

**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)

**DECLARATION OF ADAM J. GORMAN WITH RESPECT TO THE TABULATION
OF VOTES ON THE SECOND AMENDED JOINT PLAN OF REORGANIZATION OF
HIGHER GROUND EDUCATION, INC. AND ITS AFFILIATED DEBTORS, AND THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS PURSUANT TO CHAPTER
11 OF THE BANKRUPTCY CODE**

I, Adam J. Gorman, depose and say under the penalty of perjury:

1. I am a Director at Kurtzman Carson Consultants LLC dba Verita Global ("Verita"), which has offices located at 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245. I am above eighteen years of age, and I am competent to testify. Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision, and my review of relevant documents. I am authorized to submit this declaration (the "Declaration") on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

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.



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2. I submit this Declaration regarding the solicitation of votes and the tabulation of Ballots cast on the *Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 549] (as may be further revised, supplemented, modified and/or amended from time to time, the “Plan”).

3. The Court authorized Verita’s retention (a) as claims and noticing agent to the Debtors on June 20, 2025, pursuant to the *Order Authorizing Debtors’ Application for the Retention and Employment of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing and Solicitation Agent, Effective as of the Petition Date* [Docket No. 58] (the “Retention Order”). The Retention Order authorizes Verita to assist the Debtors with, among other things, the service of solicitation materials and tabulation of votes cast to accept or reject the Plan. Verita and its employees have considerable experience in soliciting and tabulating votes to accept or reject chapter 11 plans.

4. On October 15, 2025, the Court entered the *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. 568] (the “Disclosure Statement Order”),² establishing, among other things, the Solicitation Procedures. Verita adhered to the procedures outlined in the Disclosure Statement Order and caused the solicitation packages (the “Solicitation Packages”) to be distributed to parties entitled to vote on the Plan. I supervised the solicitation and tabulation performed by Verita’s employees.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Plan or the Disclosure Statement Order, as applicable.

A. Service and Transmittal of Solicitation Packages and Related Information.

5. Pursuant to the Disclosure Statement Order, on October 17, 2025, and from time to time thereafter, Verita caused the Solicitation Package to be served on all known Holders of Claims in Class 1 (Bridge CN-3 Secured Lender Claim), Class 2 (WTI Secured Lender Claim), Class 3 (CN-1 Note Claims), Class 4 (CN-2 Note Claims), Class 5 (CN-3 Note Claims) and Class 8 (General Unsecured Claims) (together, the “Voting Classes”). The following materials constitute the Solicitation Package distributed to Holders of Claims in the Voting Classes: (a) the applicable form of Ballot, together with detailed voting instructions, and instructions on how to submit the Ballot; (b) the Official Committee of Unsecured Creditors Letter to All Holders of Claims Entitled to Vote on the Plan (the “UCC Letter”); (c) the *Notice of (I) Hearing on the Disclosure Statement and Confirmation of the Joint Chapter 11 Plan of Reorganization of the Debtors and the Committee, (II) Deadline to Cast Votes to Accept or Reject the Plan, and (III) Objection and Opt Out Right* (the “Combined Hearing Notice”); (d) the Disclosure Statement (and exhibits thereto, including the Plan); (e) the Disclosure Statement Order (without exhibits, except for the Solicitation Procedures); (f) a pre-addressed, postage pre-paid reply envelope; and (g) any additional documents that the Bankruptcy Court has ordered to be made available.

6. In lieu of a Solicitation Package, all known Holders of Claims and Interests in Class 6 (Other Secured Claims), Class 7 (Non-Tax Priority Claims), Class 9 (Intercompany Claims), Class 10 (Equity), and Class 11 (Subsidiary Equity Interests) (collectively, the “Non-Voting Classes”), received a (a) Non-Voting Status Notice and Release Opt-Out Form; (b) the Combined Hearing Notice; and (c) a pre-addressed, postage pre-paid reply envelope. Furthermore, Verita caused the Combined Hearing Notice to be served on all known Holders of Claims or Interests and the 2002 List (regardless of whether such parties are entitled to vote on the Plan) and all other parties required

to receive such notice pursuant to the Disclosure Statement Order. A *Certificate of Service* evidencing the completion of solicitation was filed with the Court on October 29, 2025 [Docket No. 619] (the “*Solicitation Certificate of Service*”).

7. On October 17, 2025, Verita posted links to the electronic versions of the Disclosure Statement, the Disclosure Statement Order, the Plan, the Non-Voting Status Notice and Release Opt-Out Form, Combined Hearing Notice, and the UCC Letter on the public access website at www.veritaglobal.net/higherground.

