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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**

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In re:	§	
	§	Chapter 11
	§	
Higher Ground Education, Inc., <i>et al.</i> , <sup>1</sup>	§	Case No.: 25-80121-11 (MVL)
	§	
Debtors.	§	(Jointly Administered)

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**AGENDA FOR MATTERS SCHEDULED FOR  
COMBINED HEARING TO BE HELD ON NOVEMBER 24 2025, AT 1:30 P.M.**

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Higher Ground Education, Inc. (“HGE”) and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby file their agenda for the combined hearing on **Monday, November 24, 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 “**Combined Hearing**”). The Debtors will ask the Court to consider the following:

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<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. *Modified Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 649; Filed on 11/20/2025]**

**i. Related Documents:**

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Affiliated Debtors* [Docket No. 94];
- c. *Notice of Filing of First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 527];
- d. *First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 528];
- e. *Notice of Filing of Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 548];
- f. *Order (I) Conditionally Approving the Disclosure Statement; (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing; (III) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures; (IV) Approving the Solicitation and Notice Procedures; and (V) Granting Related Relief* [Docket No. 568];
- g. *Notice of Publication re: Combined Notice* [Docket No. 623];
- h. *Notice of Filing of Initial Plan Supplement* [Docket No. 631];
- i. *Notice of Filing of Amended Plan Supplement* [Docket No. 634];
- j. *Notice of Burkes School, LLC and Naples School, LLC Election to Opt Out of Third-Party Releases* [Docket No. 639];
- k. *Declaration of Terry Nugent in Support of 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. 644];

- l. *Notice of Filing of Proposed Order (I) Approving the Debtors' Disclosure Statement and (II) Confirming 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. 650];
  - m. *Declaration of Adam J. Gorman With Respect to the Tabulation of Votes on the Modified Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 652];
  - n. *Declaration of Sean Corwen in Support of Confirmation of 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. 653];
  - o. *Notice of Filing of Second Amended Plan Supplement* [Docket No. 654];
  - p. *Declaration of Marc Kirshbaum in Support of (I) Final Approval of the Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors; and (II) Confirmation of the Modified Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 655]; and
  - q. *Debtors' Memorandum of Law in Support of (I) Final Approval of the Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors; and (II) Confirmation of the Modified Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 656].
- ii. Response Deadlines: (a) November 17, 2025 at 5:00 p.m. (prevailing Central Time), (b) November 18, 2025 at 12:00 p.m. (prevailing Central Time) for U.S. Trustee, and (c) November 19, 2025 at 12:00 p.m. (prevailing Central Time) for FIC-I Investors Claimants and 214 E Hallandale Beach LLC.

iii. Responses:

- a. *Tennessee Department of Revenue's Objection to Confirmation of Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 630];
- b. *United States Trustee's Objection to (I) Final Approval of the Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors; and (II) Confirmation of Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 640];
- c. *Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora's Objection to Confirmation of the Second Amended Joint Plan of Reorganization and to Final Approval of the Second Amended Disclosure Statement* [Docket No. 642]; and
  - (i) *Notice of Withdrawal of Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora's Objection to Confirmation of the Second Amended Joint Plan of Reorganization and to Final Approval of the Second Amended Disclosure Statement* [Docket No. 651]
- d. *214 E Halladale Beach LLC's Objection to Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 643].

iv. Status: This matter will go forward.

**B. *Second Amended Disclosure Statement for the Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 551; Filed on 10/13/2025]**

i. Related Documents:

- a. *Declaration of Jonathan McCarthy in Support of First Day Motions* [Docket No. 15];
- b. *Disclosure Statement for the Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Affiliated Debtors* [Docket No. 97];

- c. *Notice of Filing of First Amended Disclosure for the First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 529];
- d. *First Amended Disclosure for the First Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 530];
- e. *Notice of Filing of Second Amended Disclosure for the Second Amended Plan Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 550];
- f. *Order (I) Conditionally Approving the Disclosure Statement; (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing; (III) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures; (IV) Approving the Solicitation and Notice Procedures; and (V) Granting Related Relief* [Docket No. 568];
- g. *Notice of Filing of Proposed Order (I) Approving the Debtors' Disclosure Statement and (II) Confirming 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. 650];
- h. *Declaration of Marc Kirshbaum in Support of (I) Final Approval of the Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors; and (II) Confirmation of the Modified Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 655]; and
- i. *Debtors' Memorandum of Law in Support of (I) Final Approval of the Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors; and (II) Confirmation of the Modified Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 656].

