

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

In re:

HIGHER GROUND EDUCATION, INC, *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 25-80121 (MVL)

(Jointly Administered)

**STIPULATION AND AGREED ORDER ALLOWING EXTENDING  
DEADLINE FOR 3501 W. SEGERSTROM TO FILE AN APPLICATION  
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

<sup>1</sup> 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 Trust<sup>2</sup> 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, the Parties stipulate and agree as set forth below:

[REMAINDER INTENTIONALLY BLANK]

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<sup>2</sup> 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”).

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

1. The Landlord's deadline to file its request for payment of an Administrative Expense Claim shall be extended through and including April 13, 2026.
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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