8. On October 17, 2025, the Publication Notice was published in *The Wall Street Journal* (national edition). The *Proof of Publication*, an affidavit evidencing the publication of the Publication Notice, was filed with the Court on November 3, 2025 [Docket No. 623].

B. The Tabulation Process.

9. The Disclosure Statement Order established September 1, 2025, as the Voting Record Date to determine which Holders of Claims and Interests were entitled to receive the Solicitation Package or the Non-Voting Status Notice and Release Opt-Out Form, as applicable. Pursuant to the Disclosure Statement Order, Holders of Claims in Class 1 (Bridge CN-3 Secured Lender Claim), Class 2 (WTI Secured Lender Claim), Class 3 (CN-1 Note Claims), Class 4 (CN-2 Note Claims), Class 5 (CN-3 Note Claims) and Class 8 (General Unsecured Claims) were entitled to vote to accept or reject the Plan. No other Classes were entitled to vote on the Plan.

10. In accordance with the Solicitation Procedures, Verita worked closely with the Debtors’ advisors to identify the Holders of Claims in the Voting Classes entitled to vote as of the Voting Record Date, and to coordinate the distribution of Solicitation Packages to such Holders. A detailed description of Verita’s distribution of Solicitation Packages is set forth in the Solicitation Certificate of Service.

11. In accordance with the Solicitation Procedures, Verita received, reviewed, determined the validity of, and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to Verita was date-stamped, scanned, assigned a Ballot number, entered into Verita's voting database, and processed. To be included in the tabulation results as valid, a Ballot must have been (a) properly completed pursuant to the Solicitation Procedures, (b) executed by the relevant Holder entitled to vote on the Plan (or such Holder's representative), (c) returned to Verita via an approved method of delivery set forth in the Solicitation Procedures unless the delivery method requirement was waived by the Debtors, and (d) received by Verita on or before November 17, 2025, at 5:00 p.m. (prevailing Central Time) (the "Voting Deadline"). Verita completed its final tabulation of the Ballots on November 18, 2025, following a complete review and audit of all Ballots received.

12. The final tabulation of votes cast by timely and properly completed Ballots received by Verita is attached hereto as **Exhibit A** and set forth below:

Total Ballots Received			
Accept		Reject	
Number (% of Number)	Amounts (% of Amount)	Number (% of Number)	Amount (% of Amount)
Class 1 – Bridge CN3 Secured Lender Claim			
2 (100%)	\$2,075,821.92 (100%)	0 (0%)	\$0.00 (0%)
Class 2 – WTI Secured Lender Claim			
2 (100%)	\$4,410,970.83 (100%)	0 (0%)	\$0.00 (0%)
Class 3 – CN-1 Note Claims			
8 (100%)	\$9,594,054.65 (100%)	0 (0%)	\$0.00 (0%)
Class 4 – CN-2 Note Claims			
1 (100%)	\$34,955,324.67 (100%)	0 (0%)	\$0.00 (0%)
Class 5 – CN-3 Note Claims			
2 (100%)	\$29,192,959.73 (100%)	0 (0%)	\$0.00 (0%)
Class 8 – General Unsecured Claims			
66 (81.48%)	\$139,694,667.04 (59.28%)	15 (18.52%)	\$95,963,757.62 (40.72%)

C. Ballots That Were Not Counted.

13. A report of any Ballots from parties in the Voting Classes excluded from the final tabulation, and the reasons for exclusion of such Ballots, is attached hereto as **Exhibit B**. All such Ballots were not counted because they did not satisfy the requirements for a valid Ballot set forth in the Disclosure Statement Order.

D. Opt Out Election.

14. Verita also reviewed and documented elections recorded on (i) the Ballots from Holders of Claims in the Voting Classes that abstained or rejected the Plan and checked the box on such Ballot to opt out of the Third-Party Releases and (ii) the Opt Out Forms from non-voting

Holders of Claims and Interests. A report of all Entities who opted out of the Third-Party Releases by checking the opt out box on the Opt Out Form or checked the opt out box and abstained or rejected the Plan on their Ballot is attached hereto as **Exhibit C**. As further detailed in **Exhibit C**, the opt out process proved successful based on the participation rates among the Voting Classes and Non-Voting Classes. Notably sixty-four (64) parties elected to opt out of the Third-Party Releases. For the avoidance of doubt, this Declaration does not certify the validity or enforceability of any opt out elections received, including those reported on **Exhibit B**, but rather is providing these opt out election results for reporting and informational purposes only.

