

Holland N. O'Neil (TX 14864700)  
Thomas C. Scannell (TX 24070559)  
**FOLEY & LARDNER LLP**  
2021 McKinney Avenue, Suite 1600  
Dallas, TX 75201  
Telephone: (214) 999-3000  
Facsimile: (214) 999-4667  
honeil@foley.com  
tscannell@foley.com

Timothy C. Mohan  
(admitted *pro hac vice*)  
**FOLEY & LARDNER LLP**  
1144 15th Street, Suite 2200  
Denver, CO 80202  
Telephone: (720) 437-2000  
Facsimile: (720) 437-2200  
tmohan@foley.com

Nora J. McGuffey (TX 24121000)  
Quynh-Nhu Truong (TX 24137253)  
**FOLEY & LARDNER LLP**  
1000 Louisiana Street, Suite 2000  
Houston, TX 77002  
Telephone: (713) 276-5500  
Facsimile: (713) 276-5555  
nora.mcguffey@foley.com  
qtruong@foley.com

**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> , <sup>1</sup>	§	Case No.: 25-80121-11 (MVL)
	§	
Debtors.	§	(Jointly Administered)

---

**AMENDED AGENDA FOR MATTERS SCHEDULED FOR  
HEARING TO BE HELD ON SEPTEMBER 25, 2025, AT 1:30 P.M.**

---

Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby file their amended agenda for the hearing on **Thursday, September 25, 2025, at 1:30 P.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:

---

<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 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. *Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Unexpired Leases, and (II) Granting Related Relief [Docket No. 99 Filed on 6/27/2025]***

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15]; and*
- b. *Certificate of Counsel Regarding Debtors' Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [Docket No. 504].*

ii. Response Deadline: September 18, 2025 at 5:00 p.m. (prevailing Central Time).

iii. Responses:

- a. *Guidepost Financial Partner, LLC's Statement of Position Regarding (I) Distribution Motion and (II) Leases Motion [Docket No. 396]; and*
- b. *The Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights to the Debtors' Motions Scheduled for Hearing on August 29, 2025, and (B) Granting Related Relief [Docket No. 400].*

iv. Status: This matter will go forward. The Debtors have resolved the objections and informal comments received in relation to the original proposed order and have filed a Certificate of Counsel with a revised proposed order attached.

**B. *Debtors' Second Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [Docket No. 263; Filed on 7/24/2025]***

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions [Docket No. 15]; and*
- b. *Certificate of Counsel Regarding Debtors' Second Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (II) Granting Related Relief [Docket No. 502].*

- ii. Response Deadline: September 18, 2025 at 5:00 p.m. (prevailing Central Time).
- iii. Responses:
  - a. *The Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights to the Debtors' Motions Scheduled for Hearing on August 29, 2025, and (B) Granting Related Relief* [Docket No. 400].
- iv. Status: This matter will go forward. The Debtors have resolved the objections and informal comments received in relation to the original proposed order and have filed a Certificate of Counsel with a revised proposed order attached.

**C. *Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Unexpired Leases, and (II) Granting Related Relief* [Docket No. 313; Filed on 8/8/2025]**

- i. Related Documents:
  - a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15]; and
  - a. *Certificate of Counsel Regarding Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (II) Granting Related Relief* [Docket No. 503].
- ii. Response Deadline: September 18, 2025 at 5:00 p.m. (prevailing Central Time).
- iii. Responses:
  - a. *The Official Committee of Unsecured Creditors' Limited Objection and Reservation of Rights to the Debtors' Motions Scheduled for Hearing on August 29, 2025, and (B) Granting Related Relief* [Docket No. 400].
- iv. Status: This matter will go forward. The Debtors have resolved the objections and informal comments received in relation to the original proposed order and have filed a Certificate of Counsel with a revised proposed order attached.

**D. *Stipulation and Agreed Order Granting the Committee Derivative Standing to Send Settlement Demand* [Docket No. 443; Filed on 9/12/2025]**

- i. Related Documents: None
- ii. Response Deadline: N/A
- iii. Responses: Informal comments received from parties in interest.
- iv. Status: This matter will go forward. The Debtors and Committee have resolved the informal comments received in relation to the original proposed order.

**II. Witness and Exhibits Lists:**

- A. *The Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled on September 25, 2025* [Docket No. 459];
- B. *Debtors' Witness and Exhibit List for September 25, 2025 Hearing* [Docket No. 497]; and
- C. *Debtors' Amended Witness and Exhibit List for September 25, 2025 Hearing* [Docket No. 505]

**III. Notices of Hearing:**

- A. *Notice of (I) Adjournment of Certain Matters Set for September 11, 2025 Hearing, and (II) Continued Hearing on September 24, 2025* [Docket No. 426];
- B. *Notice of Adjourned and Continued Hearing* [ [Docket No. 446];
- C. *Amended Notice of Hearing* [Docket No. 457]; and
- D. *Notice of Hearing* [Docket No. 496].

**IV. Certificates of Service:**

- A. *Certificate of Service* re: Docket Nos. 93, 98, 99 [Docket No. 110].
- B. *Certificate of Service* re: Docket Nos. 261, 262, 263 [Docket No. 283].
- C. *Certificate of Service* re: Docket Nos. 311, 312, 313, 314, 315, 316 [Docket No. 339].

*[Remainder of Page Intentionally Left Blank]*

DATED: September 25, 2025

Respectfully submitted by:

/s/ Holland N. O'Neil

Holland N. O'Neil (TX 14864700)  
Thomas C. Scannell (TX 24070559)  
**FOLEY & LARDNER LLP**  
2021 McKinney Avenue, Suite 1600  
Dallas, TX 75201  
Telephone: (214) 999-3000  
Facsimile: (214) 999-4667  
honeil@foley.com  
tscannell@foley.com

-and-

Timothy C. Mohan (admitted *pro hac vice*)  
**FOLEY & LARDNER LLP**  
1144 15th Street, Suite 2200  
Denver, CO 80202  
Telephone: (720) 437-2000  
Facsimile: (720) 437-2200  
tmohan@foley.com

-and-

Nora J. McGuffey (TX 24121000)  
Quynh-Nhu Truong (TX 24137253)  
**FOLEY & LARDNER LLP**  
1000 Louisiana Street, Suite 2000  
Houston, TX 77002  
Telephone: (713) 276-5500  
Facsimile: (713) 276-5555  
nora.mcguffey@foley.com  
qtruong@foley.com

**COUNSEL TO DEBTORS  
AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 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