

Holland N. O'Neil (TX 14864700)
Thomas C. Scannell (TX 24070559)
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, TX 75201
Telephone: (214) 999-3000
Facsimile: (214) 999-4667
honeil@foley.com
tscannell@foley.com

Timothy C. Mohan
(admitted *pro hac vice*)
FOLEY & LARDNER LLP
1144 15th Street, Suite 2200
Denver, CO 80202
Telephone: (720) 437-2000
Facsimile: (720) 437-2200
tmohan@foley.com

Nora J. McGuffey (TX 24121000)
Quynh-Nhu Truong (TX 24137253)
FOLEY & LARDNER LLP
1000 Louisiana Street, Suite 2000
Houston, TX 77002
Telephone: (713) 276-5500
Facsimile: (713) 276-5555
nora.mcguffey@foley.com
qtruong@foley.com

**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> , ¹	§	Case No.: 25-80121-11 (MVL)
	§	
Debtors.	§	(Jointly Administered)

**AMENDED AGENDA FOR MATTERS SCHEDULED FOR
HEARING TO BE HELD ON OCTOBER 14, 2025, AT 9:30 A.M.**

Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby file their amended agenda for the hearing on **Tuesday, October 14, 2025, at 9:30 A.M. (prevailing Central Time)**, before the Honorable Michelle V. Larson, U.S. Bankruptcy Judge for the Northern District of Texas (the “Hearing”).

The Debtors will ask the Court to consider the following:

¹ 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 Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); 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.

I. Matter to be Heard:

A. *Motion of the United States Trustee 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 [Docket No. 522 Filed on 10/01/2025]*

i. Related Documents: None

ii. Response Deadline: Prior to Hearing

iii. Responses:

a. *Debtors' Objection to Motion of the United States Trustee 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 [Docket No. 524].*

iv. Status: This matter will go forward.

B. *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 [Docket No. 99; Filed on 6/27/2025]*

i. Related Documents:

a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15];*

b. *Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Affiliated Debtors [Docket No. 94];*

c. *Disclosure Statement for the Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Affiliated Debtors [Docket No. 97];*

d. *Notice of Filing of First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors [Docket No. 527];*

- e. *First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 528];
- f. *Notice of Filing of First Amended Disclosure for the First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 529];
- g. *First Amended Disclosure for the First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 530];
- h. *Notice of Filing of Revised Proposed 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* [Docket No. 531];
- i. *Notice of Filing of Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 548];
- j. *Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 549];
- k. *Notice of Filing of Second Amended Disclosure for the Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 550];
- l. *Second Amended Disclosure for the Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 551];
- m. *Notice of Filing of Further Revised Proposed 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* [Docket No. 552]; and

- n. *Debtors' Reply in Support of 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* [Docket No. 554].
- ii. Response Deadline: October 10, 2025 at 5:00 p.m. (prevailing Central Time).
- iii. Responses:
 - a. *Objection to: (A) Disclosure Statement for the Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Affiliated Debtors; and (B) the 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* [Docket No. 169];
 - (i) *Notice of Withdrawal of Disclosure Statement Objection* [Docket No. 169] [Docket No. 538].
 - b. *Objection of Carl Barney to Disclosure Statement* [Docket No. 285];
 - (i) *Notice of Withdrawal of Disclosure Statement Objection* [Docket No. 547]
 - c. *United States Trustee's Objection to (A) 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 and (B) Conditional Approval of Disclosure Statement for the Joint Plan of Reorganization of Higher Ground Education, Inc., and Its Affiliated Debtors* [Docket No. 390];
 - d. *The Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights to the Debtors' Motions Scheduling for Hearing on August 29, 2025, and (B) Related Relief* [Docket No. 400]; and
 - e. *Objection to Debtors' First Amended Disclosure Statement* [Docket No. 545].

- iv. Status: This matter will go forward pending the outcome of the U.S. Trustee's Motion for Stay of Hearing [Docket No. 522].

C. *Sheens Watkins' Motion for Relief from the Automatic Stay* [Docket No. 511; Filed on 9/26/2025]

- i. Related Documents: None
- ii. Response Deadline: October 10, 2025.
- iii. Responses:
 - a. *Debtors' Limited Objection and Reservation of Rights to Sheena Watkins's Motion for Relief from the Automatic Stay* [Docket No. 539]; and
 - b. *The Committee's Joinder to Debtors' Limited Objection and Reservation of Rights to Sheena Watkins's Motion for Relief from the Automatic Stay* [Docket No. 544].
- iv. Status: This matter will go forward.

II. Witness and Exhibits Lists:

- A. *Debtors' Witness and Exhibit List for October 14, 2025 Hearing* [Docket No. 540];
- B. *The Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled on October 14, 2025* [Docket No. 541]; and
- C. *Debtors' Amended Witness and Exhibit List for October 14, 2025 Hearing* [Docket No. 553]

III. Notices of Hearing:

- A. *Notice of Adjourned and Continued Hearing* [Docket No. 458];
- B. *Notice of Hearing on Sheena Watkins' Motion for Relief from the Automatic Stay* [Docket No. 526]; and
- C. Docket Entry: Hearing set re: Docket No. 522 [Docket No. 532].

IV. Certificates of Service:

- A. *Certificate of Service* re: Docket Nos. 456, 457, 458 [Docket No. 508]; and
- B. *Certificate of Service* re: Docket Nos. 527, 528, 529, 530, 531 [Docket No. 537].

DATED: October 13, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700)

Thomas C. Scannell (TX 24070559)

FOLEY & LARDNER LLP

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000

Facsimile: (214) 999-4667

honeil@foley.com

tscannell@foley.com

-and-

Timothy C. Mohan (admitted *pro hac vice*)

FOLEY & LARDNER LLP

1144 15th Street, Suite 2200

Denver, CO 80202

Telephone: (720) 437-2000

Facsimile: (720) 437-2200

tmohan@foley.com

-and-

Nora J. McGuffey (TX 24121000)

Quynh-Nhu Truong (TX 24137253)

FOLEY & LARDNER LLP

1000 Louisiana Street, Suite 2000

Houston, TX 77002

Telephone: (713) 276-5500

Facsimile: (713) 276-5555

nora.mcguffey@foley.com

qtruong@foley.com

**COUNSEL TO DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2025, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Nora J. McGuffey
Nora J. McGuffey