

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

In re:

HIGHER GROUND EDUCATION, INC, *et al.*,¹

Reorganized Debtors.

Chapter 11

Case No. 25-80121 (MVL)

(Jointly Administered)

**STIPULATION AND AGREED ORDER ALLOWING, AND AUTHORIZING
PAYMENT OF, ADMINISTRATIVE EXPENSE CLAIM OF 3501 W. SEGERSTROM**

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 Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Naperville LLC (8046); 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); AltShool II LLC (0403). The Debtors' mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.



John P. Madden, in his capacity as Trustee (the “Liquidating Trustee”) of the HGE Liquidating Trust² established under the Plan and creditor 3501 W. Segerstrom LLC (the “Landlord,” and together with the Liquidating Trustee, the “Parties”), hereby stipulate and agree as follows:

A. Whereas, on June 17 and 18, 2025, the Debtors filed voluntary petitions for relief under chapter 11 of the U.S. Bankruptcy Code.

B. Whereas, the Effective Date of the Plan occurred on December 16, 2025.

C. Whereas, the Plan established January 15, 2026 as the Administrative Claims Bar Date.

D. Whereas, the Landlord and Liquidating Trustee previously agreed to extend the Administrative Claims Bar Date for the Landlord through and including March 13, 2026 [Docket No. 732] and have agreed to further extend the Administrative Claims Bar Date for the Landlord through and including April 13, 2026.

E. Whereas, pursuant to the *Second Notice of Rejection of Certain Executory Contracts and Unexpired Leases* [Docket No. 388] the Debtors rejected the Landlord’s lease after the Petition Date retroactive to June 27, 2026 (the “Rejection Date”), and the Landlord was not paid Rent (as defined by the Landlord’s lease) during the time between the Petition Date and Rejection Date in the amount of \$14,144.20 (the “Administrative Claim Amount”).

² Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the *Modified Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 649] (the “Plan”).

F. Whereas, the Parties have agreed that Landlord is entitled to allowance of an Administrative Claim and payment of the Administrative Claim Amount and stipulate and agree as set forth below:

NOW, THEREFORE, IT IS HEREBY ORDERED, STIPULATED, AND AGREED AS FOLLOWS:

1. The Landlord is entitled to allowance and payment of an Administrative Claim in the amount of \$14,144.20 and the Liquidating Trustee is authorized and directed to pay the Landlord \$14,144.20 within ten (10) business days of entry by the Court of this Stipulation and Agreed Order.

2. The Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation and Agreed Order.

###END OF ORDER###

AGREED AS TO FORM AND CONTENT:

Dated: March 13, 2026

GRAY REED

/s/Aaron M. Kaufman

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