

**O'MELVENY & MYERS LLP**

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*Counsel for RTS Orchards, LLC*

**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> ,	§	Case No. 25-80121 (MVL)
	§	
Debtors. <sup>1</sup>	§	(Jointly Administered)
	§	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE AND NOTICE**

PLEASE TAKE NOTICE that the undersigned counsel has been selected to represent RTS Orchards, LLC (“RTS”) in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), and hereby files this *Notice of Appearance and Request for Service and Notice* (the “Notice of Appearance”) pursuant to sections 342 and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Local Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), and requests that copies of all notices and pleadings given or required to be given in this Chapter 11 Cases be given to and served upon:

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/higherground>. The Debtors’ service address for these Chapter 11 Cases is 1321 Upland Dr., PMB 20442, Houston, TX 77043.



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**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rules 2002 and 9010(b) of the Bankruptcy Rules and section 1109(b) of the Bankruptcy Code, the undersigned request includes not only the notices and papers referred to in the Bankruptcy Rules, Local Rules, and sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleading or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the Chapter 11 Cases and any proceedings related thereto.

**PLEASE TAKE FURTHER NOTICE** that the undersigned hereby requests that the names and addresses set forth herein be added to the mailing matrix in this Chapter 11 Cases.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance shall not be deemed or construed to be a waiver of RTS' rights (a) to have final orders in non-core matters entered only after *de novo* review by a United States District Judge, (b) to trial by jury in any proceeding so triable in this Chapter 11 Cases or in any case, controversy, or proceeding related to this Chapter 11 Cases, and (c) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) the waiver of any other rights, claims, actions, setoffs, or recoupments to which RTS is or may be entitled, in law or in

equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly deemed reserved.

*[Remainder of the page intentionally left blank.]*

Dated: November 24, 2025  
Dallas, Texas

Respectfully submitted,

**O'MELVENY & MYERS, LLP**

By: /s/ Laura Smith  
**O'MELVENY & MYERS LLP**  
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*Counsel to RTS Orchards, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing pleading, was served this 24th day of November, 2025 via the Court's ECF system upon all counsel of record that are registered ECF users.

/s/Laura Smith  
Laura Smith