Code or any other applicable law; or (j) a waiver of any claims that the Debtors or any party in interest may have against any Contract Counterparty, whether or not such claims arise under, are related to the assumption of, or are independent of the Assigned Leases.

6. ~~5.~~ Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the Bankruptcy Local Rules are satisfied by such notice.

7. ~~6.~~ The contents of the Motion satisfy the requirements of Bankruptcy Rule 6006.

8. ~~7.~~ The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

9. ~~8.~~ This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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

Submitted by:

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

**SCHEDULE 1**



<b>Summary report:</b> <b>Litera Compare for Word 11.7.0.54 Document comparison done on</b> <b>9/25/2025 9:56:54 AM</b>	
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<u>Ok.</u> No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
1.	Alicia	Guidepost A LLC	Shatrujeet Inc	5/26/2022	25261 Paseo De Alicia, Laguna Hills, CA, 92653	GGE	\$0
2.	Arbor Spring	Guidepost A LLC	NVS PROPERTIES XI LLC	3/19/2022	430 Arbor Spring Drive, Ballwin, IL, 63021	GGE	\$0
3.	Baymeadows	HGE FIC I LLC	FORTIS B LLC	7/8/2020	8401 Baymeadows Way, Jacksonville, FL, 32256	CEA	\$0
<del>4.</del>	<del>Bee Cave</del>	<del>Guidepost A-LLC</del>	<del>Teardrop Partners L.P.</del>	<del>11/11/2013</del>	<del>14058 Bee Cave Parkway, Bee Cave, TX, 78738</del>	<del>TNC</del>	<del>\$0</del>
<u>4.</u>	Blue Ash	Guidepost A LLC	NVS PROPERTIES 23, LLC	11/15/2022	11179 Lusheck Drive, Blue Ash, OH, 45241	GGE	\$0
<u>5.</u>	Bridgewater	HGE FIC L LLC	NVS PROPERTIES V LLC	3/29/2021	1246 US-206, Bridgewater Township, NJ, 08807	CEA	\$0
<del>7.</del>	<del>Brushy Creek</del>	<del>Guidepost A-LLC</del>	<del>Richard Freeman Trust and Micah Freeman Trust</del>	<del>8/30/2018</del>	<del>3017 Polar Lane, Cedar Park, TX, 78613</del>	<del>TNC</del>	<del>\$0</del>
<u>6.</u>	Burr Ridge	Guidepost A LLC	G2MKLN, LLC	1/29/2021	7508 S. Countyline Road, Burr Ridge, IL, 60527	<del>TNC</del> Burr Ridge LLC	\$0
<u>7.</u>	Cary	Guidepost A LLC	HGIT 302 Colonades Way LLC	6/14/2022	316 Colonades Way, Suites C-103 & C-107, Cary, NC, 27518	GGE	\$0
<u>8.</u>	Celebration Park	HGE FIC M LLC	Federal Way School LLC	3/28/2022	1122 S. 322nd Place, Federal Way, WA, 98003	CEA	\$0
<u>9.</u>	Central West End	Guidepost A LLC	4150 Laclede LLC	2/26/2020	4150 Laclede Avenue, St. Louis, MO, 63108	GGE	\$0
<u>10.</u>	Chantilly	Guidepost A LLC	DAYCARE PROPERTIES, LLC	11/17/2015	4550 Walney Road, Chantilly, VA, 20151	GGE	\$0