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To the best of my knowledge, information and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots in connection with the Plan is true.

Dated: November 20, 2025

/s/ Adam J. Gorman

Adam J. Gorman
Director
Verita Global

Exhibit A

Class Name	Class Description	Total Members	Members Voted	Members Accepted	Members Rejected	% Members Accepted	% Members Rejected	Total \$ Voted	\$ Accepted	\$ Rejected	% \$ Accepted	% \$ Rejected
1	Bridge CN3 Secured Lender Claim	4	2	2	0	100.00	0.00	\$2,075,821.92	\$2,075,821.92	\$0.00	100.00	0.00
2	WTI Secured Lender Claim	4	2	2	0	100.00	0.00	\$4,410,970.83	\$4,410,970.83	\$0.00	100.00	0.00
3	CN1 Note Claims	50	8	8	0	100.00	0.00	\$9,594,054.65	\$9,594,054.65	\$0.00	100.00	0.00
4	CN2 Note Claims	4	1	1	0	100.00	0.00	\$34,955,324.67	\$34,955,324.67	\$0.00	100.00	0.00
5	CN3 Note Claims	12	2	2	0	100.00	0.00	\$29,192,959.73	\$29,192,959.73	\$0.00	100.00	0.00
8	General Unsecured Claims	409	81	66	15	81.48	18.52	\$235,658,424.66	\$139,694,667.04	\$95,963,757.62	59.28	40.72

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
2Hr Learning Inc	11/16/2025	96	\$1,044,794.52	Accept
Learn Capital Iv Special Opportunities X LLC	11/17/2025	97	\$1,031,027.40	Accept

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
Venture Lending & Leasing IX, Inc.	10/28/2025	18	\$153,801.58	Accept
WTI Fund X, Inc.	10/28/2025	19	\$4,257,169.25	Accept

Class 3 Ballot Detail
(CN-1 Note Claims)

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
J R & A Garibaldi Trust Dtd Dec 22 2014	11/11/2025	65	\$25,000.00	Accept
John Steller	11/14/2025	79	\$297,198.50	Accept
Learn Capital Fund V Growth L P	11/17/2025	99	\$9,062,608.37	Accept
Moontower Education Inc	11/09/2025	52	\$15,000.00	Accept
Paul Crockett	10/22/2025	8	\$5,000.00	Accept
Reena Maharaj and Zubin Maharaj	11/14/2025	85	\$57,000.00	Accept
Sternheim Family Trust 5 17 2005	11/16/2025	98	\$25,000.00	Accept
Yu Hge G LLC	11/05/2025	40	\$107,247.78	Accept

Creditor Name	Date		Ballot No.	Voting Amount	Vote
	Received				
Learn Capital Fund V Growth L P	11/17/2025		100	\$34,955,324.67	Accept

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
Ramandeep Girn	11/13/2025	73	\$5,356,445.59	Accept
YYYYYY, LLC	11/16/2025	101	\$23,836,514.14	Accept

Exhibit A-8
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Class 8 Ballot Detail
(General Unsecured Claims)

