Docket #0946 Date Filed: 09/29/2026

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

FILED
SEP 29 2026
CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

In re:	)	
	)	
HIGHER GROUND EDUCATION, INC., (MVL)	)	Case No. 25-80121
	)	
Reorganized Debtor.	)	Chapter 11
	)	
CELINE ELODIE PADLY,	)	
	)	
Creditor / Respondent,	)	
	)	
v.	)	
	)	
JOHN P. MADDEN, Trustee of the HGE Liquidating Trust,	)	
	)	
Objecting Party.	)	

RESPONSE TO NOTICE OF LIQUIDATING TRUSTEE'S SECOND OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (LATE-FILED CLAIMS) AND REQUEST FOR LEAVE / ALLOWANCE

PART 1 - PREFACE

Objecting party's counsel: Gray Reed, 1845 Woodall Rodgers Fwy, Ste. 1300, Dallas, TX 75201. (Attorneys listed on the objection include Jason S. Brookner and others — copy the full service list from your papers.)

Claims website: https://www.veritaglobal.net/higherground

E-file portal: https://ecf.txnb.uscourts.gov/

Claim Number: DRC Claim No. 531 (priority claim)

PART 2 — WHO I AM

1. My name is Celine Elodie Padly.

2. My mailing address is 1403 11th Avenue South, Nashville, TN 37.

2580121260929000000000002

3. My phone number is 615-540-2553.

4. My email is cpadly@gmail.com.

5. I am filing this response on my own behalf and am unrepresented.

PART 3 — WHAT I AM ASKING THE COURT TO DO

I respectfully ask the Court to:

A. Deny / overrule the objection to the extent it seeks to disallow, strike, expunge, or otherwise eliminate my claim, DRC Claim No. 531, as untimely; and

B. Find that DRC Claim No. 531 was timely filed, because I completed Official Form 410 and deposited it in the U.S. mail via USPS on August 5, 2025 — two days before the August 7, 2025 General Bar Date — together with receipts and proof of my pending refund. Any gap between my mailing date and the claims agent's alleged recorded receipt/docketing date of October 1, 2025 reflects the claim's agent's failure to timely record said receipt of claim and apply it to the list of creditors in a timely fashion, not any delay or failure on my part; and

C. In the alternative, if the Court finds Claim No. 531 was not timely filed, grant leave to deem it timely filed / allow a late-filed proof of claim, given my lack of notice of the bankruptcy case and bar date, my prompt action the same day I learned of the case, and the Debtor's own continued acknowledgment of my refund request both before and after the bar date (including a call I received on January 14, 2026 confirming my mailing address for the refund); and

D. Allow my claim in the amount of $3,200.00 as a priority claim under 11 U.S.C. § 507(a)(7) (deposits toward purchase, lease, or rental of property or services for personal, family, or household use), consistent with the Proof of Claim as filed; and

E. Grant any other relief the Court finds fair.

PART 4 — MY FACTS

I declare under penalty of perjury that the following is true to the best of my knowledge:

☒ I enrolled my two children — Wesley McMurrich and my second child ("Baby McMurrich", now born and named Lilliane McMurrich) — at Guidepost Montessori of Green Hills on April 11, 2025, and paid tuition, a deposit, and a registration fee totaling $3,200.00 ($1,400 deposit x 2 children + $400 registration). Proof of payment is Exhibit A.

☒ About one month later, on May 14, 2025, I was informed that the school was being sold / transferred to a new operator as part of a transition.

☒ The school offered a refund if I did not want to continue with the new operator, Reorganized Debotr, Higher Ground Education Inc. I chose the refund. A copy of what this confirmation is attached hereto and marked as Exhibit D. On June 26, 2025, Emma Broadfoot (Head of School, Guidepost Montessori of Green Hills) confirmed by email that a refund request had been created for the full $3,200.00 on my VISA card ending in 1588, and that a support ticket (No. 112686) had been opened to track it. Attached hereto, as Exhibit B, please find evidence of the support ticket for approval of issuance of a full refund in the amount of $3,200.00. Nonetheless, said refund was never processed and never received.

☒ Shortly thereafter, the purchasing company, Reorganized Debotr, Higher Ground Education, Inc., filed Chapter 11 bankruptcy (petition date on or about June 17–18, 2025).

☒ I never received official notice from the Reorganized Debtor, the court, or a claims agent that the bankruptcy was filed and/or that August 7, 2025 was the deadline to file a proof of claim. My address during this time was correct: 1403 11th Avenue South, Nashville, TN 37203. My statement about not getting bankruptcy notices is Exhibit H.

☒ After multiple unsuccessful attempts to contact by phone and email Liz Gomez, representative for the Reorganized Debtor, with regards to the status of reimbursement, I started a google search resulting in the discovery of the Bankruptcy on my own on August 5, 2025.

☒ On August 5, 2025, immediately upon my own's discovery of the bankruptcy, I completed Form 410 (Proof of Claim) and mailed it right away. The Proof of Claim was mailed by USPS two days before the August 7, 2025 bar date, despite Reorganized Debtor's failure to provide notification of the Bankruptcy.

☒ I mailed Official Form 410 (Proof of Claim) via USPS to the claims agent as provided for in the Form 410, along with receipts and documentation of my pending refund (the June 26, 2025 Emma Broadfoot email and ticket No. 112686). A copy of what I sent is attached hereto and marked as Exhibit C.

☒ No acknowledgment of receipt was received from the Reorganized Debtor or claims agent at the time of mailing. Reorganized Debtor's form failed to provide a confirmation option, online submission, or contact information to confirm receipts. It further failed to provide any instructions for mailing the form via other means than USPS.

☒ I have emails confirming a pending refund — the June 26, 2025 email from Emma Broadfoot. Those are Exhibit B.

☒ The school / debtor assigned a ticket / case number in their system for my refund: No. 112686. Proof is Exhibit B.

☒ On January 14, 2026, I received a phone call from a representative from Reorganized Debtor confirming/validating my mailing address for the refund and stating that it would be issued within the next few months. Proof/description is Exhibit E (a signed statement describing the call, since it was verbal).

☒ After that call, there was little to no follow-through by Reorganized Debtor, despite my numerous follow-up calls to Guidepost/Higher Ground Education, none of which were returned. Reorganized Debtor failed to respond and failed to provide the refund as stated it would.

☒ On September 12, 2026, I was served with an objection seeking to disallow or remove my claim. The objection title is: "Notice of Liquidating Trustee's Second Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims)." Docket / ECF No.: 932.

☒ The objection (Doc. 932) is a late-filed claims omnibus objection. It states my claim was filed after the August 7, 2025 General Bar Date, and that it was recorded/filed October 1, 2025. My claim appears as DRC Claim No. 531 (priority claim). (Attached is a copy/screenshot from the Verita claims site as Exhibit F.)

☒ Before filing this Response, I made multiple good-faith attempts to reach a consensual resolution with counsel for the Liquidating Trustee. I emailed Amber Carson (acarson@grayreed.com) on September 17, 2026; followed up by phone and email on September 18, 2026; and followed up again by phone and email on September 22, 2026, that time also including Jason Brookner, Aaron Kaufman, and Emily Shanks on the email. I have not received a response or any acknowledgment from any of them. Proof of this outreach is Exhibit H.

PART 5 — WHY THE OBJECTION SHOULD BE DENIED

1. I mailed my claim before the bar date — the October 1 date is a processing date, not my filing date.

Despite the Reorganized Debtor's failure to provide notice of the bankruptcy, I completed and mailed Official Form 410, with receipts and proof of my pending refund, via USPS on August 5, 2025 — two days before the August 7, 2025 bar date. Reorganized Debtor recorded the claim with the court, docketed as DRC Claim No. 531, on or about October 1, 2025. Reorganized Debtor further acknowledged receipt of the the claim on or about January 14, 2026 and confirmed it would issue payment, which was never issued or received.

I should not be penalized for the time it took Reorganized Debtor to open and log my claim that was mailed in a timely fashion according to Reorganized Debtor's instructions despite Reorganized Debtor's failure to notify me of the bankruptcy while being a known creditor prior to the Chapter 11 Bankruptcy filing.

2. I was a known refund creditor.

I paid money. The school offered a refund. I accepted. They put my refund in their system with a ticket number (112686) and sent me an email on June 26, 2025 confirming it was pending. That means they knew who I was and that they owed me money well before the bankruptcy was filed.

3. I did not get bankruptcy notice — including notice of the August 7, 2025 claims deadline.

Reorganized Debtor was legally required to provide notice of the Bankrupty to known creditors and to provide the deadline to file claims. Reorganized Debtor failed to provide any notice of the bankruptcy or of that deadline, despite having acknowledged the refund obligation and debt on its books. I found out about the bankruptcy myself, through my own research, on August 5, 2025, and acted the same day to file the Claim with Reorganized Debtor prior to Augusts 7, 2025. Reorganized Debtor then failed to record with the court my Claim as a creditor until October 1, 2025.

4. Reorganized Debtor treated my claim as real, acknowledged the debt, and confirmed pending payment — before and after the Bar Date and the October 1, 2025 docketed claim date.

