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

CERTIFICATE OF NO OBJECTION
REGARDING THE LIQUIDATING TRUSTEE'S
SECOND MOTION FOR ENTRY OF AN ORDER EXTENDING
THE PERIOD TO FILE AND SERVE OBJECTIONS TO CLAIMS

Pursuant to the *Procedures for Complex Cases in the Northern District of Texas*, the undersigned counsel for the above-captioned debtors and debtors in possession (collectively, the "Debtors") certifies as follows:

1. On August 27, 2026, John P. Madden, in his capacity as Trustee of the HGE Liquidating Trust (the "Liquidating Trustee"), filed *The Liquidating Trustee's Second Motion for*

[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 Debtor's claims and noticing agent at https://w

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Entry of an Order Extending the Period to File and Serve Objections to Claims [Docket No. 922] (the "Motion").

2. On the same date, the Motion was served on the Master Service List via electronic mail, where available, and via U.S. First Class Mail where email is unavailable, as indicated in the *Certificate of Service* included in the Motion.

3. The deadline for parties to file responses to the relief requested in the Motion was September 21, 2026.

4. As of the date hereof, no objections or responses to the Motion have been filed on the Court's docket, and the Liquidating Trustee is unaware of any formal or informal objections to the Motion. Accordingly, the Liquidating Trustee requests that the Court enter the proposed order attached hereto as **Exhibit A** at its earliest convenience.

Respectfully submitted this 28th day of September, 2026.

GRAY REED

By: */s/ Jason S. Brookner*

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Certificate of Service

I certify that on September 28, 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.

/s/ Jason S. Brookner
Jason S. Brookner

Exhibit A

Proposed Order

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

In re:	§	Chapter 11
HIGHER GROUND EDUCATION, INC., *et al.*,	§	Case No. 25-80121 (MVL)
Reorganized Debtors.[1]	§	(Jointly Administered)

ORDER GRANTING LIQUIDATING TRUSTEE'S SECOND MOTION FOR ENTRY OF AN ORDER EXTENDING THE PERIOD TO FILE AND SERVE OBJECTIONS TO CLAIMS

Upon the motion (the "Motion")[2] of John P. Madden, in his capacity as Trustee of the HGE Liquidating Trust (the "Liquidating Trustee"), for entry of an order (this "Order") pursuant to rule 9006(b) of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"): (a) extending the time to file objections to claims (the "Claims Objection Deadline") for 90 additional days, from September 14, 2026, through and including Monday, December 14, 2026; and (b) granting related

[1] A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at https://www.veritaglobal.net/higherground. The Reorganized Debtors' service address for these chapter 11 cases is 1321 Upland Dr., PMB 20442, Houston, TX 77043.

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

relief; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157 (b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is permissible pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interest of the Estates; and this Court having found that notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Claims Objection Deadline is extended through and including December 14, 2026.

2. Verita, as claims, noticing and solicitation agent for the Debtors, is authorized and directed to update the claims register maintained in these chapter 11 cases to reflect the relief granted in this Order.

3. Notwithstanding anything to the contrary in the Bankruptcy Code, Bankruptcy Rules or Local Rules, this Order shall be immediately effective and enforceable upon entry.

4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF ORDER

Submitted by:

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