Daniel J. Ferretti

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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:

S
Chapter 11
S
HIGHER GROUND EDUCATION,
INC., et al., 1
S
Debtors.

S
(Jointly Administered)

## NOTICE OF WITHDRAWAL OF DUC VIET NGUYEN, THUY THI THU NGUYEN, AND DIXIT KISHORKUMAR VORA'S OBJECTION TO CONFIRMATION OF THE SECOND AMENDED JOINT PLAN OF REORGANIZATION AND TO FINAL APPROVAL OF THE SECOND AMENDED DISCLOSURE STATEMENT

Duc Viet Nguyen, Thuy Thi Thu Nguyen, Dixit Kishorkumar Vora (together, the "FIC-I

Investor Claimants" or "Objectors"), each a Class B Member of HGE FIC I LLC ("FIC-I" or the

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.



"NCE"), hereby provide notice of the withdrawal of their Objection to Confirmation of the Second Amended Joint Plan of Reorganization and to Final Approval of the Disclosure Statement (ECF No. 642). The Modified Second Amended plan filed with the Court (ECF No. 649) addresses the concerns raised by the Objectors in their Objection and the Objectors appreciate the Debtors, the Committee, and the other parties' good faith efforts to resolve those concerns.

Dated: November 20, 2025. Respectfully submitted,

By: /s/ Daniel J. Ferretti
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## **CERTIFICATE OF SERVICE**

The undersigned certifies that on November 20, 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 Debtors, the Unsecured Creditors Committee, and the U.S. Trustee and via U.S. mail on the Debtors at their service address of 1321 Upland Dr. PMB 20442, Houston, Texas 77043.

/s/ Daniel J. Ferretti

Daniel J. Ferretti