On January 14, 2026 — months after both the bar date and the docketed claim date of October 1, 2025— I received a call from a representative confirming my mailing address for my refund and telling me it would arrive within a few months. Reorganized Debtor's actions, statements and representations, all in bad faith, should bar them from striking my claim after they confirmed my address for a refund prior to the Bankruptcy and then months after the Bar Date.

5. If the Court needs anything further to treat Claim No. 531 as timely, I respectfully ask for leave to have it deemed timely.

If the Court does not accept that mailing before the bar date makes my claim timely, I ask in the alternative for leave to file/deem timely under the rules allowing more time for excusable neglect and lack of notice (see Part 6).

6. This is a small, honest refund claim.

The amount is $3,200.00. I have proof of payment, proof of the refund request being ticketed and that the refund was approved prior to the sale and prior to the bankruptcy. Despite Reorganized Debtor's failure to provide notice of the bankruptcy, I submitted my claim before the Bar Date. I acted in good faith and promptly at every step. Allowing this claim will not unfairly harm the case compared to cutting out a parent who mailed her claim on time and was never given notice.

7. I tried to resolve this without burdening the Court.

Before filing this Response, I reached out multiple times to counsel for the Liquidating Trustee in a good-faith effort to reach a consensual resolution: to Amber Carson by email on September 17, 2026; by phone and email again on September 18, 2026; and by phone and email on September 22, 2026, that time also copying Jason Brookner, Aaron Kaufman, and Emily Shanks. None of them responded or acknowledged my outreach in any way. I am filing this Response only because that outreach went unanswered and my deadline is approaching.

PART 6 — REQUEST FOR LEAVE

If the Court determines that DRC Claim No. 531 was not timely filed notwithstanding my August 5, 2025 mailing, I respectfully ask the Court to:

1. Grant me leave to have my claim treated as a timely-filed (or timely late-filed) proof of claim under the bankruptcy rules that allow more time when a creditor has good cause (including lack of notice and excusable neglect); and

2. Accept DRC Claim No. 531, in the amount of $3,200.00, as timely for all purposes; and

3. Direct the clerk / claims agent to reflect it as such on the claims register.

PART 7 — EXHIBITS

Exhibit	What it is
A	Proof of payment (tuition, deposit, and registration fee — $3,200 total)
B	June 26, 2025 email from Emma Broadfoot confirming the $3,200 refund request and support ticket number
C	Copy of the Official Form 410 Proof of Claim
D	Notification of Guidepost Montessori of Green Hills sale, offer for a refund from the school and request for a refund update
E	Signed statement describing the January 14, 2026 phone call confirming my address for the refund
F	Copy/screenshot of DRC Claim No. 531 from the Verita claims register
G	My signed statement: I never received bankruptcy notice or notice of the August 7, 2025 claims bar date
H	Records of September 17, 18, and 22, 2026 email and phone outreach to Amber Carson, Jason Brookner, Aaron Kaufman, and Emily Shanks (counsel for the Liquidating Trustee) seeking consensual resolution

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PART 8 — HEARING

I ask to appear at the virtual hearing on October 20, 2026, at 2:00 PM, and to be heard on this Response and request. I will follow the Court's instructions for virtual appearance (Zoom / Teams / dial-in) when the Court or clerk provides them.

PART 9 — CERTIFICATE OF SERVICE

I certify that on _____ , I served a true copy of this Response and Exhibits on:

1. Counsel for the Liquidating Trustee (from Doc. 932): Gray Reed, 1845 Woodall Rodgers Fwy, Ste. 1300, Dallas, TX 75201. Also serve Jason S. Brookner (jbrookner@grayreed.com), Aaron M. Kaufman (akaufman@grayreed.com), Amber M. Carson (acarson@grayreed.com), and Emily F. Shanks (eshanks@grayreed.com).

Method of service:

☐ U.S. Mail

☐ Email (if allowed)

☐ CM/ECF electronic service

☐ Other: _____

Date: _____ Signature: _____

Printed name: Celine Elodie Padly

PART 10 — VERIFICATION / DECLARATION

I declare under penalty of perjury that the facts I checked and wrote in this paper are true and correct to the best of my knowledge.

Date: _____ Signature: _____

Printed name: Celine Elodie Padly

EXHIBITS

to Response to Notice of Liquidating Trustee's Second Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims)

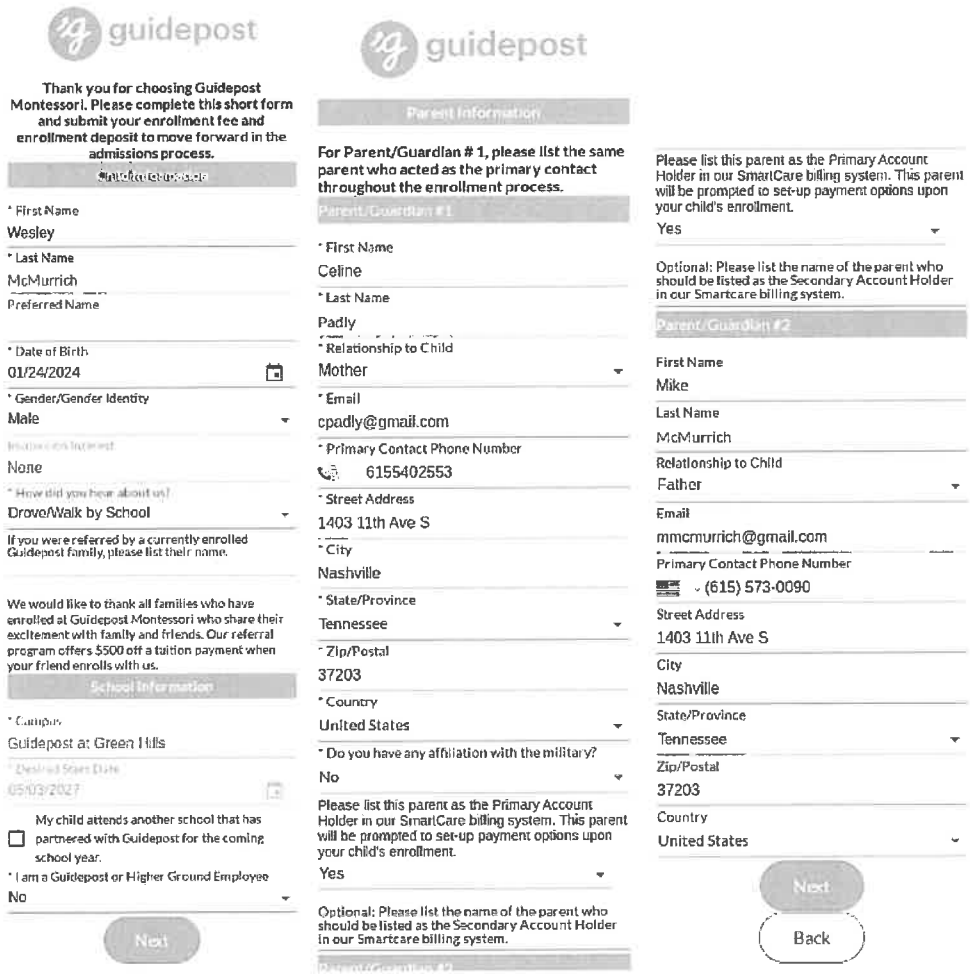
Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 — Celine Elodie Padly

Exhibit	Description
A	Proof of payment (tuition, deposit, and registration fee — $3,200 total)
B	June 26, 2025 email from Emma Broadfoot confirming the $3,200 refund request and support ticket number
C	Copy of the Official Form 410 Proof of Claim
D	Notification of Guidepost Montessori of Green Hills sale, offer for a refund from the school, and request for a refund
E	Signed statement describing the January 14, 2026 phone call confirming my address for the refund
F	Copy/screenshot of DRC Claim No. 531 from the Verita claims register
G	My signed statement: I never received bankruptcy notice or notice of the August 7, 2025 claims bar date
H	Records of September 17, 18, and 22, 2026 email and phone outreach to Amber Carson, Jason Brookner, Aaron Kaufman, and Emily Shanks seeking consensual resolution

EXHIBIT A

Proof of Payment (Tuition, Deposit, and Registration Fee — $3,200 Total)

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)



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Thank you for choosing Guidepost Montessori. Please complete this short form and submit your enrollment fee and enrollment deposit to move forward in the admissions process.

Student Information

* First Name
Wesley
* Last Name
McMurrich
Preferred Name
* Date of Birth
01/24/2024
* Gender/Gender Identity
Male
Interests Interest
None
* How did you hear about us?
Drove/Walk by School
If you were referred by a currently enrolled Guidepost family, please list their name.

We would like to thank all families who have enrolled at Guidepost Montessori who share their excitement with family and friends. Our referral program offers $500 off a tuition payment when your friend enrolls with us.

School Information

* Campus
Guidepost at Green Hills
* Desired Start Date
09/03/2027
My child attends another school that has partnered with Guidepost for the coming school year.
* I am a Guidepost or Higher Ground Employee
No
Next

guidepost

Parent Information

For Parent/Guardian # 1, please list the same parent who acted as the primary contact throughout the enrollment process.

