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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	Chapter 11
HIGHER GROUND EDUCATION, INC.,[1]	§	Case No. 25-80121 (MVL)
Reorganized Debtor.	§	

THE LIQUIDATING TRUSTEE'S
MOTION FOR ENTRY OF AN ORDER EXTENDING
THE PERIOD TO FILE AND SERVE OBJECTIONS TO CLAIMS

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT HTTPS://ECF.TXNB.USCOURTS.GOV/ NO MORE THAN TWENTY-FOUR (24) DAYS AFTER THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK AND FILED ON THE DOCKET NO MORE THAN TWENTY-FOUR (24) DAYS AFTER THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

[1] The last four digits of the Reorganized Debtor's federal tax identification number are 7265. A complete list of each of the Reorganized Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of the Reorganized Debtor's claims and noticing agent at https://www.veritaglobal.net/higherground.

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John P. Madden, in his capacity as Trustee of the HGE Liquidating Trust (the "Liquidating Trustee"), respectfully states the following in support of this motion (the "Motion"):[2]

Relief Requested

1. The Liquidating Trustee seeks entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Order") pursuant to rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"): (a) extending the time to file objections to claims (the "Claims Objection Deadline") for 90 additional days, from June 15, 2026, through and including Monday, September 14, 2026; and (b) granting related relief.

Jurisdiction and Venue

2. This court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, and this is a core matter pursuant to 28 U.S.C. § 157(b).

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The statutory bases for the relief requested herein are sections 105(a) and 502(b) of title 11 of the United States Code (the "Bankruptcy Code") and Bankruptcy Rule 9006(b).

Background

5. On June 17, 2025 and June 18, 2025 (collectively, the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. During these chapter 11 cases, the Debtors operated their businesses and managed their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. Soon after the Petition Date, the Court entered an order authorizing the Debtors to appoint Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita") as claims and noticing

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Plan and Confirmation Order (as defined below).

agent in these chapter 11 cases [Docket No. 58] to, among other things, serve as the authorized repository for all proofs of claim filed in the cases and maintain the official claims register for the Debtors (the "Claims Register").

7. On July 8, 2025, the United States Trustee for the Northern District of Texas (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Committee"). *See* Docket No. 158. No request for the appointment of a trustee or examiner was made in these chapter 11 cases.

8. On November 20, 2025, the Debtors and the Committee filed 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. 649] (the "Plan"). On November 26, 2025, the Court entered its *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. 707] (the "Confirmation Order"). The Effective Date of the Plan occurred on December 16, 2025. *See* Docket No. 721. On the Effective Date, under the terms of the Plan and corresponding Liquidating Trust Agreement [Docket No. 631-5], John P. Madden became the Liquidating Trustee.

The Claims Reconciliation Process

9. The general deadline for filing proofs of claim was August 7, 2025 (the "Claims Bar Date"). *See* Docket No. 57. The deadline for a governmental unit for filing proofs of claim was December 15, 2025. *Id.*

10. The Plan provides for the creation of the HGE Liquidating Trust for the purpose of, among other things, liquidating and distributing Estate assets that were contributed to the HGE

Liquidating Trust in accordance with the Plan, implementing the Plan, and winding down the Debtors. *See* Plan, arts. 4.3, 4.18. As of the Effective Date, the HGE Liquidating Trust, acting by and through the Liquidating Trustee, is the Estates' representative with respect to the Liquidating Trust Assets. *See id.*

11. In addition, the Plan provides for the consolidation of the Debtors' Estates for purposes of distributing assets to the Estates' creditors. *See* Plan, art. 4.17. Under the Plan, the Liquidating Trustee has both the authority and the responsibility to file objections to proofs of claim on or before the Claims Objection Deadline, and to settle, compromise, withdraw, or litigate to judgment objections to any and all Claims, regardless of whether classified or otherwise. *See* Plan, art. 8.1.

12. As of the Effective Date, approximately 651 proofs of claim have been filed against the Debtors, totaling $774,867,068.00 million in the aggregate. The Liquidating Trustee and his advisors have been working diligently to review the Claims Register and reconcile scheduled claims and filed proofs of claims (collectively, the "Claims") against the Debtors in these chapter 11 cases. Additionally, the Liquidating Trustee has been pursuing Estate causes of action which were reserved under the Plan as Liquidation Trust Assets. Since the Effective Date, the Liquidating Trustee has successfully settled on the largest of these causes of action and has since turned to the pursuit of avoidance actions on behalf of the Estates. The resolution of the Liquidating Trustee's pursuit of these causes of action will allow the Liquidating Trustee to solidify his strategy for making objections to or otherwise resolving those claims that remain on the Claims Register (the "Remaining Claims").

13. In light of the foregoing, the Liquidating Trustee requires more time to complete the claims administration process necessary to make distributions and close these cases.

Basis for Relief

14. Pursuant to Article 8.1 of the Plan, the Liquidation Trustee is required to file objections to Claims on or before the Claims Objection Deadline, which is defined as "the date which is 180 days following the Effective Date[.]" Plan, art. 1.1.23. Accordingly, because the Effective Date was on December 16, 2025, the Liquidation Trustee is required to file objections to Claims by June 15, 2026, absent an extension of such deadline. The Plan also provides that the Court may extend the Claims Objection Deadline. *See* Plan, art. 1.1.23. The Liquidation Trustee seeks an extension of the Claims Objection Deadline to avoid unnecessary expense to the Estates.