<u>Ok.</u> No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
<a href="#"><u>11.</u></a>	Cypress Creek	Guidepost A LLC	Crest Properties LLC	8/30/2018	2006 Sun Chase Boulevard, Cedar Park, TX, 78613	GGE	\$0
<a href="#"><u>12.</u></a>	Deerbrook	HGE FIC I LLC	Deerfield 1085 LLC	1/13/2023	1085 Lake Cook Road, Deerfield, IL, 60015	CEA	\$0
<a href="#"><u>13.</u></a>	Deerfield	Guidepost A LLC	R&P Alpharetta GA LLC	12/4/2018	3105 Webb Road, Alpharetta, GA, 30004	GGE	\$0
<a href="#"><u>14.</u></a>	Downers Grove	HGE FIC M LLC	Downers 925 LLC	12/11/2020	925 W. Ogden Avenue, Downers Grove, IL, 60515	CEA	\$0
<del>17.</del>	<del>Eldorado</del>	<del>Guidepost A LLC</del>	<del>Crazy Beagle, LLC</del>	<del>1/24/2017</del>	<del>7508 Eldorado Parkway, McKinney, TX, 75070</del>	<del>TNC</del>	<del>\$0</del>
<a href="#"><u>15.</u></a>	Emeryville	Guidepost A LLC	Guidepost Emeryville LLC	3/23/2015	1450-1452 63rd Street, Emeryville, CA, 94608	CEA	\$0
<a href="#"><u>16.</u></a>	Evanston	HGE FIC I LLC	La Cresenta Apartments	8/29/2019	1012-1014 Davis Street, Evanston, IL, 60201	CEA	\$0
<a href="#"><u>17.</u></a>	Fairfax	Guidepost A LLC	Fairfax Virginia Post 777, American Legion Inc	12/18/1997	3909 Oak Street, Fairfax, VA, 22030	GGE	\$0
<a href="#"><u>18.</u></a>	Flower Mound	HGE FIC D LLC	JD Properties Vancouver, LLC and J.K. Lamb, LLC	11/19/2020	2501 Simmons Road, Flower Mound, TX, 75022	CEA	\$0
<a href="#"><u>19.</u></a>	Folsom	Guidepost A LLC	777 Levy Road, LLC	4/15/2019	777 Levy Road, Folsom, CA, 95630	GGE	\$0
<a href="#"><u>20.</u></a>	Folsom	Guidepost A LLC	Levy Road JLFT LLC	4/15/2019	791 Levy Road, Folsom, CA, 95630	GGE	\$0
<a href="#"><u>21.</u></a>	Foothill Ranch	HGE FIC B LLC	Jaber J. Khuri Irrevocable Trust, Paul J. Khuri Irrevocable	10/14/2016	26462 Towne Centre Drive, Foothill	CEA	\$0

<u><a href="#">Ok.</a></u> No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
			Trust, Tony J. Khuri Irrevocable Trust		Ranch, CA, 92610		
<u><a href="#">22.</a></u>	Galleria	Guidepost A LLC	FW TX-Woodway Collection, L.P	1/4/2021	1371 South Voss Road, Houston, TX, 77057	GGE	\$0
<u><a href="#">23.</a></u>	Gambrills	Guidepost A LLC	Allan, Finney & Lyle, LLC	7/1/2013	1305 Riedel Road, Gambrills, MD, 21054	GGE	\$0
<u><a href="#">24.</a></u>	Goodyear	Guidepost Goodyear LLC	1832 Litchfield LLC	3/1/2023	1832 N. Litchfield Road, Goodyear, AZ, 85395	CEA	\$0
<u><a href="#">25.</a></u>	Hampshire	Guidepost A LLC	Cameron Management LLC	3/23/2020	6008 Hampshire Circle, Waldorf, MD, 20603	GGE	\$0
<u><a href="#">26.</a></u>	Hillsboro	Guidepost A LLC	1282 3rd ST. LLC	4/15/2022	2802 SE 70th Avenue, Hillsboro, OR, 97123	GGE	\$0
<u><a href="#">27.</a></u>	Hollywood Beach	HGE FIC E LLC	2230 - 2402 Hollywood LLC	4/30/2018	2230 & 2402 Hollywood Blvd., Hollywood, FL, 33020	CEA	\$0
<u><a href="#">28.</a></u>	Hurst	Guidepost A LLC	Cove Texas Net Lease 67 MT, LLC	12/17/2021	110 Grapevine Hwy, Hurst, TX, 75025	GGE	\$0
<u><a href="#">29.</a></u>	Katy	Guidepost A LLC	Harvest Guidepost Katy LLC	9/11/2019	21418 Kingsland Boulevard, Katy, TX, 77450	GGE	\$0
<u><a href="#">30.</a></u>	Laurel Oak	HGE FIC G LLC	Falcone Company LP	9/25/2018	1004 Laurel Oak Road, Voorhees Township, NJ, 08043	CEA	\$0
<u><a href="#">31.</a></u>	Lawrenceville	Guidepost A LLC	PALIBA REALTY TRUST	3/6/1998	222 Federal City Road, Lawrenceville, NJ, 08648	GGE	\$0
<u><a href="#">32.</a></u>	Lincoln Park	Guidepost A LLC	RV 2301 N Clark St LLC	8/30/2019	2301 North Clark Street, Chicago, IL, 60614	GGE	\$0