Parent/Guardian # 1
* First Name
Celine
* Last Name
Padly
* Relationship to Child
Mother
* Email
cpadly@gmail.com
* Primary Contact Phone Number
6155402553
* Street Address
1403 11th Ave S
* City
Nashville
* State/Province
Tennessee
* Zip/Postal
37203
* Country
United States
* Do you have any affiliation with the military?
No
Please list this parent as the Primary Account Holder in our SmartCare billing system. This parent will be prompted to set-up payment options upon your child's enrollment.
Yes
Optional: Please list the name of the parent who should be listed as the Secondary Account Holder in our Smartcare billing system.

Please list this parent as the Primary Account Holder in our SmartCare billing system. This parent will be prompted to set-up payment options upon your child's enrollment.
Yes
Optional: Please list the name of the parent who should be listed as the Secondary Account Holder in our Smartcare billing system.
Parent/Guardian #2
First Name
Mike
Last Name
McMurrich
Relationship to Child
Father
Email
mmcmurrich@gmail.com
Primary Contact Phone Number
(615) 573-0090
Street Address
1403 11th Ave S
City
Nashville
State/Province
Tennessee
Zip/Postal
37203
Country
United States
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guidepost

Enrollment Deposit

Schedule Details

Please note that some of our campuses have different schedules. In general, the schedule offered at our campuses are:

- Half-days: Drop-off between 7:00 and 8:30am, pick-up at 12:30pm
- Full Day: Drop off between 7:00 and 8:30am, pick-up between 3:00 and 6:00pm

Schedule

5-Day Full-Day

Deposit Policy

We are eager to find your child a place in our school. As soon as one is available, we will send you an enrollment offer with a confirmed start date. In some cases, there will be an immediate opening and your child could begin in a matter of days or weeks. In other cases, the program may be full and we will keep you informed about future openings. Please note that a balance of ages and genders is highly desirable in a Montessori classroom. We think carefully about these and other considerations, in addition to the length of time a family has been waiting for a spot, in offering classroom placements from our pre-registered families. Preference may be given in instances of siblings or employee children.

By submitting your non-refundable enrollment fee and enrollment deposit you are indicating your intent to enroll your child at Guidepost Montessori.

Your deposit both pre-registers you for the program and secures the current rate sheet. Enrollment deposits are applied to the last month of your child's enrollment in the school (see below). The enrollment deposit is nonrefundable under nearly all circumstances. The only circumstance in which the enrollment deposit is refundable is if we are not able to inform you of a start date within 6 months of submitting your enrollment deposit. We will make every effort to inform you of the future

Your deposit both pre-registers you for the program and secures the current rate sheet. Enrollment deposits are applied to the last month of your child's enrollment in the school (see below). The enrollment deposit is nonrefundable under nearly all circumstances. The only circumstance in which the enrollment deposit is refundable is if we are not able to inform you of a start date within 6 months of submitting your enrollment deposit. We will make every effort to inform you of the future start date within a 6-month window. The future start date may be outside of the 6-month window, since very often our parents are planning several months in advance, perhaps matching a child's start date to the calendar year or school year.

If your child leaves the school, you will be asked to give one full month's notice. Your child's final day will be the last day of the month following the one in which you give notice (e.g. if you give notice on April 22, your child's last day will be May 31). We do not prorate tuition for mid-month withdrawals and your child is entitled to attend school through the last academic day of their last month. Ordinarily, your enrollment deposit will be applied to tuition for your child's last month of school. Depending on the deposit and monthly tuition amounts, there may be either an amount refunded or an amount owed.

* Enrollment Deposit

1,400.00

* Enrollment Fee

0.00

Program

Children's House

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Your Personal Tuition Rate Sheet

You have received a personal tuition rate sheet for your child. This rate sheet is yours for your child's entire tenure at our school. It tells you, not only what tuition will be for your child this year, but also what tuition will be for the same child, in any future year, in any program we offer if you remain continuously enrolled. We do this so that we can limit tuition increases to our existing families, while providing complete transparency and predictability about what your tuition will be in a future year.

For any enrolling child, including siblings of children already enrolled, tuition pricing is based on the rate sheet that is current at the time the enrollment deposit is placed.

Your Tuition Rate Subject to Change

Completing the enrollment application and submitting your deposit secures your tuition rate, according to the tuition rate sheet active at the time. Please note that until this form is completed and the enrollment deposit paid, tuition pricing cannot be guaranteed, and is subject to change. Tuition rates provided when families tour our school may differ from the current tuition rates in effect at the time of this offer. Tuition rates set on the rate sheet are secured except in the event of extreme circumstances beyond Guidepost's control, such as hyperinflation, force majeure, or fundamental changes to the school imposed by law.

Admission

Enrollment spots are limited. Enrollment selections will be made based on a variety of factors, including the sequence of enrollment deposits received, as well as a variety of other admissions criteria, in the discretion of Guidepost Montessori.

Enrollment Deposit

Your enrollment deposit both pre-registers you for the program and secures the current rate sheet. Enrollment deposits are applied to the last month of your child's enrollment in the school (see below "Withdrawal"). The enrollment deposit is nonrefundable under nearly all circumstances. The only circumstance in which the enrollment deposit is refundable is if we are not able to inform you of a start date within 6 months of submitting your enrollment deposit. We will make every effort to inform you of the future start date within a 6-month window. The future start date may be outside of the 6-month window, since very often our parents

submitting your enrollment deposit. We will make every effort to inform you of the future start date within a 6-month window. The future start date may be outside of the 6-month window, since very often our parents are planning several months in advance, perhaps matching a child's start date to the calendar year or school year.

[illegible]

Our Picco, Nido, Young Toddler, Toddler, and Children's House programs are year round. Tuition is due on the 20th of the month prior to enrollment, every month of the year (e.g. your September tuition payment is due on August 20th). Our Elementary program is an academic year program. Academic year tuition is broken into 10 equal payments, due on the 20th of the month prior to the month containing the first day of school.

Your first month's tuition is prorated based on your child's start date and is due on the 20th of the calendar month prior to the one in which your child will start. For example, if your child starts February 5th, your tuition is due January 20th.

All parent billing accounts are set to auto-pay status. This means that your tuition payment will be automatically withdrawn on the 20th of each month through ACH or credit card payment. Credit card payments incur a small pass-through processing fee of 2.5% per payment.

In the event of a failed auto-payment due to insufficient funds, any tuition payments received after the 20th of the month will be subject to a late fee. The initial late fee of $25 will be charged on the 21st of the month. If payment is not received by the 25th, an additional fee of $50 will be imposed, for a total of $75. Repeated late payments may result in the discontinuation of enrollment.

Absent a written exception, tuition must be received prior to the 1st of any given month in order for your child to continue attending school that month. In cases of an unpaid tuition balance, we reserve the right at any time to require that the parents/guardians settle the remaining balance in full to maintain ongoing enrollment.

Checks returned by the bank will incur a processing fee in addition to the late fee.

No Tuition Refunds

Please note that Guidepost Montessori cannot issue tuition refunds under any circumstances, for any reason.

[illegible]

In order to accurately plan for our future programs, we ask parents to provide notice of re-enrollment for the upcoming academic

[illegible]

In order to accurately plan for our future programs, we ask parents to provide notice of re-enrollment for the upcoming academic year by our re-enrollment deadline. If you provide notice by this deadline, your child is guaranteed a spot in the program, we will waive the enrollment fee and you will maintain the child's current rate sheet. You may still re-enroll after the deadline has passed if spots are available, however, you will be required to pay the non-refundable enrollment fee and be subject to the tuition rates in effect for new families.

When you re-enroll your enrollment deposit "rolls forward" so you will not be asked to make an additional deposit payment. Please be aware that if you provide us with a notice of re-enrollment and then withdraw before the start of the new academic year, you forfeit your enrollment deposit, as well as any enrollment fee you may have paid for that upcoming academic year.

Withdrawal

If you choose to withdraw your child at any time, you are required to give official notice no later than the month prior to your child's final month. For the avoidance of ambiguity concerning withdrawals, the only method accepted for official withdrawal notice is your completion of our electronic withdrawal form, which will be provided by school leadership upon your request. The date on which you return the electronic withdrawal form will serve as your withdrawal notice date.

Your child's last day would then be the last academic day of the month that follows the month in which you give notice (e.g., if you give notice on April 17, your child's last day would be May 31). We do not pro-rate tuition for mid-month withdrawals and your child is entitled to attend school through the last academic day of their last month. Ordinarily, your enrollment deposit will be applied to tuition for your child's last month of school. Depending on the deposit and monthly tuition amounts, there may be either an amount refunded or an amount owed. If a refund is due, it will be issued within 30 days of the last academic day of your child's final month.

Dis-enrollment

Guidepost Montessori reserves the right, in its sole discretion, to discontinue the enrollment of any child, for any reason and at any time, with or without notice.

Non-Discrimination Policy

Guidepost Montessori does not discriminate on the basis of race, sex, national origin, disability, religion, or any other protected status. We make our best effort to accommodate the needs of every child who wishes to attend Guidepost Montessori. In the event that your child does have a disability or suspected disability, we will do a fully individualized assessment of your child in order to determine whether Guidepost Montessori possesses the necessary expertise and resources to provide for the best interests of your child, or, alternatively, whether the child may pose a health or safety threat to him/herself or others in our environment or require a fundamental alteration of our program.

