Docket #0926 Date Filed: 08/31/2026

THRESHOLD FACTS

What is Not in Dispute

Was Barney Actively Involved in the Debtors Chapter 11 Case?	YES
Did Barney Release the Debtors?	NO
Did Barney Release GGE?	NO
Were Assets Transferred to GGE via the Confirmed Plan?	YES
Did Barney Assert a $30 million claim against the Debtors via a Proof of Claim that attaches as support the 2021 Third Amended Complaint?	YES

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The Plan Injunction

No Person or Entity may commence or pursue a Claim or Cause of Action, as applicable, of any kind against the Debtors, Reorganized HGE, the Exculpated Parties, the 1125(e) Exculpation Parties, or the Released Parties, as applicable, that relates to or is reasonably likely to relate to any act or omission in connection with, relating to, or arising out of a Claim or Cause of Action, as applicable, subject to Article 10.2, Article 10.3, Article 10.4, and Article 10.5 hereof, without the Bankruptcy Court (a) first determining, after notice and a hearing, that such Claim or Cause of Action, as applicable, represents a colorable Claim of any kind, and (b) specifically authorizing such Person or Entity to bring such Claim or Cause of Action, as applicable, against any such Debtor, Reorganized HGE, Exculpated Party, 1125(e) Exculpation Party, or Released Party, as applicable. The Bankruptcy Court will have sole and exclusive jurisdiction to adjudicate the underlying colorable Claim or Causes of Action.

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Who Was Obligated to Seek Relief From this Court?

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PLAN REQUIREMENT

Who Was Obligated to Seek Relief From This Court?

BARNEY

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"Relates to or is Reasonably Likely to Relate to"

Two Complaints, One Set of Facts

The 2026 action rests on the same alleged taking of LEI's schools, executives, and information pleaded against HGE in 2021.



OVERVIEW

The Two Pleadings

THE 2021 ACTION

Third Amended Complaint

PLAINTIFF Barney

DEFENDANTS Pieter, the LePorts, the Girn Defendants, HGE

FACTUAL ALLEGATIONS

The defendants stole LEI assets (schools, assets, executives, and information) and facilitated the transfer of those assets to HGE.

THE 2026 ACTION

Complaint

PLAINTIFF Barney

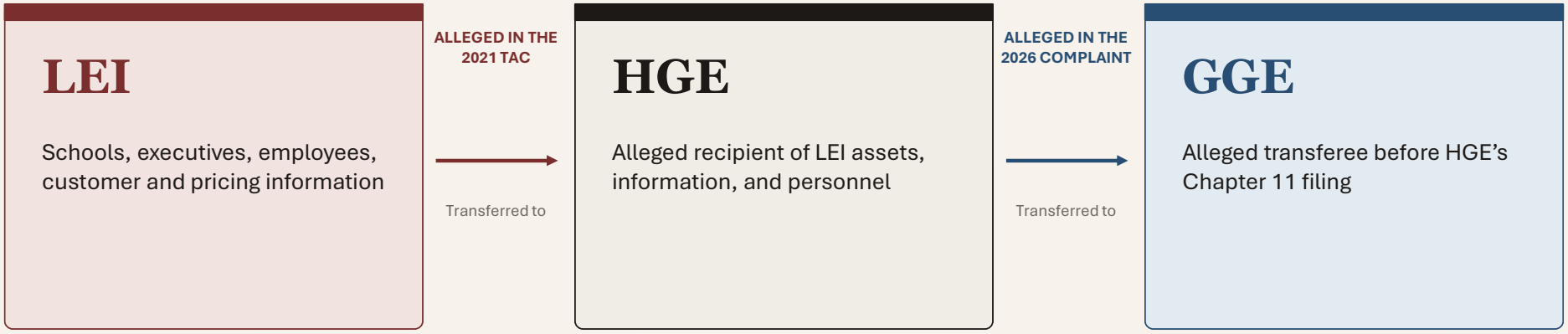
DEFENDANTS Learn Capital, GGE, Mauro, Hutter

FACTUAL ALLEGATIONS

The defendants stole LEI assets (schools, assets, executives, and information) and facilitated the transfer of those assets to HGE, then later facilitated the transfer of those assets to GGE.

THE PLEADED CHAIN

One Set of Assets, Followed Twice



Each complaint traces the same property. The 2026 pleading adds a later transfer of the same assets to GGE.

COMPARISON

The Same Operative Facts

FACT	2021 TAC	2026 COMPLAINT
Property at issue	LEI schools, assets, information, executives, and other capital	LEI schools, assets, information, executives, and other capital
Owner alleged	LEI	LEI
Conduct alleged	Departure of the Girns with LEI assets, information, and executives to HGE	Departure of the Girns with LEI assets, information, and executives to HGE; then HGE to GGE
Central actors	Ray Girn	Ray Girn and the newly added defendants
Recipient entity	HGE	HGE, then later GGE

COMPARISON

The Counts, Side by Side

2021 THIRD AMENDED COMPLAINT	2026 COMPLAINT
1 · Breach of Contract and Implied Covenant	1 · Civil RICO, 18 U.S.C. § 1962
2 · Breach of Fiduciary Duty and Aiding and Abetting	2 · Actual Intent to Defraud a Creditor, Civ. Code § 3439.01(a)(1)
3 · Misappropriation of Trade Secrets	3 · Constructive Fraudulent Transfer, Civ. Code § 3439.05
4 · Conversion	**4 · Conversion**
5 · Tortious Interference with Contractual Relations	5 · Receiving and Withholding Stolen Property, Penal Code § 496
6 · Intentional Interference with Prospective Economic Advantage	6 · Unfair Business Practices, Bus. & Prof. Code § 17200

Conversion is pleaded in both. The remaining counts are different, but they merely apply new legal labels to the same alleged facts.

COUNT FOUR, BOTH PLEADINGS

Conversion, Pleaded Twice

2021 TAC, COUNT 4

WHO

Against Lukas Pieter and the Girn Defendants, including HGE.

PROPERTY ALLEGED

Property alleged: LEI trade secrets and other confidential or proprietary information copied from LEI systems.

2026 COMPLAINT, COUNT 4

WHO

Against Learn Capital, GGE, Mauro, Hutter, and Does 1–100.

PROPERTY ALLEGED

Property alleged: LEI schools, assets, information, executives, and other capital — transferred first to HGE, then to GGE.

PARTIES

The Same Cast, Relabeled

PARTY	ROLE IN 2021	ROLE IN 2026
LEI	Derivative Plaintiff	Derivative Plaintiff
Peter LePort	Mismanagement of LEI allowed for assets to be transferred to HGE.	Mismanagement of LEI allowed for assets to be transferred to HGE.
Ray Girn	Defendant. Facilitated transfer of assets from LEI to HGE.	Conspired with other defendants to facilitate transfer of assets from LEI to HGE, then GGE.
HGE	Defendant. Allegedly received LEI assets.	Conspired with other defendants to receive LEI assets and transfer to GGE.
GGE	Not a party	Defendant; alleged recipient of transferred assets alleged RICO enterprise

SUMMARY

What Changed, What Did Not

CHANGED

- **The named defendants — from the Girns and HGE to Learn Capital and GGE**
- **The legal theories — from trade secrets and fiduciary duty to RICO and fraudulent transfer**

UNCHANGED

- **The wrongful acts and the assets taken from LEI - LEI's schools, executives, and proprietary information**