

Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75242
(214) 767-8967
Meredyth A. Kippes
for the United States Trustee
meredyth.kippes@usdoj.gov

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

In re:	§	Case No. 25-80121-mvl-11
	§	
HIGHER GROUND EDUCATION, INC.,	§	(Jointly Administered)
et al.,	§	
	§	Chapter 11
<i>Debtors-in-Possession.</i>	§	

**MOTION OF THE UNITED STATES TRUSTEE FOR A STAY OF HEARING ON
DEBTOR'S MOTION FOR ENTRY OF AN ORDER (I) CONDITIONALLY
APPROVING THE DISCLOSURE STATEMENT (II) SCHEDULING A COMBINED
DISCLOSURE STATEMENT APPROVAL AND PLAN CONFIRMATION HEARING;
(III) ESTABLISHING A PLAN AND DISCLOSURE STATEMENT OBJECTION
DEADLINE AND RELATED PROCEDURES; (IV) APPROVING THE SOLICITATION
AND NOTICE PROCEDURES; AND (V) GRANTING RELATED RELIEF IN LIGHT
OF LAPSE OF APPROPRIATIONS**

The United States Trustee for Region 6 moves under Fed. R. Bankr. P. 9013, and under all other applicable statutes and rules, for a stay of hearing on *Debtors' Motion for Entry of an Order (I) Conditionally Approving the Disclosure Statement; (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing; (III) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures; (IV) Approving the Solicitation and Notice Procedures; and (V) Granting Related Relief* (the "Conditional Approval Motion" Docket No. 98) in the above-captioned case.

1. At the end of the day on September 30, 2025, the appropriations act that had been funding the Department of Justice (the "Department") expired and appropriations to the Department lapsed.

Motion for Stay of Hearing Due to Lapse in Funding



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The Department does not know when funding will be restored by Congress.

2. Absent an appropriation or continuing resolution, Department of Justice attorneys and employees, including the United States Trustee and her staff, are prohibited from working, even on a voluntary basis, except in very limited circumstances, including “emergencies involving the safety of human life or the protection of property.” 31 U.S.C. § 1342.

3. Undersigned counsel for the Department of Justice, through the United States Trustee, therefore, requests a stay of the hearing on the Conditional Approval Motion, currently set on October 14, 2025 at 9:30 a.m., until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department, including the United States Trustee Program. The United States Trustee requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations – *i.e.*, each deadline would be extended by the total number of days of the lapse in appropriations.

5. On October 1, 2025, counsel for the United States Trustee contacted Debtors’ counsel via email regarding the relief requested in this motion. Counsel for the Debtors, Tim Mohan, represented to counsel for the United States Trustee to state that he objects to the relief requested in this motion.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the United States Trustee hereby moves for a stay of the hearing on the Conditional Approval Motion in the above-captioned case until Department of Justice attorneys are permitted to resume their usual civil litigation functions.

DATED: October 1, 2025.

Respectfully submitted,

LISA L. LAMBERT
UNITED STATES TRUSTEE

/s/ Meredyth A. Kippes
Meredyth A. Kippes
Trial Attorney
Texas State Bar No. 24007882
Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75242
(214) 767-1079
meredyth.kippes@usdoj.gov

Certificate of Service

The undersigned counsel certifies that copies of the foregoing document were served on October 1, 2025 via ECF to those parties requesting service via ECF in this case and to the parties listed below via electronic mail.

/s/ Meredyth A. Kippes
Meredyth A. Kippes

Holland N. O'Neil
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201
honeil@foley.com

Timothy C. Mohan
FOLEY & LARDNER LLP
1144 15th Street, Suite 2200
Denver, CO 80202
tmohan@foley.com

Nora J. McGuffey
Quynh-Nhu Truong
FOLEY & LARDNER LLP
1000 Louisiana Street, Suite 2000
Houston, TX 77002
nora.mcguffey@foley.com
qtruong@foley.com

Jason S. Brookner
Aaron M. Kaufman
Amber M. Carson
Emily F. Shanks
GRAY REED
1601 Elm Street, Suite 4600
Dallas, Texas 75201
jbrookner@grayreed.com
akaufman@grayreed.com
acarson@grayreed.com
eshanks@grayreed.com