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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:

Higher Ground Education, Inc., et al., 1

Debtors.

S
Chapter 11

S
Case No.: 25-80121-11 (MVL)

S
(Jointly Administered)

AGENDA FOR MATTERS SCHEDULED FOR HEARING TO BE HELD ON SEPTEMBER 11, 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 <u>Thursday</u>, <u>September 11, 2025, at 9:30 A.M. (prevailing Central Time)</u>, 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.



I. Matter to be Heard:

- A. Emergency Motion to Continue Hearing on the Debtors' Motion for Entry of an Order (A) Authorizing the Distribution of Cash Receipts to Guidepost Globel Education, Inc. and (B) Granting Related Relief [Docket No. 428 Filed on 9/9/2025]
 - i. Related Documents: None
 - ii. Response Deadline: Prior to the Hearing
 - iii. Responses: None
 - iv. Status: This matter will go forward.
- B. Debtors' Motion for Entry of an Order (A) Authorizing the Distribution of Cash Receipts to Guidepost Globel Education, Inc. and (B) Granting Related Relief [Docket No. 304; Filed on 7/24/2025]
 - i. Related Documents:
 - a. Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15]; and
 - b. Declaration of Jonathan McCarthy in Support of Debtors' Motion for Entry of an Order (A) Authorizing the Distribution of Cash Receipts to Guidepost Globel Education, Inc. and (B) Granting Related Relief [Docket No. 432].
 - ii. Response Deadline: N/A.
 - iii. <u>Responses</u>:
 - a. The Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights to the Debtors' Motion for Entry of an Order (A) Authorizing the Distribution of Cash Receipts to Guidepost Globel Education, Inc. and (B) Granting Related Relief [Docket No. 344]; and
 - b. Guidepost Financial Partner, LLC's Statement of Position Regarding (I) Distribution Motion and (II) Leases Motion [Docket No. 396].
 - iv. <u>Status</u>: This matter will go forward pending resolution of the Committee's Motion to Continue.

II. Witness and Exhibits Lists:

- A. Witness and Exhibit List [Docket No. 423], filed by Landlord, 214 E Hallandale Beach LLC;
- B. Debtors' Witness and Exhibit List for September 11, 2025 Hearing [Docket No. 424];
- C. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearings Scheduled on September 11, 2025 [Docket No. 425]; and
- D. Debtors' Amended Witness and Exhibit List for September 11, 2025 Hearing [Docket No. 433];

III. Notices of Hearing:

- A. *Amended Notice of Hearing* [Docket No. 417];
- B. Second Amended Notice of Hearing [Docket No. 427]; and
- C. Notice of Hearing on the Committee's Motion to Continue Hearing on the Debtors' Motion for Entry of an Order Authorizing the Distribution of Cash Receipts [Docket No. 430].

IV. <u>Certificates of Service</u>:

- A. Certificate of Service re: Docket No. 304 [Docket No. 318]; and
- B. *Certificate of Service* re: Docket Nos. 401, 402 [Docket No. 407].

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DATED: September 10, 2025 Respectfully submitted by:

/s/ Holland N. O'Neil

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COUNSEL TO DEBTORS AND DEBTORS IN POSSESSION Case 25-80121-mvl11 Doc 434 Filed 09/10/25 Entered 09/10/25 15:23:33 Desc Main Document Page 5 of 5

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 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