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**COUNSEL TO DEBTORS AND
DEBTORS IN POSSESSION**

**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
	§	
Debtors.	§	(Jointly Administered)

**CERTIFICATE OF NO OBJECTION REGARDING
SECOND INTERIM AND FINAL APPLICATION OF
FOLEY & LARDNER LLP FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED AS
COUNSEL TO THE DEBTORS FOR THE PERIOD FROM
JUNE 17, 2025 THROUGH DECEMBER 16, 2025**

[Related to Docket No. 735]

In accordance with the *Procedures for Complex Cases in the Northern District of Texas* (the “Complex Case Procedures”), the undersigned counsel for Higher Ground Education, Inc.

¹ The Reorganized 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); AltSchool II LLC (0403). The Debtors’ mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.

(“**HGE**”) and its affiliated debtors (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), certifies as follows:

1. On January 23, 2026, the Debtors filed the *Second Interim and Final Application of Foley & Lardner LLP for Allowance and Payment Compensation and Reimbursement of Expenses Incurred as Counsel to the Debtors for the Period from June 17, 2025, through December 16, 2025* [Docket No. 735] (the “**Application**”).

2. Upon filing, the Application was served electronically via the Court’s PACER/ECF system as set forth on the Application and the *Certificate of Service* [Docket No. 854] filed on the docket in these Chapter 11 Cases.

3. On February 12, 2026, the Debtors filed the Supplement to the *Second Interim and Final Application of Foley & Lardner LLP for Allowance and Payment Compensation and Reimbursement of Expenses Incurred as Counsel* [Docket No. 848] (the “**Supplement**”).

4. On February 18, 2026, the Debtors filed the *Certificate of Counsel Regarding Order Granting the Second Interim and Final Application of Foley & Lardner LLP for Allowance and Payment Compensation and Reimbursement of Expenses Incurred as Counsel to the Debtors for the Period from June 17, 2025, through December 16, 2025* [Docket No. 852] (the “**Certificate of Counsel**”),² which attached as Exhibit A, a Further Revised Proposed Order granting the Application.

5. The Application was served via first-class mail on February 23, 2026 as set forth in the *Certificate of Service* [Docket No. 855] (the “**Secondary Certificate of Service**”) filed on the docket in these Chapter 11 Cases.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Certificate of Counsel.

6. Pursuant to the service date indicated on the Secondary Certificate of Service, the deadline for parties to file responses or objections to the relief requested in the Application was March 16, 2026.

7. No objections to the Application were filed on the docket in these Chapter 11 Cases, nor were any other responses, formal or informal, received by the Debtors or their undersigned counsel.

8. Accordingly, pursuant to Section I.29 of the Complex Case Procedures, the Debtors respectfully request that the Court enter the form of order (the “**Further Revised Proposed Order**”), attached hereto as **Exhibit A**, without need for a hearing.

[Remainder of page intentionally left blank.]

DATED: March 17, 2026

Respectfully submitted by:

/s/ Holland N. O'Neil

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**COUNSEL TO DEBTORS AND
DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2026, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Nora J. McGuffey _____
Nora J. McGuffey

Exhibit A

Further Revised 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> , ¹	§	Case No.: 25-80121-11 (MVL)
	§	
Debtor.	§	(Jointly Administered)

**ORDER GRANTING THE SECOND INTERIM AND FINAL APPLICATION
OF FOLEY & LARDNER LLP FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED
AS COUNSEL TO THE DEBTORS FOR THE PERIOD FROM
JUNE 17, 2025 THROUGH JANUARY 31, 2026²**

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.

² Incorporates the Fee Supplement (as defined below).

Upon consideration of the *Second Interim and Final Application of Foley & Lardner LLP for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred as Counsel to the Debtors for the Period from June 17, 2025, through December 16, 2025* [Docket No. 735] (the “**Final Fee Application**”)³ filed by Foley & Lardner LLP (“**Foley**”) as counsel to Higher Ground Education, Inc. (“**HGE**”) and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), as supplemented by the *Supplement to the Second Interim and Final Application of Foley & Lardner LLP for Allowance and Payment of Compensation and Reimbursement of Expenses Incurred as Counsel to the Debtors* (the “**Fee Supplement**”) for final allowance of compensation for professional services rendered to the Debtors and for reimbursement of actual and necessary expenses incurred in connection therewith for the period commencing June 17, 2025 through and including December 16, 2025 (the “**Final Fee Period**”) and during the period from December 17, 2025 through the date hereof (the “**Supplemental Period**”). **IT IS HEREBY ORDERED THAT:**

1. The Final Fee Application is **GRANTED** as set forth herein.
2. With respect to the Final Fee Period, Foley is granted final allowance of fees in the amount of **\$1,147,314.15**⁴ and final reimbursement of expenses incurred in the amount of **\$121,904.75** for the Final Fee Period, for total allowed compensation of **\$1,269,218.90**.
3. With respect to the Supplemental Period, Foley is granted final allowance of fees in the amount of **\$16,500.00** and final reimbursement of expenses incurred in the amount of **\$500** for total allowed compensation of **\$17,000.00**.

³ Capitalized terms not defined herein shall have the meaning ascribed in the Final Fee Application.

⁴ Following discussions with the U.S. Trustee, Foley voluntarily reduced the amount of fees requested in the Final Fee Application by \$3,733.00.

4. Foley is authorized to draw down the Foley Retainer,⁵ to the extent of any outstanding and unpaid fees and expenses allowed on a final basis pursuant to this Order and shall be remitted payment in full of any additional outstanding amounts.

5. From the remainder of the Foley Retainer and upon final entry of this Order and final entry of an order granting final allowance of fees and expenses for SierraConstellation Partners LLC (“SCP”), Foley is authorized to transfer (a) \$41,000.00 to SCP in partial satisfaction of SCP’s outstanding and unpaid fees and expenses, and (b) the greater of (i) \$9,079.84 or (ii) any amounts remaining in the Foley Retainer after the aforementioned payments, to the Liquidating Trust.

6. 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###

⁵ As of the date hereof, Foley is maintaining approximately \$63,346.84 as a retainer with respect to the Debtors and these Chapter 11 Cases (the “**Foley Retainer**”).

Submitted by:

/s/ Holland N. O'Neil

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