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*Attorney for Creditors, Duc Viet Nguyen,
Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora*

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

IN RE:	§	Chapter 11
	§	
HIGHER GROUND EDUCATION, INC., et al.,¹	§	Case No. 25-80121-11 (MVL)
	§	
Debtors.	§	(Jointly Administered)

**NOTICE OF HEARING ON MOVANTS'
MOTION FOR RULE 2004 EXAMINATIONS OF
EB5AN, LLC, F/K/A EB5 AFFILIATE NETWORK, LLC**

PLEASE TAKE NOTICE that a hearing on Duc Viet Nguyen, Thuy Thi Thu Nguyen, and
Dixit Kishorkumar Vora (the “*Movants*”)’ Motion for Rule 2004 Examinations of EB5AN, LLC,
f/k/a EB5 Affiliate Network, LLC [Docket No. 617] has been set for **December 3, 2025 at 9:30**

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.



a.m. in the Courtroom of the Honorable Michelle V. Larson, at 1100 Commerce Street, 14th Floor, Courtroom #2, Dallas, Texas 75242.

The hearing will be conducted in hybrid format – both in-person and via WebEx. Parties are invited to participate in the hearing remotely via WebEx:

For WebEx Video Participation/Attendance:

Link: <https://us-courts.webex.com/meet/larson>

Meeting Number: 23014761957

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1.650.479.3207

Access code: 2301 476 1957

Parties are directed to review the attached WebEx Hearing Instructions issued by Clerk's Notice 2024-01.

Dated: November 3, 2025

Respectfully submitted,

By: /s/ Daniel J. Ferretti

DANIEL J. FERRETTI

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***Attorney for Creditors, Duc Viet Nguyen,
Thuy Thi Thu Nguyen, and Dixit
Kishorkumar Vora***

CERTIFICATE OF SERVICE

The undersigned certifies that on November 3, 2025, a true and correct copy of the foregoing document was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system, including but not limited to counsel for the Debtor, the Official Committee of Unsecured Creditors, and the U.S. Trustee, and on the parties below via First-Class, United States mail, postage prepaid:

Debtor: Higher Ground Education, Inc., <i>et al.</i> 1321 Upland Dr. PMB 20442 Houston, Texas 77043	Examinee: EB5AN, LLC Registered Agents Inc. 7901 4th Street North Suite 300 St. Petersburg, FL 33702
	EB5AN, LLC 5500 Military trail Suite 22-260 Jupiter, FL 33458
	EB5AN, LLC c/o Daniel Lundy Chiesa Shahinian & Giantomasi PC 11 Times Square, 34 th Floor New York, NY 10036
	EB5AN, LLC c/o Christopher M. Candon Sheehan Phinney 1000 Elm Street, 17th Floor Manchester, NH 03101

/s/ Daniel J. Ferretti

Daniel J. Ferretti

WebEx Hearing Instructions

Judge Michelle V. Larson

Pursuant to Clerk's Notice 2024-01 issued by the Court on May 14, 2024, certain hearings before Judge Michelle V. Larson will be conducted by WebEx videoconference.

For WebEx Video Participation/Attendance:

Link: <https://us-courts.webex.com/meet/larson>

Meeting Number: 23014761957

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1.650.479.3207

Access code: 2301 476 1957

Participation/Attendance Requirements:

- Counsel and other parties in interest who plan to actively participate in the hearing are encouraged to attend the hearing in the WebEx video mode using the WebEx video link above. Counsel and other parties in interest who will not be seeking to introduce any evidence at the hearing and who wish to attend the hearing in a telephonic only mode may attend the hearing in the WebEx telephonic only mode using the WebEx dial-in and meeting ID above.
- Attendees should join the WebEx hearing at least 10 minutes prior to the hearing start time. Please be advised that a hearing may already be in progress. During hearings, participants are required to keep their lines on mute at all times that they are not addressing the Court or otherwise actively participating in the hearing. The Court reserves the right to disconnect or place on permanent mute any attendee that causes any disruption to the proceedings. For general information and tips with respect to WebEx participation and attendance, please see Clerk's Notice 20-04: https://www.txnb.uscourts.gov/sites/txnb/files/hearings/Webex%20Information%20and%20Tips_0.pdf
- **Unless the Court orders otherwise, witnesses are required to attend the hearing in the WebEx video mode and live testimony will only be accepted from witnesses who have the WebEx video function activated.** Telephonic testimony without accompanying video will not be accepted by the Court.
- All WebEx hearing attendees are required to comply with Judge Larson's Telephonic and Videoconference Hearing Policy (included within Judge Larson's Judge-Specific Guidelines): <https://www.txnb.uscourts.gov/content/judge-michelle-v-larson-0>

Exhibit Requirements:

- Any party intending to introduce documentary evidence at the hearing must file an exhibit list in the case prior to the hearing, with a true and correct copy of each designated exhibit filed as a separate, individual attachment thereto so that the Court and all participants have ready access to all designated exhibits.
- If the number of pages of such exhibits exceeds 100, then such party must also deliver two (2) sets of such exhibits in exhibit binders to the Court by no later than twenty-four (24) hours in advance of the hearing.

Notice of Hearing Content and Filing Requirements:

IMPORTANT: For all hearings that will be conducted by WebEx only:

- The Notice of Hearing filed in the case and served on parties in interest must: (1) provide notice that the hearing will be conducted by WebEx videoconference only, (2) provide notice of the above WebEx video participation/attendance link, and (3) attach a copy of these WebEx Hearing Instructions or provide notice that they may be obtained from Judge Larson's hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-larson-hearing-dates>

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- When electronically filing the Notice of Hearing via CM/ECF select “at <https://us-courts.webex.com/meet/larson>” as the location of the hearing (note: this option appears immediately after the first set of Wichita Falls locations). Do not select Judge Larson’s Dallas courtroom as the location for the hearing.

- **Notice to Members of the Public.** While the Judicial Conference of the United States relaxed its broadcasting policies during the COVID-19 Pandemic due to restrictions placed on in-person attendance at hearings and trials, these policies will expire and no longer be in effect after September 21, 2023. As a result, after September 21, 2023, remote *video* access to Court hearings shall ***only be available for case participants*** (parties-in-interest and their professionals) and non-case participants are not permitted to attend any hearing by remote *video* means. In certain circumstances, non-case participants may be permitted to attend proceedings by remote *audio* means, but only if no witness testimony is to be provided. The presiding judge may take any action deemed necessary or appropriate to address any unauthorized remote attendance at a hearing or trial. For the avoidance of doubt, members of the public will continue to generally be permitted to attend proceedings in person, in the courtroom.