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
109 Natches Trace LLC	11/11/2025	69	\$2,740,185.73	Accept
18265 Highway 49 LLC	11/17/2025	122	\$2,422,545.49	Accept
214 E Hallandale Beach LLC	11/14/2025	55	\$31,072,411.99	Reject
2515 N. Wauwatosa LLC	10/21/2025	3	\$13,109,055.85	Accept
479 Clinton Avenue Corp	11/14/2025	114	\$4,216,667.72	Accept
6575 Oakwood Blvd LLC	11/16/2025	106	\$2,695,244.00	Accept
9930 Valley Ranch Pkwy LLC	11/11/2025	66	\$3,106,300.51	Accept
A.C.S.	11/17/2025	117	\$1,000,000.00	Reject
A.H.S.	11/17/2025	120	\$1,000,000.00	Reject
ACDC dba Anago of Colorado	11/06/2025	45	\$3,899.98	Accept
Akers Advisory Group LLC dba City Wide Facility Solutions of Nashville	10/24/2025	15	\$60,673.56	Accept
Alaa Hussein	10/22/2025	9	\$24,000.00	Accept
Amazing Athletes of Central Texas	11/06/2025	47	\$1,890.00	Accept
Aztlan	10/24/2025	17	\$500.00	Accept
Bobs Backflow & Plumbing Services Inc	10/22/2025	10	\$125.00	Accept
Brian Alspach	10/21/2025	5	\$282,850.00	Reject
Carl Barney Individually and as Trustee of The Carl Barney Living Trust	11/04/2025	35	\$30,000,000.00	Reject
Carl R Freund Trustee of Irrev Trust Winifred Freund	11/14/2025	86	\$106,441.85	Reject
Champlin 6251 LLC	11/11/2025	58	\$307,188.00	Accept
Chase Simon	11/17/2025	118	\$1,000,000.00	Reject
Christopher Harvin dba Cardinal Facilities Management	11/17/2025	109	\$8,260.40	Accept
Clairmont School and Childcare Center Inc	11/14/2025	82	\$82,383.40	Accept
Clark 6001 LLC	11/11/2025	59	\$322,563.50	Accept
Custom Lawn & Landscape Inc	11/04/2025	36	\$625.13	Accept
Davis Estates Ltd.	11/14/2025	80	\$1,808,189.84	Accept
DC Newton Wells LLC	11/05/2025	41	\$26,117,924.00	Accept
DC VA Beach Upton LLC	11/05/2025	42	\$15,142,681.00	Accept
Dimitry Braznichenko	10/21/2025	6	\$53,940.00	Accept
Fogerty, Casey	11/14/2025	87	\$100,000.00	Accept
Forest Grease & Commercial LLC	11/10/2025	54	\$280.40	Accept
Godwin, Emma	10/21/2025	2	\$1.00	Accept
Guidepost Financial Partner LLC	11/11/2025	60	\$27,470,918.47	Accept
Guidepost Global Education, Inc.	11/17/2025	110	\$8,376,288.83	Accept
Hart, Victoria	11/17/2025	115	\$2,052.00	Accept
Heritage Crossing Shopping Center Association	11/11/2025	68	\$762.10	Accept
Illinois Carolina Partners LLC dba City Wide Facility Solutions Chicago North	11/11/2025	57	\$4,515.80	Accept

Exhibit A-8
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Class 8 Ballot Detail
(General Unsecured Claims)

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
Jessica Abbott	11/17/2025	111	\$985.72	Reject
K.R. a Minor Child	11/06/2025	48	\$100,000.00	Reject
Kaplin Stewart Meloff Reiter & Stein PC	11/04/2025	32	\$1,095.00	Accept
Kevork and Araksya Vartanian	10/23/2025	11	\$2,079,297.26	Accept
Kidokinetics of Central Texas	11/03/2025	29	\$1,080.00	Accept
Kusan Inc dba Quality Air Heating and Air Conditioning	10/28/2025	23	\$440.00	Accept
LFI Wheaton II LLC	11/11/2025	61	\$614,375.00	Accept
LFI Wheaton III LLC	11/11/2025	62	\$614,375.00	Accept
Lloyd H. Wells Gift Trust Dtd 11/24/1987 and Adrienne M. Wells Castaneda Gift Trust Dtd 12/12/2006	10/27/2025	20	\$252,284.04	Reject
Lock Away Wurzbach Parkway LLC	11/17/2025	113	\$4,470,509.12	Accept
Longmont GM LLC	11/17/2025	112	\$3,988,441.00	Accept
Marin Sanitary Service	11/07/2025	49	\$639.84	Accept
Mark Steenstra	10/23/2025	12	\$233,333.33	Accept
Mary Katherine DiSalvo	10/27/2025	16	\$928.58	Accept
McKinney TX Associates LLC	11/10/2025	53	\$605,473.89	Accept
Natasha Titov	11/14/2025	103	\$5,627.14	Accept
NESTAR, LLC (d/b/a Nestar III, LLC)	11/16/2025	104	\$1,453,649.56	Accept
Nicole Dunn	10/27/2025	22	\$1,400.00	Accept
North Carolina Department of Labor, Elevator and Amusement Device Bureau	11/13/2025	78	\$100.00	Accept
Orchard Clark LLC	11/11/2025	63	\$2,257,944.50	Accept
Planetary Corporation	11/05/2025	44	\$8,750.00	Accept
Prestige Fire Protection Group Inc	10/24/2025	13	\$800.00	Accept
Quattro Richmond LLC	11/17/2025	95	\$5,119,534.25	Accept
R.S.	11/17/2025	121	\$1,000,000.00	Reject
Rajani-Nema, Maya	11/08/2025	50	\$22,083.30	Accept
Rebecca Girn	11/13/2025	74	\$1,272,917.00	Accept
Red Duke Strategies LLC	11/03/2025	31	\$2,850.00	Accept
Rinetti, Jaime	10/20/2025	1	\$65,800.00	Accept
Romero, Ashlea	11/16/2025	108	\$900.00	Accept
RTS Orchards, LLC	11/14/2025	102	\$1,127,151.31	Accept
San Ramon Guidepost LLC	11/06/2025	46	\$29,144,187.77	Reject
SCH Group	11/04/2025	34	\$575,000.00	Accept
Sriram Narasimhan	10/29/2025	24	\$1.00	Accept
SS Peoria Arizona LLC	11/16/2025	107	\$7,055.02	Accept
Tal Simon	11/17/2025	119	\$1,000,000.00	Reject
TDOR c/o Attorney General	10/27/2025	21	\$2,596.25	Reject
Tremik Brantley	11/03/2025	27	\$1,964.29	Accept
Vorbeck Family LP	11/17/2025	116	\$907,832.04	Accept
WG Huntersville LLC	10/30/2025	26	\$675,694.64	Accept