- ii. Response Deadlines: (a) November 17, 2025 at 5:00 p.m. (prevailing Central Time), (b) November 18, 2025 at 12:00 p.m. (prevailing Central Time) for U.S. Trustee, and (c) November 19, 2025 at 12:00 p.m. (prevailing Central Time) for FIC-I Investors Claimants and 214 E Hallandale Beach LLC.
- iii. Responses:
  - a. *Objection to: (A) Disclosure Statement for the Joint Plan of Reorganization of Higher Ground Education, Inc. and Its Affiliated Debtors; and (B) the Debtors' Motion for Entry of an Order (I) Conditionally Approving the Disclosure Statement; (II) Scheduling a Combined Disclosure Statement Approval and Plan Confirmation Hearing; (III) Establishing a Plan and Disclosure Statement Objection Deadline and Related Procedures; (IV) Approving the Solicitation and Notice Procedures; and (V) Granting Related Relief* [Docket No. 169];
    - (i) *Notice of Withdrawal of Disclosure Statement Objection* [Docket No. 169] [Docket No. 538].
  - b. *Objection of Carl Barney to Disclosure Statement* [Docket No. 285]; and
    - (i) *Notice of Withdrawal of Disclosure Statement Objection* [Docket No. 547]
  - c. *Objection to Debtors' First Amended Disclosure Statement* [Docket No. 545].
    - (i) *Notice of Withdrawal and Reservation of Rights* [Docket No. 561].
  - d. *United States Trustee's Objection to (I) Final Approval of the Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors; and (II) Confirmation of Second Amended Disclosure Statement for the Second Amended Joint Plan of Reorganization of Higher Ground Education, Inc., Its Affiliated Debtors, and the Official Committee of Unsecured Creditors* [Docket No. 640]; and
  - e. *Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora's Objection to Confirmation of the Second Amended Joint Plan of Reorganization and to Final Approval of the Second Amended Disclosure Statement* [Docket No. 642].

- (i) *Notice of Withdrawal of Duc Viet Nguyen, Thuy Thi Thu Nguyen, and Dixit Kishorkumar Vora's Objection to Confirmation of the Second Amended Joint Plan of Reorganization and to Final Approval of the Second Amended Disclosure Statement* [Docket No. 651].

iv. Status: This matter will go forward.

**II. Witness and Exhibits Lists:**

- A. *The Official Committee of Unsecured Creditors' Witness and Exhibit List for the Hearing Scheduled on November 24, 2025* [Docket No. 645];
- B. *Debtors' Witness and Exhibit List for November 24, 2025 Hearing* [Docket No. 646];
- C. *Witness and Exhibit List* (filed by 214 E Hallandale Beach LLC) [Docket No. 647]; and
- D. *Debtors' Amended Witness and Exhibit List for November 24, 2025 Hearing* [Docket No. 657].

**III. Notices of Hearing:**

- A. Docket Entry: Confirmation and Disclosure Statement hearing set [Docket No. 569]; and
- B. *Notice of Publication* re: Combined Notice [Docket No. 623].

**IV. Certificates of Service:**

- A. *Certificate of Service* re: Docket Nos. 548, 549, 550, 551, 552, 554, 558, 559 [Docket No. 573];
- B. *Certificate of Service* re: Solicitation Materials [Docket No. 619]; and
- C. *Supplemental Certificate of Service* re: Solicitation Materials [Docket No. 636].

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DATED: November 21, 2025

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 November 21, 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