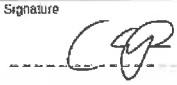
This is to acknowledge that I have read and understood, and agree to abide by all terms, conditions, and policies of this Enrollment Form. I agree that these terms, conditions, and policies are a condition of my child's enrollment at Guidepost Montessori. I understand that my enrollment fee is non-refundable and that my enrollment deposit is only refundable in the rare case that Guidepost Montessori is not able to inform me of a start date within 6 months of submitting my enrollment deposit. I understand that the future start date may be outside of the 6-month window since very often parents are planning several months in advance.

☑ * I've read and agree to the above terms

* Printed Full Name

Celine Padly

* Signature



Terms and Agreement Signed

[illegible]

Next

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guidepost

Payment Details

* Full Name

Celine Padly

* Email

cpadly@gmail.com

Please enter your payment information below.

* Campus

Guidepost at Green Hills

* Subtotal

1,400.00

Proceed to Payment

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guidepost

Thank you for choosing Guidepost Montessori. Please complete this short form and submit your enrollment fee and enrollment deposit to move forward in the admissions process.

Child Information

* First Name
Baby

* Last Name
McMurrich

Preferred Name

* Date of Birth
09/27/2025

* Gender/Gender Identity
Female

Immersion Interest
None

* How did you hear about us?
Drove/Walk by School

If you were referred by a currently enrolled Guidepost family, please list their name.

We would like to thank all families who have enrolled at Guidepost Montessori who share their excitement with family and friends. Our referral program offers $500 off a tuition payment when your friend enrolls with us.

School Information

* Campus
Guidepost at Green Hills

* Desired Start Date
05/03/2027

☐ My child attends another school that has partnered with Guidepost for the coming school year.

* I am a Guidepost or Higher Ground Employee
No

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guidepost

Parent Information

For Parent/Guardian # 1, please list the same parent who acted as the primary contact throughout the enrollment process.

Parent/Guardian #1

* First Name
Celine

* Last Name
Padly

* Relationship to Child
Mother

* Email
cpadly@gmail.com

* Primary Contact Phone Number
6155402553

* Street Address
1403 11th Ave S

* City
Nashville

* State/Province
Tennessee

* Zip/Postal
37203

* Country
United States

* Do you have any affiliation with the military?
No

Please list this parent as the Primary Account Holder in our SmartCare billing system. This parent will be prompted to set-up payment options upon your child's enrollment.
Yes

Optional: Please list the name of the parent who should be listed as the Secondary Account Holder in our Smartcare billing system.

Parent/Guardian #2

First Name
Mike

Last Name
McMurrich

Relationship to Child
Father

Email
mmcmurrich@gmail.com

Primary Contact Phone Number
(615) 573-0090

Street Address
1403 11th Ave S

City
Nashville

State/Province
Tennessee

Zip/Postal
37203

Country
United States

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Enrollment Deposit

Schedule Details

Please note that some of our campuses have different schedules. In general, the schedule offered at our campuses are:

- Half-days: Drop-off between 7:00 and 8:30am, pick-up at 12:30pm
- Full Day: Drop off between 7:00 and 8:30am, pick-up between 3:00 and 6:00pm

Schedule

5-Day Full-Day

Deposit Policy

We are eager to find your child a place in our school. As soon as one is available, we will send you an enrollment offer with a confirmed start date. In some cases, there will be an immediate opening and your child could begin in a matter of days or weeks. In other cases, the program may be full and we will keep you informed about future openings. Please note that a balance of ages and genders is highly desirable in a Montessori classroom. We think carefully about these and other considerations, in addition to the length of time a family has been waiting for a spot. In offering classroom placements from our pre-registered families. Preference may be given in instances of siblings or employee children.

By submitting your non-refundable enrollment fee and enrollment deposit you are indicating your intent to enroll your child at Guidepost Montessori.

Your deposit both pre-registers you for the program and secures the current rate sheet. Enrollment deposits are applied to the last month of your child's enrollment in the school (see below). The enrollment deposit is nonrefundable under nearly all circumstances. The only circumstance in which the enrollment deposit is refundable is if we are not able to inform you of a start date within 6 months of submitting your enrollment deposit. We will make every effort to inform you of the future start date within a 6-month window. The future start date may be outside of the 6-month window, since very often our parents are planning several months in advance, perhaps matching a child's start date to the calendar year or school year.

If your child leaves the school, you will be asked to give one full month's notice. Your child's final day will be the last day of the month following the one in which you give notice (e.g. if you give notice on April 22, your child's last day will be May 31). We do not prorate tuition for mid-month withdrawals and your child is entitled to attend school through the last academic day of their last month. Ordinarily, your enrollment deposit will be applied to tuition for your child's last month of school. Depending on the deposit and monthly tuition amounts, there may be either an amount refunded or an amount owed.

* Enrollment Deposit

1,400.00

* Enrollment Fee

400.00

Program

Toddler

Next

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guidepost

Your Personal Tuition Rate Sheet

You have received a personal tuition rate sheet for your child. This rate sheet is yours for your child's entire tenure at our school. It tells you, not only what tuition will be for your child this year, but also what tuition will be for the same child, in any future year, in any program we offer if you remain continuously enrolled. We do this so that we can limit tuition increases to our existing families, while providing complete transparency and predictability about what your tuition will be in a future year.

For any enrolling child, including siblings of children already enrolled, tuition pricing is based on the rate sheet that is current at the time the enrollment deposit is placed.

Last Tuition Rate Subject to Change

Completing the enrollment application and submitting your deposit secures your tuition rate, according to the tuition rate sheet active at the time. Please note that until this form is completed and the enrollment deposit paid, tuition pricing cannot be guaranteed, and is subject to change. Tuition rates provided when families tour our school may differ from the current tuition rates in effect at the time of this offer. Tuition rates set on the rate sheet are secured except in the event of extreme circumstances beyond Guidepost's control, such as hyperinflation, force majeure, or fundamental changes to the school imposed by law.

Admissions

Enrollment spots are limited. Enrollment selections will be made based on a variety of factors, including the sequence of enrollment deposits received, as well as a variety of other admissions criteria, in the discretion of Guidepost Montessori.

Enrollment Deposit

Your enrollment deposit both pre-registers you for the program and secures the current rate sheet. Enrollment deposits are applied to the last month of your child's enrollment in the school (see below "Withdrawal"). The enrollment deposit is nonrefundable under nearly all circumstances. The only circumstance in which the enrollment deposit is refundable is if we are not able to inform you of a start date within 6 months of submitting your enrollment deposit. We will make every effort to inform you of the future start date within a 6-month window. The future start date may be outside of the 6-month window, since very often our parents

submitting your enrollment deposit. We will make every effort to inform you of the future start date within a 6-month window. The future start date may be outside of the 6-month window, since very often our parents are planning several months in advance, perhaps matching a child's start date to the calendar year or school year.

Our Pikka, Nido, Young Toddler, Toddler, and Children's House programs are year round. Tuition is due on the 20th of the month prior to enrollment, every month of the year (e.g. your September tuition payment is due on August 20th). Our Elementary program is an academic year program. Academic year tuition is broken into 10 equal payments, due on the 20th of the month prior to the month containing the first day of school.

Your first month's tuition is prorated based on your child's start date and is due on the 20th of the calendar month prior to the one in which your child will start. For example, if your child starts February 5th, your tuition is due January 20th.

All parent billing accounts are set to auto-pay status. This means that your tuition payment will be automatically withdrawn on the 20th of each month through ACH or credit card payment. Credit card payments incur a small pass-through processing fee of 2.5% per payment.

In the event of a failed auto-payment due to insufficient funds, any tuition payments received after the 20th of the month will be subject to a late fee. The initial late fee of $75 will be charged on the 21st of the month. If payment is not received by the 25th, an additional fee of $50 will be imposed, for a total of $75. Repeated late payments may result in the discontinuation of enrollment.

Absent a written exception, tuition must be received prior to the 1st of any given month in order for your child to continue attending school that month. In cases of an unpaid tuition balance, we reserve the right at any time to require that the parents/guardians settle the remaining balance in full to maintain ongoing enrollment.

Checks returned by the bank will incur a processing fee in addition to the late fee.

No Tuition Refunds

Please note that Guidepost Montessori cannot issue tuition refunds under any circumstances, for any reason.

Re-enrollment

In order to accurately plan for our future programs, we ask parents to provide notice of re-enrollment for the upcoming academic year by our re-enrollment deadline. If you provide notice by this deadline, your child is guaranteed a spot in the program, we will waive the enrollment fee and you will maintain the child's current rate sheet. You may still re-enroll after the deadline has passed if spots are available, however, you will be required to pay the non-refundable enrollment fee and be subject to the tuition rates in effect for new families.

When you re-enroll your enrollment deposit "rolls forward" so you will not be asked to make an additional deposit payment. Please be aware that if you provide us with a notice of re-enrollment and then withdraw before the start of the new academic year, you forfeit your enrollment deposit, as well as any enrollment fee you may have paid for that upcoming academic year.

Withdrawal

If you choose to withdraw your child at any time, you are required to give official notice no later than the month prior to your child's final month. For the avoidance of ambiguity concerning withdrawals, the only method accepted for official withdrawal notice is your completion of our electronic withdrawal form, which will be provided by school leadership upon your request. The date on which you return the electronic withdrawal form will serve as your withdrawal notice date.