Class 8 Ballot Detail
(General Unsecured Claims)

Creditor Name	Date		Voting Amount	Vote
	Received	Ballot No.		
Wilbur Rush dba Cleanup Team LLC	11/16/2025	105	\$5,200.00	Accept
Wilson, Marelbis	11/02/2025	30	\$2,000.00	Reject
Yu Capital, LLC	11/05/2025	37	\$655,717.26	Accept
YuATI LLC	11/05/2025	38	\$2,257,424.00	Accept
YuFIC B, LLC	11/05/2025	39	\$2,364,774.00	Accept
YuHGE A LLC	11/05/2025	43	\$114,848.00	Accept

Exhibit B

Ballot Excluded from Tabulation

Creditor Name	Date Received	Ballot No.	Voting Amount	Vote	Class	Reason Excluded
3501 W. Segerstrom, LLC	11/14/2025	81	\$403,576.87	Abstain	Class 8	No vote cast
Moontower Education, Inc.	11/09/2025	51	N/A	N/A	Opt-Out	No selection made
Reena Maharaj and Zubin Maharaj	11/14/2025	84	N/A	N/A	Opt-Out	No selection made
Romulus Asenloo	11/18/2025	123	\$5,792.86	Unacceptable	Class 8	Late filed
Sweeny & Sons Unlimited Inc dba City Wide Facility Solutions	10/21/2025	4	N/A	N/A	Opt-Out	No selection made

