Docket #0940 Date Filed: 09/21/2026

FILED
SEP 21 2026
CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

Courtney Latham
12350 Shore Acres Drive
Jacksonville, FL 32225
770-500-8137
clatham@evnerbehaviorservices.com

September 11, 2026

VIA FIRST-CLASS MAIL

Clerk of Court
U.S. Bankruptcy Court for the Northern District of Texas
Earle Cabell Federal Building
1100 Commerce St., Rm. 1254
Dallas, TX 75242-1496

Re: In re Higher Ground Education, Inc., Case No. 25-80121 (MVL) (Chapter 11) Submission of Claimant's Response and Objection to Liquidating Trustee's Second Omnibus Objection

Dear Clerk of Court,

Enclosed for filing in the above-captioned Chapter 11 proceeding, please find the original, physically executed copy of **Claimant's Response and Objection to the Liquidating Trustee's Second Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims)**, along with the following attached evidence:

1. **Exhibit A:** Printed copy of the text message exchange verifying the logistical disruptions caused by out-of-town houseguests from July 26–30, 2025.
2. **Exhibit B:** Printed copy of the medical facility verification documents regarding my son's eye surgery on July 31, 2025.

This filing is submitted on behalf of creditor Courtney Latham (*Pro Se*) with respect to **Claim No. 492**.

Please file-stamp this document on the main court docket at your earliest convenience. Concurrently with this submission, an electronic copy of this entire packet is being served directly upon counsel for the Liquidating Trustee via email at acarson@grayreed.com.

Thank you for your assistance with this matter. Should you have any questions regarding this submission, please contact me directly at 770-500-8137.

Respectfully submitted,

S Latham

Courtney Latham
Claimant Pro Se

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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.,	§	
	§	Case No. 25-80121 (MVL)
Reorganized Debtor.	§	

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CLAIMANT'S RESPONSE AND OBJECTION TO LIQUIDATING TRUSTEE'S SECOND OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (LATE-FILED CLAIMS)

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

Claimant, Courtney Latham ("Claimant"), respectfully files this Response and Objection to the Liquidating Trustee's Second Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims) [Docket No. 932] (the "Objection") filed by John P. Madden, Liquidating Trustee of the HGE Liquidating Trust. In support of this Response, Claimant respectfully represents as follows:

I. BACKGROUND

1. On June 17 or 18, 2025, the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

2. The Court entered a Bar Date Order establishing August 7, 2025, as the deadline for non-governmental entities to file proofs of claim (the "General Bar Date").

3. Claimant filed a Proof of Claim against Higher Ground Education, Inc., which has been assigned **Claim No. 492** on the official claims register, seeking a priority claim status in the exact amount of **$1,057.14**.

4. Claimant's Proof of Claim was filed on **August 27, 2025**, which is approximately twenty (20) days following the expiration of the General Bar Date.

5. On September 2, 2026, the Liquidating Trustee filed the Objection, seeking to disallow and expunge Claimant's claim in its entirety solely on the basis that it was filed after the General Bar Date.

II. ARGUMENT & LAW

6. Pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1), the Court has the equitable power to permit a late-filed proof of claim where the claimant's failure to meet the deadline was the result of **"excusable neglect."**

7. In *Pioneer Investment Services Co. v. Brunswick Associates L.P.*, 507 U.S. 380 (1993), the United States Supreme Court established four factors to govern the excusable neglect inquiry: (1) the danger of prejudice to the debtor; (2) the length of the delay and its potential impact on judicial proceedings; (3) the reason for the delay, including whether it was within the reasonable control of the movant; and (4) whether the movant acted in good faith.

8. Application of the *Pioneer* factors strongly supports a finding of excusable neglect in this instance, and Claimant's brief delay should be completely excused based on the following specific factors:

a. **Reason for the Delay:** The Claimant's nominal twenty (20) day delay was the direct result of a severely compressed notification window compounded by urgent family and medical obligations. The bar date notice was not mailed by the claims agent until July 18, 2025 (See Doc. 290), leaving Claimant with a restricted window of less than two weeks to review the dense materials upon postal delivery. Immediately following delivery, from July 26–30, 2025, Claimant was hosting out-of-town houseguests, causing unavoidable logistical disruptions (See text message logs verification attached hereto as Exhibit A). Crucially, on July 31, 2025, Claimant's son underwent scheduled eye surgery (See medical verification attached hereto as Exhibit B). The days immediately surrounding the August 7, 2025 deadline required Claimant's full-time caretaking capacity for her son's post-operative recovery, entirely disrupting her ability to execute and return complex legal filings. Claimant acted in absolute good faith, submitting the completed Proof of Claim on August 27, 2025, immediately upon the stabilization of her family's medical situation.

b. **Length of the Delay and Impact on Proceedings:** The delay was extraordinarily brief. Claimant filed the Proof of Claim on August 27, 2025—a mere twenty (20) days after the General Bar Date. This nominal delay occurred months before the Plan of Reorganization was confirmed in November 2025 and caused absolutely zero disruption, inconvenience, or administrative delay to the Debtors' estate, the Court, or the scheduling of these Chapter 11 cases.

c. **Good Faith:** Claimant has acted in complete good faith at all times throughout this

proceeding. Claimant moved expeditiously to file the Proof of Claim immediately upon the stabilization of her caretaking duties, with no intention to manipulate, hinder, or delay the court or the legal restructuring process.

d. **Lack of Prejudice to the Debtor:** Allowing this single, minor claim will not cause unfair prejudice to the Reorganized Debtor or other creditors. The Trustee is tasked with reviewing hundreds of millions of dollars in claims, and evaluating this small priority claim imposes no unanticipated administrative burden.

III. CONCLUSION & RELIEF REQUESTED

WHEREFORE, Claimant respectfully requests that this Court (i) overrule the Liquidating Trustee's Objection with respect to Claimant's **Claim No. 492**; (ii) deem Claimant's Proof of Claim as timely filed under the doctrine of excusable neglect; and (iii) grant Claimant such other and further relief as the Court deems just and proper.

Dated: September 11, 2026.

Respectfully submitted,

By: C Latham

Courtney Latham
12350 Shore Acres Drive
Jacksonville, FL 32225
Telephone: 770-500-8137
Email: clatham@evnerbehaviorservices.com
Claimant Pro Se

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

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

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

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Dated: September 11, 2026.

Respectfully submitted,

By: S Latham

Courtney Latham
12350 Shore Acres Drive
Jacksonville, FL 32225
Telephone: 770-500-8137
Email: clatham@evnerbehaviorservices.com
Claimant Pro Se

Exhibit A

Text Exchange


5:53
LTE 45
32
Lisett
How are the kids?
Jul 25, 2025 at 6:00 PM
What time are you planning on getting in tomorrow?
Edited
Jul 25, 2025 at 7:16 PM
Hopefully not later than 2
Jul 25, 2025 at 9:23 PM
Okay! keep us updated!
We are build a chicken coop tomorrow and will stop when yall get close!
Jul 26, 2025 at 8:15 AM
Ok will keep you posted
Okay
Jul 26, 2025 at 10:17 AM
We haven't left
Oh no worries!
+ Exhibit A

Exhibit B

Medical Verification