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GRAY REED

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*Counsel to the Official Committee
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**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. ¹	§	(Jointly Administered)
	§	

**CERTIFICATE OF NO OBJECTION REGARDING
FIRST AND FINAL APPLICATION OF GRAY REED FOR
ALLOWANCE OF COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD OF JULY 10, 2025, THROUGH DECEMBER 16, 2025**

Pursuant to the *Procedures for Complex Cases in the Northern District of Texas*, the undersigned counsel for the above-captioned debtors and debtors in possession (collectively, the “Debtors”) certifies as follows:

1. On January 28, 2026, the Official Committee of Unsecured Creditors (the “Committee”) filed its *First and Final Application of Gray Reed for Allowance of*

¹ 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.



Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Official Committee of Unsecured Creditors for the Period of July 10, 2025, through December 16, 2025 [Docket No. 739] (the “Application”).

2. On the same date, the Application was served on the Master Service List via electronic mail, where available, and via U.S. First Class Mail where email is unavailable as indicated in the Application’s *Certificate of Service*.

3. The deadline for parties to file responses to the relief requested in the Application was February 23, 2026. Prior to the objection deadline, on February 11, 2026, Gray Reed received an e-mail communication from Meredyth Kippes, trial attorney for the Office of the United States Trustee, advising that the U.S. Trustee has reviewed the Application, and that any questions or concerns the U.S. Trustee may have were more than covered by Gray Reed’s voluntary reduction detailed in the Application.

4. As of the date hereof, no objections or responses to the Application have been filed on the Court’s docket, and Gray Reed is unaware of any formal or informal objections to the Application. Accordingly, Gray Reed requests that the Court enter the proposed order attached hereto as **Exhibit A** at its earliest convenience.

Respectfully submitted this 25th day of February 2026.

GRAY REED

By: /s/ Jason S. Brookner

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Certificate of Service

I certify that on February 25, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner

Exhibit A

Proposed Order

**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. ¹	§	(Jointly Administered)
	§	

**ORDER APPROVING THE
FIRST AND FINAL APPLICATION OF GRAY REED FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED AS COUNSEL
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD OF JULY 10, 2025, THROUGH DECEMBER 16, 2025**

Upon the application (the “Application”)² of Gray Reed as counsel to the Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter 11 cases of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”), (i) awarding final compensation to Gray Reed for services rendered on behalf

¹ 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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

of the Committee and expenses incurred during the Application Period; (ii) directing the Debtors or Liquidating Trustee (as defined in the Plan), as applicable, to pay the balance of fees and expenses incurred but unpaid during the Application Period; and (iii) granting such other and further relief as may be just and proper, pursuant to section 330 of the Bankruptcy Code, rule 2016(a) of the Bankruptcy Rules, rule 2016-1 of the Local Rules, and Section F of the *Procedures for Complex Cases in the Northern District of Texas*; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that notice of the Application and opportunity for a hearing were appropriate under the circumstances and no other notice need be provided; and this Court having found that the requirements of the Bankruptcy Local Rules are satisfied by the contents of the Application; and this Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, IT IS HEREBY ORDERED THAT:

1. The Application is granted as set forth herein.
2. Finding that Gray Reed's services were necessary and beneficial to the estates at the time performed and that the requested fees and expenses were reasonable and necessary, Gray Reed's compensation in the aggregate amount of \$795,732.35 in fees and \$12,512.49 in expenses is hereby approved on a final basis.

3. The Debtors or the Liquidating Trustee, as applicable, are authorized and directed to pay Gray Reed the sum of \$340,985.63, representing all unpaid fees and expenses approved in the preceding paragraph.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF ORDER

Submitted by:

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