Docket #0937 Date Filed: 09/10/2026

SEP 10 2026

CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

IN RE:

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

Debtors.

CHAPTER 11

CASE NO. [25-80121 (MVL)]

(Jointly Administered)

DECLARATION OF [LIU Xiaodong] IN SUPPORT OF MOTION FOR ALLOWANCE OF LATE-FILED PROOF OF CLAIM

I, [LIU XIAODONG], hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

I am an individual creditor in the above-captioned Chapter 11 bankruptcy cases. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently thereto.

I make this declaration in support of the Motion for Allowance of Late-Filed Proof of Claim filed concurrently herewith.

Prior to November 2025, I was never directly notified of these Chapter 11 bankruptcy proceedings or the established Bar Date by the Debtors, the Court, or any official notice agent.

I only became aware of the Debtors' bankruptcy proceedings and the Bar Date in November 2025, when I was informally informed of these matters by another investor in theHIGHER GROUND EDUCATION, INC project.

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Immediately after receiving this information, I took prompt and diligent action to protect my legal rights and filed my Proof of Claim (Claim No. 579) on November 15, 2025.

The delay in filing my Proof of Claim was solely due to the lack of official notice, and I acted in complete good faith at all times upon discovering the bankruptcy proceeding.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: [September 3, 2026]

By: LIU Xiaodong

Name: [LIU Xiaodong]

Phone: [852 63680396]

Email: [105408959@qq.com]