Your child's last day would then be the last academic day of the month that follows the month in which you give notice (e.g., if you give notice on April 17, your child's last day would be May 31). We do not pro-rate tuition for mid-month withdrawals and your child is entitled to attend school through the last academic day of their last month. Ordinarily, your enrollment deposit will be applied to tuition for your child's last month of school. Depending on the deposit and monthly tuition amounts, there may be either an amount refunded or an amount owed. If a refund is due, it will be issued within 30 days of the last academic day of your child's final month.

Dis-enrollment

Guidepost Montessori reserves the right, in its sole discretion, to discontinue the enrollment of any child, for any reason and at any time, with or without notice.

Non-Discrimination Policy

Guidepost Montessori does not discriminate on the basis of race, sex, national origin, disability, religion, or any other protected status. We make our best effort to accommodate the needs of every child who wishes to attend Guidepost Montessori. In the event that your child does have a disability or suspected disability, we will do a fully individualized assessment of your child in order to determine whether Guidepost Montessori possesses the necessary expertise and resources to provide for the best interests of your child, or, alternatively, whether the child may pose a health or safety threat to him/herself or others in our environment or require a fundamental alteration of our program.

This is to acknowledge that I have read and understood, and agree to abide by all terms, conditions, and policies of this Enrollment Form. I agree that these terms, conditions, and policies are a condition of my child's enrollment at Guidepost Montessori. I understand that my enrollment fee is non-refundable and that my enrollment deposit is only refundable in the rare case that Guidepost Montessori is not able to inform me of a start date within 6 months of submitting my enrollment deposit. I understand that the future start date may be outside of the 6-month window since very often parents are planning several months in advance.

☑ * I've read and agree to the above terms

* Printed Full Name

Celine Padly

* Signature

Next

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guidepost

Payment Details

* Full Name

Celine Padly

* Email

cpadly@gmail.com

Please enter your payment information below.

* Campus

Guidepost at Green Hills

* Subtotal

1,800.00

Proceed to Payment

Back

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May 2025						
S	M	T	W	T	F	S
27	28	29	30	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31
1	2	3	4	5	6	7

New Balance
$8,619.60
Minimum Payment Due
$86.00
Payment Due Date
05/06/25

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to $40.00 and your APR's will be subject to increase to a maximum Penalty APR of 29.99%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	20 years	$21,816
$322	3 years	$11,597 (Savings=$10,219)

If you would like information about credit counseling services, call 1-866-797-2885.

ACCOUNT SUMMARY

Account Number: XXXX XXXX XXXX 1588

Previous Balance	$5,190.36
Payment, Credits	-$7,997.48
Purchases	+$11,426.72
Cash Advances	$0.00
Balance Transfers	$0.00
Fees Charged	$0.00
Interest Charged	$0.00
New Balance	**$8,619.60**
Opening/Closing Date	03/10/25 - 04/09/25
Credit Access Line	$23,700
Available Credit	$15,080
Cash Access Line	$4,740
Available for Cash	$4,740
Past Due Amount	**$0.00**
Balance over the Credit Access Line	**$0.00**

MARRIOTT BONVOY BOUNDLESS POINTS

+ 6X Points on Marriott Hotel purchases	0
+2X Pts other spend Incl Grocery Gas Dining	22,854
+1X Addtl Pt on Grocery Gas Dining up to $6K	0
Total points transferred to Marriott	**22,854**

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Points add up quickly when you use your Marriott Bonvoy Boundless® Credit Card from Chase! Earn 6 points per $1 spent at participating Marriott Bonvoy® locations, 3 points per $1 on the first $6,000 spent in combined purchases annually on grocery store, gas station, and dining purchases, and 2 points per $1 spent on all other purchases. Also, enjoy guaranteed Silver Elite status and a Free Night Award every year after your anniversary.

0000001 FIS33339 C 2 0513 Y 9 09 25/04/09 Page 1 of 3 05056 MA MA 58151 09910000020005815101

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Make your payment at chase.com/paycard

Payment Due Date: **05/06/25**
New Balance: **$8,619.60**
Minimum Payment Due: **$86.00**

Account number: XXXX XXXX XXXX 1588

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Customer Service: 1-800-338-5960

Mobile: Download the Chase Mobile® app today

ACCOUNT ACTIVITY

Date of Transaction	Merchant Name or Transaction Description	$ Amount
PAYMENTS AND OTHER CREDITS		
03/31	Payment Thank You - Web	-3,247.50
03/31	Payment Thank You - Web	-4,749.98
PURCHASE		
03/09	UBER *EATS HELP.UBER.COM CA	[illegible]
03/08	TST*LADYBIRD TACO Nashville TN	
03/10	ATT* BILL PAYMENT 800-331-0500 TX	
03/10	Amazon.com*WY9FA66G3 Amzn.com/bill WA	
03/10	SWSTARS LLC 703-945-0408 TN	
03/10	AMAZON MKTPL*PW9O234B3 Amzn.com/bill WA	
03/10	UBER *EATS HELP.UBER.COM CA	
03/09	TST*E ROSE WEDGEWOOD Nashville TN	
03/10	SQ *OSA COFFEE MUSIC ROW Nashville TN	
03/11	Amazon Tips*P38EZ3PE3 Amzn.com/bill WA	
03/12	SMOKIN OAKS ORGANIC FARM NASHVILLE TN	
03/12	DD *DOORDASH CAVA 855-431-0459 CA	
03/13	SQ *OSA COFFEE MUSIC ROW Nashville TN	
03/13	THRIVE PLUS MEMBERSHIP THRIVEPETCARE TX	
03/13	CHEWY.COM 800-672-4399 FL	
03/13	Amazon Grocery Subscri 888-280-4331 WA	
03/15	DD *DOORDASH THECUPCAK 855-431-0459 CA	
03/14	Amazon.com*2C9MW4213 Amzn.com/bill WA	
03/15	DD *DOORDASH HAWKERSAS 855-431-0459 CA	
03/14	NETFLIX.COM 844-5052993 BC 03/15 CANADIAN DOLLAR 27.11 X 0.696421984 (EXCHG RATE)	[illegible]
03/16	FIRST WATCH - 0462 NASHVILLE TN	
03/15	PUBLIX #1665 NASHVILLE TN	
03/20	AMAZON MKTPL*924M018R3 Amzn.com/bill WA	
03/20	AT&T *PAYMENT 800-288-2020 FL	
03/21	IN *FABL DESIGN LLC 615-2431977 TN	
03/25	ICP*SafeSplash SwimLabs S 615-3340290 TN	
03/26	PELOTON* MEMBERSHIP ONEPELOTON.CO NY	
03/26	Amazon.com*D24Z76MX3 Amzn.com/bill WA	
03/27	DD *DOORDASH THEBAKEDB 855-431-0459 CA	
03/27	Amazon Tips*6P7HK1KB3 Amzn.com/bill WA	
03/27	AMAZON MKTPL*WQ9PF7ET3 Amzn.com/bill WA	
03/29	STATE FARM INSURANCE 800-956-6310 IL	
03/30	FIRST WATCH - 0462 NASHVILLE TN	
03/30	DD *DOORDASH DESANOPIZ 855-431-0459 CA	
03/31	INTUIT *TURBOTAX CL.INTUIT.COM CA	
04/01	Amazon.com*VS6ZZ5U73 Amzn.com/bill WA	
03/31	Amazon.com*007OW3RS3 Amzn.com/bill WA	[illegible]
03/31	WOMEN OBSTETRICS GYNECOL 615-3404655 TN	[illegible]
03/31	AMAZON MKTPL*434MD8XG3 Amzn.com/bill WA	29.62
04/02	GUIDEPOST MONTESSORI GUIDEPOSTMONT TX	1,800.00
04/01	Amazon Tips*HE5VE6JI3 Amzn.com/bill WA	10.00
04/02	GUIDEPOST MONTESSORI GUIDEPOSTMONT TX	1,400.00
04/03	PUBLIC STORAGE 27911 800-567-0759 TN	97.00
04/03	WOMEN OBSTETRICS GYNECOL 615-3404655 TN	[illegible]

EXHIBIT B

June 26, 2025 Email from Emma Broadfoot Confirming the $3,200 Refund Request and Support Ticket Number

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)

Gmail

Celine Padly <cpadly@gmail.com>

Refund Request Created

4 messages

Emma Broadfoot <ebroadfoot@guidepostmontessori.com> Thu, Jun 26, 2025 at 12:36 PM
To: Celine Padly <cpadly@gmail.com>

Hi, Celine,

Just wanted to give you the update that I have created the refund request for your VISA ending in *1588 for the amount of $3200 - This includes the registration ($400), and deposit ($1400 x2) for both children.

I will send another email when I get confirmation that this ticket has been completed. Thank you so much for your patience and understanding.