15. Pursuant to Bankruptcy Rule 9006(b)(1), when the Bankruptcy Rules, a notice given under the Bankruptcy Rules, or a court order "requires or allows an act to be performed at or within a specified period … the court may – at any time and for cause – extend the time to act if with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires…" Given the circumstances, the Liquidating Trustee respectfully submits that cause exists to extend the Claims Objection Deadline through and including September 14, 2026, which will not have a materially adverse impact on creditors or other judicial proceedings.

16. As mentioned above, the Claims Register reflects approximately 649 proofs of claim have been filed against the Debtors, totaling over $774 million in the aggregate. Approximately 477 of these claims are general unsecured creditors, amounting to $534,420,672.00 of the overall claims pool. 220 of the claims that were filed assert secured, administrative, or priority status, amounting to approximately $240,446,396.00. The Liquidating Trustee and his advisors have been working diligently to review, analyze, and resolve these claims and, in many cases, have been able to resolve or satisfy them. However, the resolution of such a significant

amount of claims is a lengthy and time-consuming process. Additionally, the Liquidating Trustee is currently pursuing avoidance actions, and until that process is completed, he will be unable to solidify the amount of funds available for distribution in order to satisfy those Remaining Claims which should be allowed.

17. Rather than haphazardly object to the Remaining Claims merely to satisfy the original Claims Objection Deadline, the Liquidating Trustee believes it is in the best interests of the Estates to continue his diligent review and reconciliation process, as well as his pursuit of the avoidance actions. The Liquidating Trustee has acted in good faith throughout this process and respectfully submits that the need for an extension is justified in the circumstances.

18. Similar relief has been granted by courts in this district. *See, e.g., In re Ebix US, LLC*, No. 23-80003 (SWE) [Docket No. 178] (Bankr. N.D. Tex. Sept. 22, 2025) (extending the objection deadline by 121 days); *In re Eye Care Leaders Portfolio Holdings, LLC*, No. 24-80001 (MVL) [Docket No. 904] (Bankr. N.D. Tex. Apr. 30, 2025) (extending the objection deadline by 180 days); *In re Eiger Biopharmaceuticals, Inc.*, No. 24-80040 (SGJ) [Docket No. 746] (Bankr. N.D. Tex. Dec. 4, 2024) (extending the objection deadline by 182 days); *In re Impel Pharmaceuticals Inc.*, No. 23-80016 (SGJ) [Docket No. 381] (Bankr. N.D. Tex. Jun. 3, 2024) (extending the objection deadline by 120 days).

19. Pursuant to the Plan, the Court has express authority to extend the Claims Objection Deadline. Further, "[t]he federal courts are vested with inherent power 'to manage their own affairs so as to achieve the orderly and expeditious disposition of cases[,]' ... includ[ing] the power of the court to control its docket[.]" *United States v. Colomb*, 419 F.3d 292, 299 (5th Cir. 2005) (quoting *Woodson v. Surgitek, Inc.*, 57 F.3d 1406, 1417 (5th Cir. 1995)).

20. Accordingly, the Liquidating Trustee respectfully submits that an extension of the Claims Objection Deadline through and including September 14, 2026, is appropriate.

Notice

21. The Liquidating Trustee will provide notice of this motion to the following parties or their respective counsel: (a) Reorganized HGE; (b) the Office of the United States Trustee for the Northern District of Texas; (c) the holders of the thirty (30) largest unsecured claims against the Debtors (on a consolidated basis); (d) the United States Attorney's Office for the Northern District of Texas; (e) the Internal Revenue Service; (f) the state attorneys general for the states in which the Debtors operated; and (g) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Liquidating Trustee respectfully submits that, in light of the nature of the relief requested, no other or further notice need be given.

[*Remainder of page intentionally left blank*]

WHEREFORE, the Liquidating Trustee respectfully requests (a) entry of the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and (b) granting such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted this 8th day of May 2026.

GRAY REED

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Certificate of Service

I certify that on May 8, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas and on the parties appearing on the attached service list via electronic mail, where available, and via U.S. First Class Mail where email is unavailable.

/s/ Jason S. Brookner
Jason S. Brookner

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Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	Chapter 11
HIGHER GROUND EDUCATION, INC.,[1]	§	Case No. 25-80121 (MVL)
Reorganized Debtor.	§	

ORDER GRANTING LIQUIDATING TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE PERIOD TO FILE AND SERVE OBJECTIONS TO CLAIMS

Upon the motion (the "Motion")[2] of John P. Madden, in his capacity as Trustee of the HGE Liquidating Trust (the "Liquidating Trustee"), for entry of an order (this "Order") pursuant to rule 9006(b) of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"): (a) extending the time to file objections to claims (the "Claims Objection Deadline") for 90 additional days, from June 15, 2026, through and including Monday, September 14, 2026; and (b) granting related relief;

[1] The last four digits of the Reorganized Debtor's federal tax identification number are 7265. A complete list of each of the Reorganized Debtors whose claims are being administered in this chapter 11 case may be obtained on the website of the Reorganized Debtor's claims and noticing agent at https://www.veritaglobal.net/higherground.

[2] Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157 (b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is permissible pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interest of the Estates; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Claims Objection Deadline is extended through and including September 14, 2026.

2. Verita, as claims, noticing and solicitation agent for the Debtors, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Notwithstanding anything to the contrary in the Bankruptcy Code, Bankruptcy Rules or Local Rules, this Order shall be immediately effective and enforceable upon entry.

4. 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

Submitted by:

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