Docket #0936 Date Filed: 09/10/2026

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

FILED
SEP 10 2026
CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

IN RE:

[HIGHER GROUND EDUCATION, INC][HGE FIC E LLC]

Debtors.

CHAPTER 11

CASE NO. [25-80121 (MVL)]

(Jointly Administered)

MOTION OF [LIU Xiaodong] FOR ALLOWANCE OF LATE-FILED PROOF OF CLAIM PURSUANT TO FED. R. BANKR. P. 9006(b)(1) AND ALLOWANCE OF CLAIM

[LIU Xiaodong] ("Creditor"), by and through **his** undersigned representative, hereby files this Motion (the "Motion") for an Order pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules") granting allowance of its late-filed Proof of Claim. In support of this Motion, Creditor respectfully represents as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334.

2. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (B).

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

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II. BACKGROUND AND FACTS

4. On June 17, 2025, the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

5. Creditor is a valid creditor of the Debtors in the amount of $[500,000.00], arising from [Investing in the HGE FIC E LLC Project].

6.Lack of Proper/Effective Notice: Creditor was never directly notified of these Chapter 11 proceedings or the Bar Date by the Debtors or the Court. Creditor only became aware of this information informally through another investor in the [HIGHER GROUND EDUCATION, INC] project in November 2025.

7. As a direct result of not receiving effective notice, Creditor was unaware of the established Bar Date and was unable to submit its Proof of Claim prior to the Bar Date.

8. Upon learning of the bankruptcy proceeding and the Bar Date from said investor, Creditor acted with utmost diligence and promptly filed **his** Proof of Claim on November 15, 2025 (Claim No. [579]), and subsequently submitted this Motion.

III. LEGAL ARGUMENT: EXCUSABLE NEGLECT

9. Bankruptcy Rule 9006(b)(1) permits the Court to accept a late-filed proof of claim upon motion where the failure to act was the result of "excusable neglect."

10. In *Pioneer Investment Services Co. v. Brunswick Associates L.P.*, 507 U.S. 380 (1993), the Supreme Court established an equitable standard for evaluating "excusable neglect," considering four key factors:

(a) Danger of Prejudice to the Debtor: Granting this Motion will not prejudice the Debtors or their estate. The reorganization/liquidation plan [has not yet

been confirmed / is still in implementation], and allowing this valid claim will not disrupt distributions or cause unexpected burden.

(b) Length of Delay and Impact on Judicial Proceedings: The delay in filing was minimal, and the Creditor acted with extreme promptness immediately upon discovering the Bar Date. Allowing the claim will not delay judicial proceedings.

(c) Reason for the Delay (Lack of Notice): The primary reason for the delay was the failure of the Creditor to receive effective or proper notice of the Bar Date. The lack of proper notice constitutes a classic grounds for excusable neglect under *Pioneer*.

(d) Good Faith: Creditor acted in complete good faith at all times and sought relief promptly upon learning of the Bar Date.

IV. PRAYER FOR RELIEF

WHEREFORE, Creditor respectfully requests that this Court enter an Order:

1. Granting this Motion in its entirety;

2. Deeming **Creditor's** late-filed Proof of Claim (Claim No. 579) as timely filed and allowed for all purposes in these Chapter 11 cases; and

3. Granting the Creditor such other and further relief as the Court deems just and proper.

Dated: [09/03/2026]

Respectfully submitted,

By: Liu Xiao dong

Name: [LIU Xiaodong]

Phone: [852 63680396]

Email: [105408959@qq.com]



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RM 2106 21/F, SHUN TAK CTR WEST TOWER
SHEUNG WAN

HONG KONG
Hong Kong SAR, China

GOGREEN PLUS

Origin: HKG

To : BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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75242 DALLAS Texas
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