Warmly,

Emma Broadfoot
Head of School
Guidepost Montessori of Green Hills
615-292-9938
guidepostmontessori.com/greenhills
ebroadfoot@guidepostmontessori.com

"The most important period of life is not the age of university studies, but the first one, the period from birth to the age of six" —Dr. Maria Montessori

From: Higher Ground Education <helpdesk@highergroundeducation.freshservice.com>
Sent: Thursday, June 26, 2025 12:27 PM
To: Emma Broadfoot <ebroadfoot@guidepostmontessori.com>
Subject: Ticket Received - Request for Emma Broadfoot : Refund Request: Non-Withdrawal Refunds

Dear Emma,

We would like to acknowledge that we have received your request and a ticket has been created.
A support representative will be reviewing your request and will send you a personal response.(usually within 24 hours).

Request Summary

Refund Request: Non-Withdrawal Refunds

To view the status of the ticket or add comments, please visit
https://wayfinder.tohigherground.com/helpdesk/tickets/112686

Thank you for your patience.

Sincerely,
Customer Support Team

Manage your requests on our iOS and Android app.

Item Name	: Refund Request: Non-Withdrawal Refunds
Service Category	: Accounting / Finance
Type of refund requested	: Other (please describe below)
Please describe the refund requested	: Campus closing - Future enrollments, needs refund of deposit and registration fees
Region	: Southeast
School	: Green Hills
Parent/account-holder's name(s)	: Celine Padly
Child's name	: Wesley McMurrich & Baby McMurrich
Amount of refund requested	: 3200.0
Method used to make original payment	: Stripe (credit card)
Stripe ID (ch_...) from Salesforce, or last three digits of credit card used	: 588
Anything else we should know?	: Campus is closing

Celine Padly <cpadly@gmail.com> Thu, Jun 26, 2025 at 12:38 PM
To: Emma Broadfoot <ebroadfoot@guidepostmontessori.com>

Thank you Emma for the update. Much appreciated.

All the best,

Celine
[Quoted text hidden]
—
Celine Padly
cpadly@gmail.com
T: 615-640-2553

Celine Padly <cpadly@gmail.com> Thu, Jul 31, 2025 at 12:46 PM
To: Emma Broadfoot <ebroadfoot@guidepostmontessori.com>

Hi Emma,

Hope you are well. I have yet to receive my deposit refund. Do you have an update?
Thank you,

Celine
[Quoted text hidden]

Celine Padly <cpadly@gmail.com> Tue, Aug 5, 2025 at 12:10 PM
To: Emma Broadfoot <ebroadfoot@guidepostmontessori.com>, swestmoreland@tohigherground.com

Hi Emma,

Celine Padly <cpadly@gmail.com> Tue, Aug 5, 2025 at 12:10 PM
To: Emma Broadfoot <ebroadfoot@guidepostmontessori.com>, swestmoreland@tohigherground.com

Hi Emma,

Looping back - please share an update on our refund. Thank you,

Celine
[Quoted text hidden]

EXHIBIT C

Copy of the Official Form 410 Proof of Claim

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)

The completed and signed Official Form 410 (Proof of Claim), as mailed August 5, 2025, follows this page (reproduced as images from the filed form; replace with a cleaner scan if you have one).

Fill in this information to identify the case:

Debtor 1: Higher Ground Education, Inc., et al.

Debtor 2 (Spouse, if filing):

United States Bankruptcy Court for the: Northern District of Texas

Case number: 25-80121

Official Form 410

Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?

Celine Padly
Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor

2. Has this claim been acquired from someone else?

☑ No
☐ Yes. From whom?

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Celine Padly (Name)	Celine Padly (Name)
1403 11th Avenue South (Number Street)	1403 11th Avenue South (Number Street)
Nashville TN 37203 (City State ZIP Code)	Nashville TN 37203 (City State ZIP Code)
Contact phone 615 540 2553	Contact phone 615 540 2553
Contact email CPADLY@GMAIL.COM	Contact email CPADLY@GMAIL.COM

Uniform claim identifier (if you use one):

4. Does this claim amend one already filed?

☑ No
☐ Yes. Claim number on court claims registry (if known) _____ Filed on ____ / ____ / ____ (MM / DD / YYYY)

5. Do you know if anyone else has filed a proof of claim for this claim?

☑ No
☐ Yes. Who made the earlier filing?

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?**
- ☐ No
- ☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ ____ ____ ____

7. **How much is the claim?** $ 3,200.00 **Does this amount include interest or other charges?**
- ☑ No
- ☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?**

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.

Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).

Limit disclosing information that is entitled to privacy, such as health care information.

Refund for registration and deposit for 2 children who had not started

9. **Is all or part of the claim secured?**
- ☑ No
- ☐ Yes. The claim is secured by a lien on property.

Nature of property:
- ☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim.*
- ☐ Motor vehicle
- ☐ Other. Describe: _____

Basis for perfection: _____

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: $_____

Amount of the claim that is secured: $_____

Amount of the claim that is unsecured: $_____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: $_____

Annual Interest Rate (when case was filed) _____%
- ☐ Fixed
- ☐ Variable

10. **Is this claim based on a lease?**
- ☑ No
- ☐ Yes. **Amount necessary to cure any default as of the date of the petition.** $_____

11. **Is this claim subject to a right of setoff?**
- ☑ No
- ☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.	☐ No ☑ Yes. Check one:	Amount entitled to priority
	☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	$
	☑ Up to $3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	$ 3,200.00
	☐ Wages, salaries, or commissions (up to $15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	$
	☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	$
	☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	$
	☐ Other. Specify subsection of 11 U.S.C. § 507(a)(__) that applies.	$

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to $500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☑ I am the creditor.
- ☐ I am the creditor's attorney or authorized agent.
- ☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- ☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/05/2025
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name	Celine Elodie Padly		
	First name	Middle name	Last name
Title	Creditor		
Company	n/a		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	1403 11th Avenue South		
	Number Street		
	Nashville	TN	37203
	City	State	ZIP Code
Contact phone	615 540 2553	Email	CPADLY@GMAIL.COM

EXHIBIT D

Notification of Guidepost Montessori of Green Hills Sale, Offer for a Refund from the School, and Request for a Refund Update

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)

Gmail

Celine Padly <cpadly@gmail.com>

Follow-Up: Guidepost at Green Hills Transition Announcement & Next Steps

8 messages

Liz Gomez Cruz <lgomezcruz@tohigherground.com> Wed, May 14, 2025 at 5:04 AM
To: "cpadly@gmail.com" <cpadly@gmail.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>

Dear Parents,

Thank you for your continued support and patience as we navigate this transition together.

To ensure a smooth process, we aim to collect your decision on continued enrollment at Guidepost at Green Hills as quickly as possible. This will allow us to efficiently allocate refunds and deposits.

Please take a moment to complete this brief survey to share your family's decision and timing. Your prompt response is greatly appreciated.

We kindly request that you submit the survey by Wednesday, May 21st, so that we can update all accounts by the end of May.

Click here to take the survey

We will continue to keep you updated every step of the way as we work through this process. Please don't hesitate to reach out with any questions as you have them.

Sincerely,
Guidepost Team

Liz Gomez Cruz <lgomezcruz@tohigherground.com> Wed, May 14, 2025 at 5:08 AM
To: "cpadly@gmail.com" <cpadly@gmail.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>

[Quoted text hidden]

Celine Padly <cpadly@gmail.com> Wed, May 14, 2025 at 9:44 AM
To: Liz Gomez Cruz <lgomezcruz@tohigherground.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>

Hello Liz,

I am unaware of any announcement made regarding a transition. I did not receive any communications from the school. Can you please provide more context so I understand what this survey is about and what decision I'm being asked to make?

Regards,

Celine
[Quoted text hidden]
--
Celine Padly
cpadly@gmail.com
T: 615-540-2553

Liz Gomez Cruz <lgomezcruz@tohigherground.com> Fri, May 16, 2025 at 9:06 AM

To: Celine Padly <cpadly@gmail.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>, Stephen Demers <Stephen.Demers@kindercare.com>, Sara Priest <Sara.Priest@kindercare.com>

Hi Celine,

Thank you for reaching out, and I truly appreciate your patience.

I want to sincerely apologize that you didn't receive the communication about the transition at Green Hills. I understand your family is registered to start with us next year, and I'm so sorry for any confusion or concern this may have caused.

To share a bit more context: after exploring every possible option to continue operations, Guidepost Montessori at Green Hills will be transitioning to a new operator, KinderCare, at the end of June. Our last day of operations will be June 27, 2025. This decision was not made lightly, and we know how unsettling unexpected changes like this can be, specially when you're preparing to join a new school community.

We sent out a survey to help us understand whether families wish to continue with the new provider or prefer to withdraw. Since your child has not yet started, we'll move forward with issuing a refund of your deposit.

If you'd like to learn more about KinderCare and their plans for the campus, you're warmly invited to reach out directly to their team:

- **Stephen Demers** – Stephen.Demers@kindercare.com
- **Sara Priest** – Sara.Priest@kindercare.com

They'll be happy to answer any questions and share what's ahead for the program and community.

Again, I'm so sorry that this news was not communicated to you sooner. Please don't hesitate to reach out if there's anything else I can do to support you through this change.

