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#### PROPOSED 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., et al., 1 Case No.: 25-80121-11 (MVL) Debtors. (Jointly Administered)

# AGENDA FOR MATTERS SCHEDULED FOR HEARING TO BE HELD ON AUGUST 8, 2025, AT 9:30 A.M.

Higher Ground Education, Inc. ("HGE") and its affiliated debtors and debtors in possession (collectively, the "Debtors"), hereby file their agenda for the hearing on Friday, August 8, 2025, at 9:30 A.M. (prevailing Central Time), before the Honorable Michelle V. Larson, U.S. Bankruptcy Judge for the Northern District of Texas (the "Hearing"). The Debtors will ask the Court to consider the following:

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.



4917-2214-6138.1

#### I. Matters to be Heard:

- A. Debtors' Application for Entry of an Order Authorizing the Employment of Foley & Lardner LLP as Counsel to the Debtors Effective as of the Petition Date [Docket No. 172; Filed on 7/14/2025]
  - i. Related Documents:
    - a. Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15].
  - ii. Response Deadline: August 7, 2025.
  - iii. <u>Responses</u>: None
  - iv. Status: This matter will go forward.
- B. Debtors' Application for Entry of an Order Authorizing the Retention and Employment of SierraConstellation Partners, LLC as Financial Advisor to the Debtors Effective as of the Petition Date [Docket No. 173; Filed on 7/14/2025]
  - i. Related Documents:
    - a. Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15]; and
    - b. Notice of Filing of Revised Proposed Order Authorizing the Retention and Employment of SierraConstellation Partners, LLC as Financial Advisor to the Debtors, Effective as of the Petition Date [Docket No. 297].
  - ii. Response Deadline: August 7, 2025.
  - iii. Responses: None
  - iv. Status: This matter will go forward.
- C. Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 174; Filed on 7/14/2025]
  - i. Related Documents:
    - a. Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15]; and
    - b. Notice of Filing of Revised Proposed Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 291].

- ii. Response Deadline: August 7, 2025.
- iii. Responses: None
- iv. <u>Status</u>: This matter will go forward.

#### II. Witness and Exhibits Lists:

- A. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearings Scheduled on August 8, 2025 [Docket No. 295];
- B. Debtors' Witness and Exhibit List for August 8, 2025 Hearing [Docket No. 296]; and
- C. Debtors' Amended Witness and Exhibit List for August 8, 2025 Hearing [Docket No. 298];

### **III.** Notices of Hearing:

A. Third Amended Notice of Hearing [Docket No. 289].

#### **IV.** Certificates of Service:

A. Certificate of Service re: Docket Nos. 172, 173, 174 [Docket No. 188].

DATED: August 7, 2025 Respectfully submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700) Thomas C. Scannell (TX 24070559)

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Case 25-80121-mvl11 Doc 302 Filed 08/07/25 Entered 08/07/25 15:44:09 Desc Main Document Page 5 of 5

# **CERTIFICATE OF SERVICE**

I hereby certify that on August 7, 2025, 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