Exhibit C

Creditor Name	Date		Class	Opt Out of Release
	Received	Ballot No.		
10300 Riverside, LLC	11/04/2025	33	Non-Voting Class	Yes
109 Natches Trace LLC	11/11/2025	69	8 - General Unsecured Claims	Yes
18265 Highway 49 LLC	11/17/2025	122	8 - General Unsecured Claims	Yes
214 E Hallandale Beach LLC	11/14/2025	55	8 - General Unsecured Claims	Yes
2515 N. Wauwatosa LLC	10/21/2025	3	8 - General Unsecured Claims	Yes
6575 Oakwood Blvd LLC	11/16/2025	106	8 - General Unsecured Claims	Yes
9930 Valley Ranch Pkwy LLC	11/11/2025	66	8 - General Unsecured Claims	Yes
A.C.S.	11/17/2025	117	8 - General Unsecured Claims	Yes
A.H.S.	11/17/2025	120	8 - General Unsecured Claims	Yes
Alaa Hussein	10/22/2025	9	8 - General Unsecured Claims	Yes
Amazing Athletes of Central Texas	11/06/2025	47	8 - General Unsecured Claims	Yes
Aztlan	10/24/2025	17	8 - General Unsecured Claims	Yes
Brian Alspach	10/21/2025	7	Non-Voting Class	Yes
Brian Alspach	10/21/2025	5	8 - General Unsecured Claims	Yes
Carl Barney Individually and as Trustee of The Carl Barney Living Trust	11/04/2025	35	8 - General Unsecured Claims	Yes
Carolina Franco de Poppe	11/17/2025	93	Non-Voting Class	Yes
Champlin 6251 LLC	11/11/2025	58	8 - General Unsecured Claims	Yes
Chase Simon	11/17/2025	118	8 - General Unsecured Claims	Yes
Christopher Harvin dba Cardinal Facilities Management	11/17/2025	109	8 - General Unsecured Claims	Yes
Clark 6001 LLC	11/11/2025	59	8 - General Unsecured Claims	Yes
Cornelia Lockitch	11/11/2025	67	Non-Voting Class	Yes
Davis Estates Ltd.	11/14/2025	80	8 - General Unsecured Claims	Yes
DC Newton Wells LLC	11/05/2025	41	8 - General Unsecured Claims	Yes
DC VA Beach Upton LLC	11/05/2025	42	8 - General Unsecured Claims	Yes
Dixit Kishorkumar Vora	11/13/2025	77	Non-Voting Class	Yes
Duc Viet Nguyen	11/13/2025	75	Non-Voting Class	Yes
Fnu Kaushik Saurabh	11/17/2025	90	Non-Voting Class	Yes
Godwin, Emma	10/21/2025	2	8 - General Unsecured Claims	Yes
Guidepost Financial Partner LLC	11/11/2025	60	8 - General Unsecured Claims	Yes
Guidepost Financial Partner, LLC	11/11/2025	56	Non-Voting Class	Yes
Hart, Victoria	11/17/2025	115	8 - General Unsecured Claims	Yes
Illinois Carolina Partners LLC dba City Wide Facility Solutions Chicago North	11/11/2025	57	8 - General Unsecured Claims	Yes
Jessica Abbott	11/17/2025	111	8 - General Unsecured Claims	Yes
John Steller	11/14/2025	79	3 - CN1 Note Claims	Yes
K.R. a Minor Child	11/06/2025	48	8 - General Unsecured Claims	Yes
LFI Wheaton II LLC	11/11/2025	61	8 - General Unsecured Claims	Yes
LFI Wheaton III LLC	11/11/2025	62	8 - General Unsecured Claims	Yes
Lindsay Journo	11/14/2025	83	Non-Voting Class	Yes
Lloyd H. Wells Gift Trust Dtd 11/24/1987 and Adrienne M. Wells Castaneda Gift Trust Dtd 12/12/2006	10/27/2025	20	8 - General Unsecured Claims	Yes
Malki, Asseya	11/11/2025	64	Non-Voting Class	Yes
McKinney TX Associates LLC	11/10/2025	53	8 - General Unsecured Claims	Yes
Meghan Lamb	11/03/2025	28	Non-Voting Class	Yes
Meyer, Josefa	10/29/2025	25	Non-Voting Class	Yes
NESTAR, LLC (d/b/a Nestar III, LLC)	11/16/2025	104	8 - General Unsecured Claims	Yes
North Carolina Department of Labor, Elevator and Amusement Device Bureau	11/13/2025	78	8 - General Unsecured Claims	Yes

Exhibit C
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Opt-Out Summary

Creditor Name	Date		Class	Opt Out of Release
	Received	Ballot No.		
Orchard Clark LLC	11/11/2025	63	8 - General Unsecured Claims	Yes
Paul Crockett	10/22/2025	8	3 - CN1 Note Claims	Yes
Philip ONeill	11/12/2025	72	Non-Voting Class	Yes
Qinqin Zheng	11/16/2025	89	Non-Voting Class	Yes
Quattro Richmond LLC	11/17/2025	95	8 - General Unsecured Claims	Yes
R.S.	11/17/2025	121	8 - General Unsecured Claims	Yes
Rosemeire Aparecida Capelate de Oliveira	11/17/2025	94	Non-Voting Class	Yes
RTS Orchards, LLC	11/14/2025	102	8 - General Unsecured Claims	Yes
Samantha McLoughlin	11/12/2025	70	Non-Voting Class	Yes
SammyJDance LLC	11/12/2025	71	Non-Voting Class	Yes
Sasikiran Dadi	11/17/2025	91	Non-Voting Class	Yes
Sri Krishna Chaitanya Anne	11/17/2025	92	Non-Voting Class	Yes
SS Peoria Arizona LLC	11/16/2025	107	8 - General Unsecured Claims	Yes
Tal Simon	11/17/2025	119	8 - General Unsecured Claims	Yes
TDOR c/o Attorney General	10/27/2025	21	8 - General Unsecured Claims	Yes
Thuy Thi Thu Nguyen	11/13/2025	76	Non-Voting Class	Yes
WG Huntersville LLC	10/30/2025	26	8 - General Unsecured Claims	Yes
Yuenan Li	11/16/2025	88	Non-Voting Class	Yes
Zan Jin	10/23/2025	14	Non-Voting Class	Yes