Warmly,

HIGHER GROUND EDUCATION

Liz Gómez
Regional Operations Lead, Southeast
Higher Ground Education
lgomezcruz@tohigherground.com
tohigherground.com

Book time to meet with me

From: Celine Padly <cpadly@gmail.com>
Sent: Wednesday, May 14, 2025 10:44 AM
To: Liz Gomez Cruz <lgomezcruz@tohigherground.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>
Subject: Re: Follow-Up: Guidepost at Green Hills Transition Announcement & Next Steps

[Quoted text hidden]

Stephen Demers <Stephen.Demers@kindercare.com> Fri, May 16, 2025 at 9:27 AM
To: Celine Padly <cpadly@gmail.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>, Sara Priest <Sara.Priest@kindercare.com>, Liz Gomez Cruz <lgomezcruz@tohigherground.com>

Hi Celine,

I want to ensure you connect with the most appropriate people to answer your questions. We have a great support team who can connect with you.

- KinderCare Enrollment Center, enrollnow@kindercare.com, (951)451-4091
- Sarah Thomas, District Leader, Sarah.Thomas@KinderCare.com

If you share the name of your child, I can also ensure that you are included on all future communication from KinderCare.

Regards,

Stephen

[Quoted text hidden]

Celine Padly <cpadly@gmail.com> Fri, May 16, 2025 at 11:02 AM
To: Liz Gomez Cruz <lgomezcruz@tohigherground.com>

Thank you Liz, I was also able to speak to Emma who shared some context. We are set on a Montessori approach, so while I appreciate the connection to Kindercare leadership - we will be proceeding with an alternate option.
Can you confirm that our refund will also include the $400 enrollment fee, since Guidepost is effectively 'closing operations' within weeks of our enrollment?

Thank you,

Celine
[Quoted text hidden]

Celine Padly <cpadly@gmail.com> Fri, May 16, 2025 at 11:03 AM
To: Stephen Demers <Stephen.Demers@kindercare.com>
Cc: Guidepost Green Hills Leadership <greenhills-leadership@guidepostmontessori.com>, Sara Priest <Sara.Priest@kindercare.com>, Liz Gomez Cruz <lgomezcruz@tohigherground.com>

Thank you Stephen, appreciate the information. As for right now, we'd like to continue pursuing a Montessori school and its my understanding that KinderCare is not a Montessori school - so we will not be proceeding with enrollment at this time.
Best of luck as you begin new operations in Green Hills.

All the best,

Celine
[Quoted text hidden]

Stephen Demers <Stephen.Demers@kindercare.com> Fri, May 16, 2025 at 12:49 PM
To: Celine Padly <cpadly@gmail.com>

Thank you for sharing, Celine. Best of luck to you and your child.

[Quoted text hidden]

Gmail Celine Padly <cpadly@gmail.com>

Refund still not received - Guidepost Green Hills

1 message

Celine Padly <cpadly@gmail.com> Tue, Aug 5, 2025 at 11:40 AM
To: Liz Gomez Cruz <lgomezcruz@tohigherground.com>

Hi Liz,

We were impacted by the closing of Guidepost Green Hills. In June, Emma Broadfoot confirmed that a refund request was submitted to get our enrollment refunded.

She confirmed that it will include:
Just wanted to give you the update that I have created the refund request for your VISA ending in *1588 for the amount of $3200 - This includes the registration ($400), and deposit ($1400 x2) for both children.

She also shared this ticket link. To view the status of the ticket or add comments, please visit https://wayfinder.tohigherground.com/helpdesk/tickets/112686

We still have not received a refund. I reached out to Emma but have not heard back.
Can you please provide an update?

Thank you,
Celine

--
Celine Padly
cpadly@gmail.com
T: 615-540-2553

EXHIBIT E

Signed Statement Describing the January 14, 2026 Phone Call Confirming My Address for the Refund

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)

STATEMENT OF CELINE ELODIE PADLY
REGARDING THE JANUARY 14, 2026 TELEPHONE CALL

I, Celine Elodie Padly, declare as follows:

1. I am the creditor identified in DRC Claim No. 531 in the Chapter 11 bankruptcy case of Higher Ground Education, Inc., Case No. 25-80121 (MVL), pending in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division.

2. On or about January 14, 2026, I received an unsolicited telephone call from a person, Liz, identifying themselves as connected to the processing of refund claims related to Higher Ground Education, Inc. and/or its claims agent.

3. I have a recording of the initial voicemail that says: "Hello Celine, this is Liz from Guidepost Montesorri. I was calling you -- our Finance team is working on overdue refunds and your family is part of this list and we wanted to confirm the address before issuing the refund. So, feel free to give me a call back to 919-299-9729. I hope you have an amazing rest of your day. Bye bye"

4. I called back on the same day.

5. During that call, the caller asked me to confirm and validate my current mailing address – 1403 11th Avenue South, Nashville, TN 37203 – for the purpose of issuing a refund payment to me.

6. The caller told me that a refund would be issued to me at that address within the next few months.

7. I do not have a recording of this call. This statement is based on my clear and specific recollection of it, made and reviewed shortly after the events described.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

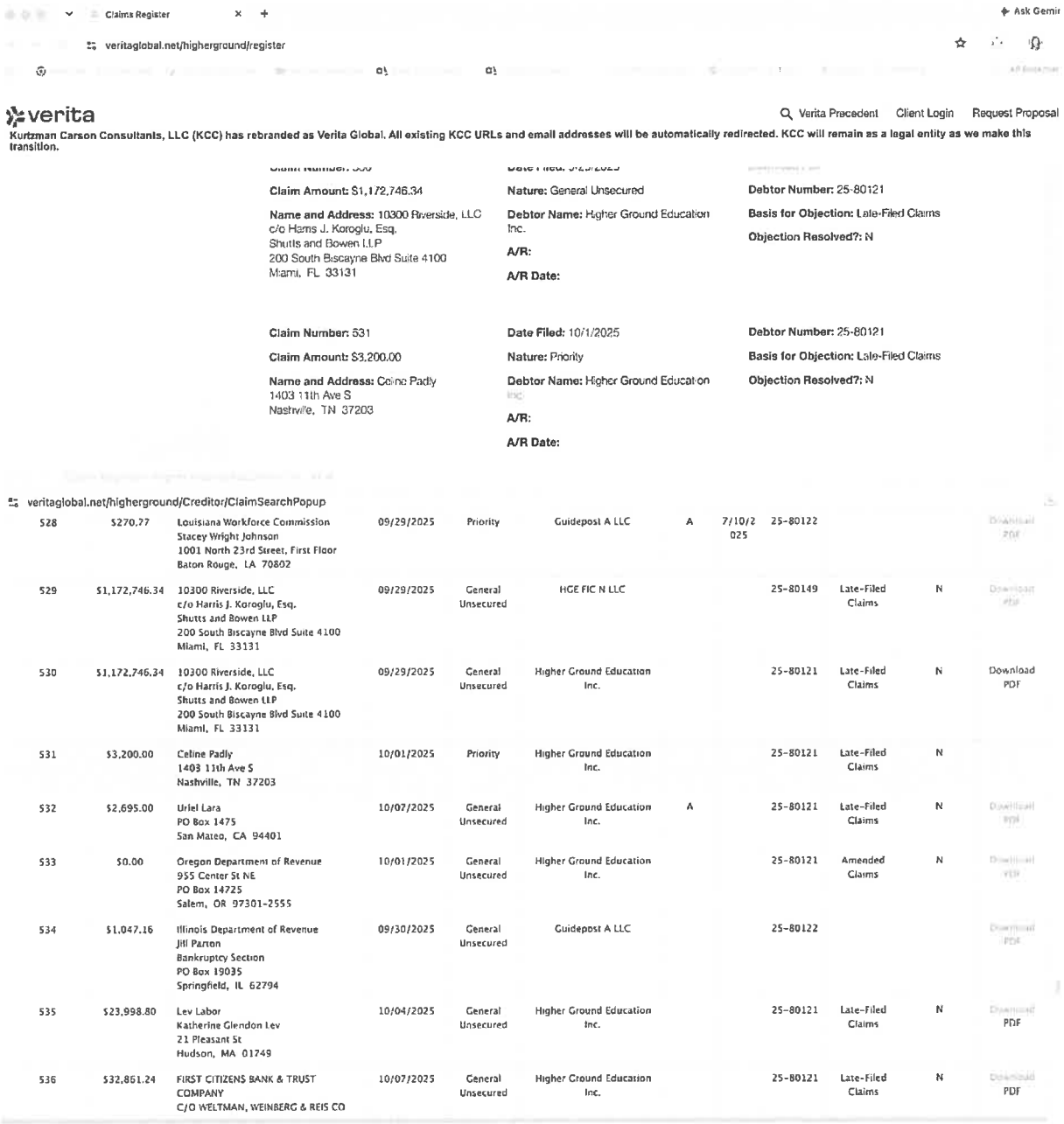
Executed on: _____

_____
Celine Elodie Padly

EXHIBIT F

Copy/Screenshot of DRC Claim No. 531 from the Verita Claims Register

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)



Claims Register

veritaglobal.net/highergrround/register

verita

Verita Precedent Client Login Request Proposal

Kurtzman Carson Consultants, LLC (KCC) has rebranded as Verita Global. All existing KCC URLs and email addresses will be automatically redirected. KCC will remain as a legal entity as we make this transition.

Claim Amount: $1,172,746.34

Name and Address: 10300 Riverside, LLC
c/o Harris J. Koroglu, Esq.
Shutts and Bowen LLP
200 South Biscayne Blvd Suite 4100
Miami, FL 33131

Nature: General Unsecured

Debtor Name: Higher Ground Education Inc.