<u>Ok.</u> No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
<a href="#"><u>33.</u></a>	Lynnwood	Guidepost A LLC	RIVERSIDE PALM COURT LLC	1/25/2022	5421 196th Street SW, Lynnwood, WA, 98036	CEA	\$0
<a href="#"><u>34.</u></a>	Magnificent Mile	HGE FIC D LLC	OPTIMA CENTER CHICAGO II, LLC	3/8/2018	226 East Illinois Street, Chicago, IL, 60611	CEA	\$0
<a href="#"><u>35.</u></a>	Mahwah	HGE FIC G LLC	Harveston-SAB South LLC	1/8/2021	25 Edison Road, Mahwah, NJ, 07430	CEA	\$0
<a href="#"><u>36.</u></a>	Mansfield	Guidepost A LLC	Cove Texas Net Lease 67 MT, LLC	2/17/2022	2271 Matlock Road, Mansfield, TX, 76063	GGE	\$0
<a href="#"><u>37.</u></a>	Marietta	Guidepost A LLC	Hanoy Georgia, LLC	1/21/2021	2358 Shallowford Road, Marietta, GA, Marietta, GA, 30066	GGE	\$0
<a href="#"><u>38.</u></a>	Mill Valley	Guidepost A LLC	Gregcoh LLC	8/9/2023	270 Miller Avenue, Mill Valley, CA, 95630	GGE	\$0
<a href="#"><u>39.</u></a>	Montclair	Guidepost A LLC	B&P Realty and Management LLC and Lenlo Realty LLC	7/10/2020	3551 Waterway Drive, Montclair, VA, 22025	GGE	\$0
<a href="#"><u>40.</u></a>	North Scottsdale	Guidepost A LLC	3501 W. Segerstrom LLC	7/8/2020	20624 N 76th St, Scottsdale, AZ, 85255	GGE	\$0
<a href="#"><u>41.</u></a>	North Wales	Guidepost A LLC	Upper Gwynedd Equities LLC	8/13/2021	467 Sumneytown Pike, Suite 200, Upper Gwynedd, PA, 19454	CEA	\$0
<a href="#"><u>42.</u></a>	Old Town	HGE FIC L LLC	Onni Atrium Development LP	1/16/2020	311 W. Division Street, Chicago, IL, 60610	CEA	\$0
<a href="#"><u>43.</u></a>	Palm Beach Gardens	HGE FIC I LLC	FORTIS A LLC	6/22/2020	353 Hiatt Drive, Palm Beach Gardens, FL, 33418	CEA	\$0
<a href="#"><u>44.</u></a>	Paradise Valley	HGE FIC L LLC	DV 20 AC LIMITED LIABILITY PARTNERSHIP	6/21/2021	4856 E Greenway Road, Scottsdale,	CEA	\$0

