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COUNSEL TO GUIDEPOST GLOBAL EDUCATION, INC.

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. 25-80121-11 (MVL)
Reorganized Debtor.	§	

GUIDEPOST GLOBAL EDUCATION, INC.'S MOTION FOR EMERGENCY HEARING ON EMERGENCY MOTION TO ENFORCE THE PLAN OF REORGANIZATION AGAINST CALIFORNIA PLAINTIFFS

TO THE HONORABLE MICHELLE V. LARSON,
UNITED STATES BANKRUPTCY JUDGE:

Guidepost Global Education, Inc. ("GGE") respectfully files this *Motion for Emergency Hearing* (the "Motion") on its *Emergency Motion to Enforce the Plan of Reorganization Against California Plaintiffs* (ECF No. 916) (the "Underlying Motion[2]"):

1. As stated in the Underlying Motion, Carl Barney, both individually and as Trustee of the Carl Barney Living Trust (collectively "Barney"), despite being an active participant in this case and therefore aware of the Plan Injunction, filed the California Complaint after confirmation

[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 Debtors' claims and noticing agent at https://www.veritasglobal.net/higherground.

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

of the Plan. GGE and Barney initially agreed to an extension of the time for GGE to respond to the California Complaint, but the extended deadline will expire this week. Absent further agreement between the parties, GGE will be forced to expend time and resources filing an answer to the California Complaint. While filing an answer may be unavoidable at this point, GGE is seeking an emergency setting in this Court to stop any further time and expense related to the proceeding in California.

2. Accordingly, GGE requests that the Court set a hearing the Underlying Motion on an emergency basis during the week of August 3, 2026. Counsel for GGE is available at any time during that week, with the exception of August 6, 2026. GGE estimates a hearing on the Underlying Motion will take approximately one hour total.

Dated: July 23, 2026

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By: */s/ Jason Binford*
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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on July 22, 2026, he contacted counsel for Barney regarding an emergency setting of the Underlying Motion. On July 23, 2026, prior to the filing of this Motion, counsel for Barney responded via email and advised that Barney would like the opportunity to respond to the expedited setting of the Underlying Motion.

/s/ Jason Binford
Jason Binford

CERTIFICATE OF SERVICE

I certify that on July 23, 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 below and on the attached service list via electronic mail, where available, and U.S. First Class Mail where email is unavailable.

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