<u><a href="#">Ok.</a></u> No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
					AZ, 85254		
<u><a href="#">45.</a></u>	Peoria	HGE FIC E LLC	SS Peoria Arizona, LLC	2/26/2018	20565 Fletcher Way, Peoria, AZ, 85382	CEA	\$0
<u><a href="#">46.</a></u>	Plum Canyon	HGE FIC F LLC	Intertex Plum Canyon, LLC	5/1/2018	19141 Skyline Ranch Road, Santa Clarita, CA, 91350	CEA	\$0
<u><a href="#">47.</a></u>	Reston	Guidepost A LLC	DAYCARE PROPERTIES, LLC	11/17/2015	11579 Cedar Chase Road, Reston, VA, 20170	GGE	\$0
<u><a href="#">48.</a></u>	Richardson	Guidepost Richardson LLC	1140 W Campbell Road LLC	3/21/2023	1140 W. Campbell Road, Richardson, TX, 75080	CEA	\$0
<del>52.</del>	<del>Round Rock</del>	<del>Guidepost A- LLC</del>	<del>7210 Wyoming Springs- Property, LLC</del>	<del>7/1/2020</del>	<del>7210 Wyoming Springs Drive, Round Rock, TX, 78681</del>	<del>TNC</del>	<del>\$0</del>
<del>53.</del>	<del>San Rafael</del>	<del>HGE FIC L LLC</del>	<del>Quattro San Rafael LLC</del>	<del>2/21/2022</del>	<del>11 Professional Center Parkway, San Rafael, CA, 94903</del>	<del>CEA</del>	<del>\$0</del>
<u><a href="#">49.</a></u>	Somerset	Guidepost A LLC	Jans Realty LLC	9/15/2020	121 Pierce Drive, Somerset, NJ, 08873	GGE	\$0
<u><a href="#">50.</a></u>	South Beaverton	Guidepost A LLC	Beaverton 12650 LLC	4/1/2021	12650 SW Brockman, Beaverton, OR, 97008	GGE	\$0
<u><a href="#">51.</a></u>	South Naperville	HGE FIC F LLC	The Janet Fargo Exemption Trust and Labonnevie Ventures, LLC	12/11/2018	5051 Ace Lane, Naperville, IL, 60564	CEA	\$0
<u><a href="#">52.</a></u>	South Riding	GUIDEPOST SOUTH RIDING	Hanoy Virginia	10/15/2020	43181 Amberwood Plaza, Chantilly, VA, 20152	CEA	\$0
<u><a href="#">53.</a></u>	The Woodlands	GUIDEPOST THE WOODLANDS LLC	CQFT, LLC	7/26/2022	2280 Buckthorne Place, Spring, TX, 77380	CEA	\$0

<u>Ok.</u> No.	School Name	Debtor-Tenant	Landlord/Counterparty	Lease Date	School Address	Proposed Assignee	Proposed Cure Amount
<a href="#"><u>54.</u></a>	Timber Ridge	HGE FIC B LLC	CASA Timber Ridge, LLC	4/25/2017	2550 Timber Ridge Dr., Frisco, TX, 75034	CEA	\$0
<a href="#"><u>55.</u></a>	West Alex	Guidepost A LLC	WRI Gateway Alexandria, LLC	6/12/2019	3475 N. Beauregard Street, Suite 301, Alexandria, VA, 22302	GGE	\$0
<del>61.</del>	<del>Westlake</del>	<del>HGE FIC K LLC</del>	<del>BWO Acquisition, Ltd.</del>	<del>10/16/2013</del>	<del>4613 B Bee Caves Road, West Lake Hills, TX, 78746</del>	<del>TNC</del>	<del>\$0</del>
<a href="#"><u>56.</u></a>	Wicker Park	HGE FIC B LLC	555 Bryant Partners, LLC	4/20/2017	1530 North Damen Avenue, Chicago, IL, 60622	CEA	\$0
<a href="#"><u>57.</u></a>	Williamsburg	HGE FIC C LLC	QUEEN GARDENS REALTY LLC	1/2/2018	717 Driggs Avenue, Brooklyn, NY, 11211	CEA	\$0
<a href="#"><u>58.</u></a>	Worthington	HGE FIC I LLC	AUDRA ROBBINS, AS SOLE TRUSTEE OF THE ROBBINS TRUST DATED 8/31/2018	8/17/2021	125 Dillmont Dr., Columbus, OH, 43236	CEA	\$0

<b>Summary report:</b> <b>Litera Compare for Word 11.7.0.54 Document comparison done on</b> <b>9/21/2025 4:19:22 PM</b>	
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