A/R:

A/R Date:

Debtor Number: 25-80121

Basis for Objection: Late-Filed Claims

Objection Resolved?: N

Claim Number: 531

Claim Amount: $3,200.00

Name and Address: Celine Padly
1403 11th Ave S
Nashville, TN 37203

Date Filed: 10/1/2025

Nature: Priority

Debtor Name: Higher Ground Education Inc.

A/R:

A/R Date:

Debtor Number: 25-80121

Basis for Objection: Late-Filed Claims

Objection Resolved?: N

veritaglobal.net/highergrround/Creditor/ClaimSearchPopup

528	$270.77	Louisiana Workforce Commission Stacey Wright Johnson 1001 North 23rd Street, First Floor Baton Rouge, LA 70802	09/29/2025	Priority	Guidepost A LLC	A	7/10/2025	25-80122			Download PDF
529	$1,172,746.34	10300 Riverside, LLC c/o Harris J. Koroglu, Esq. Shutts and Bowen LLP 200 South Biscayne Blvd Suite 4100 Miami, FL 33131	09/29/2025	General Unsecured	HGE FIC N LLC			25-80149	Late-Filed Claims	N	Download PDF
530	$1,172,746.34	10300 Riverside, LLC c/o Harris J. Koroglu, Esq. Shutts and Bowen LLP 200 South Biscayne Blvd Suite 4100 Miami, FL 33131	09/29/2025	General Unsecured	Higher Ground Education Inc.			25-80121	Late-Filed Claims	N	Download PDF
531	$3,200.00	Celine Padly 1403 11th Ave S Nashville, TN 37203	10/01/2025	Priority	Higher Ground Education Inc.			25-80121	Late-Filed Claims	N	
532	$2,695.00	Uriel Lara PO Box 1475 San Mateo, CA 94401	10/07/2025	General Unsecured	Higher Ground Education Inc.	A		25-80121	Late-Filed Claims	N	Download PDF
533	$0.00	Oregon Department of Revenue 955 Center St NE PO Box 14725 Salem, OR 97301-2555	10/01/2025	General Unsecured	Higher Ground Education Inc.			25-80121	Amended Claims	N	Download PDF
534	$1,047.16	Illinois Department of Revenue Jill Parton Bankruptcy Section PO Box 19035 Springfield, IL 62794	09/30/2025	General Unsecured	Guidepost A LLC			25-80122			Download PDF
535	$23,998.80	Lev Labor Katherine Glendon Lev 21 Pleasant St Hudson, MA 01749	10/04/2025	General Unsecured	Higher Ground Education Inc.			25-80121	Late-Filed Claims	N	Download PDF
536	$32,861.24	FIRST CITIZENS BANK & TRUST COMPANY C/O WELTMAN, WEINBERG & REIS CO	10/07/2025	General Unsecured	Higher Ground Education Inc.			25-80121	Late-Filed Claims	N	Download PDF

EXHIBIT G

My Signed Statement: I Never Received Bankruptcy Notice or Notice of the August 7, 2025 Claims Bar Date

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)

STATEMENT OF CELINE ELODIE PADLY
REGARDING LACK OF BANKRUPTCY NOTICE

I, Celine Elodie Padly, declare as follows:

1. I am the creditor identified in DRC Claim No. 531 in the Chapter 11 bankruptcy case of Higher Ground Education, Inc., Case No. 25-80121 (MVL), pending in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division.

2. I enrolled my children at Guidepost Montessori of Green Hills on April 11, 2025, and was a known creditor of the Debtor by no later than June 26, 2025, when Guidepost Montessori of Green Hills / Higher Ground Education, Inc. confirmed by email that it owed me a $3,200.00 refund and opened a support ticket (No. 112686) to process it.

3. At all relevant times, my correct mailing address was 1403 11th Avenue South, Nashville, TN 37203, and my correct email address was cpadly@gmail.com. This information did not change.

4. I never received, by mail, email, or any other means, any notice from Higher Ground Education, Inc., any of its representatives, the Bankruptcy Court, or any claims agent stating that a bankruptcy case had been filed or that August 7, 2025 was the deadline (the "bar date") to file a proof of claim.

5. I first learned of the bankruptcy on my own, through an independent internet search, on August 5, 2025, after being unable to reach anyone by phone regarding my pending refund.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: _____

_____
Celine Elodie Padly

EXHIBIT H

Records of September 17, 18, and 22, 2026 Email and Phone Outreach to Amber Carson, Jason Brookner, Aaron Kaufman, and Emily Shanks Seeking Consensual Resolution

Higher Ground Education, Inc., Case No. 25-80121 (MVL) — DRC Claim No. 531 (Celine Elodie Padly)

Gmail **Celine Padly <cpadly@gmail.com>**

Higher Ground Education - Consensual Resolution Request

5 messages

Celine Padly <cpadly@gmail.com> Thu, Sep 17, 2026 at 2:13 PM
To: acarson@grayreed.com

Hello,

I'm reaching out as I received notice that my claim for the Higher Ground Education is being objected to. I'd like to discuss options under a consensual resolution.

Please contact me at 615-540-2553 or at this email address.
Thank you,

Celine Padly

--
Celine Padly
cpadly@gmail.com
T: 615-540-2553

Celine Padly <cpadly@gmail.com> Fri, Sep 18, 2026 at 10:48 AM
To: acarson@grayreed.com

Hi Amber,

I've left a voicemail this morning with more details. My claim number is #531; proof of claim is attached and dated August 5, 2025. August 5th was the day I learned of the bankruptcy (by my own account after no response from Guidepost for months) and so I was unable to submit a claim any sooner than that. As you'll see, I attempted another reach out via email (after leaving several voicemails) on August 5th; at that time, I decided to Google and see if there were any news about Guidepost since I was not getting a reply. That is when I learned of the Ch. 11 bankruptcy and had to look up how I could file a claim. My claim was mailed that same day and it should have arrived within 2-3 days; the docket reflects a delay in processing my claim which would be out of my hands by the receiving law firm. I have copies of my receipts also attached to this email, and the exchanges with Guidepost and Higher Ground Education identifying me as a creditor *before* they filed bankruptcy. They failed to notify me of the bankruptcy, impacting my ability to follow due process until I did my own google research after failed attempts to get an update on my refund ($3,200).

Please contact me today or Monday to discuss further my options for consensual resolution. Thank you,

Celine Padly
[Quoted text hidden]

3 attachments

Proof of Claim - Padly Celine 531.pdf
4265K

Padly Claim 531.zip
2849K

Gmail - Refund still not received - Guidepost Green Hills.pdf
144K

Celine Padly <cpadly@gmail.com> Tue, Sep 22, 2026 at 9:47 AM
To: acarson@grayreed.com
Cc: jbrookner@grayreed.com, akaufamn@grayreed.com, eshanks@grayreed.com

Hi Amber,

I'm following up on my request to discuss consensual resolution for Higher Ground Education LLC's bankruptcy and objection to my claim. My last email from Friday provided proof of my pending refund prior to bankruptcy, which indicates I was a known creditor who was not notified of the bankruptcy. I found out about the bankruptcy on my own account after many failed attempts to receive an update regarding my refund. I filed my claim as soon as possible on August 5th, 20225 via USPS, which is when I learned of the bankruptcy and process to submit a claim. I received confirmation from Higher Ground Education by phone on June 26, 2026 that I would be receiving my refund by claim - thus acknowledging my claim. I am now asking to engage in discussion to align on a resolution.

I've reached out via email and phone last week but have not heard back. Please let me know if we can connect today.

Thank you,

Regards,

Celine Padly
[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com> Tue, Sep 22, 2026 at 9:48 AM
To: cpadly@gmail.com



Address not found

Your message wasn't delivered to **akaufamn@grayreed.com** because the address couldn't be found, or is unable to receive mail.

LEARN MORE
⚠*This link will take you to a third-party site*

The response from the remote server was:

```
550 Invalid Recipient - https://community.mimecast.com/docs/DOC-1369#550 [y8NNmit0N-
eEQDY39f5Gvg.us609]
```

Final-Recipient: rfc822; akaufamn@grayreed.com
Action: failed
Status: 5.1.1
Remote-MTA: dns; us-smtp-inbound-2.mimecast.com. (170.10.128.141, the server
for the domain grayreed.com.)
Diagnostic-Code: smtp; 550 Invalid Recipient - https://community.mimecast.com/docs/DOC-1369#550 [y8NNmit0N-eEQDY39f5Gvg.us609]
Last-Attempt-Date: Tue, 22 Sep 2026 07:48:02 -0700 (PDT)

noname
5K

Celine Padly <cpadly@gmail.com> Tue, Sep 22, 2026 at 9:56 AM
To: akaufman@grayreed.com

Please see below for my request to engage in consensual resolution.
[Quoted text hidden]

Amber M. Carson <acarson@grayreed.com> Tue, Sep 22, 2026 at 10:08 AM
To: Celine Padly <cpadly@gmail.com>
Cc: "Jason S. Brookner" <jbrookner@grayreed.com>, Aaron Kaufman <akaufman@grayreed.com>, Emily Shanks <eshanks@grayreed.com>

Good morning, Celine,

Thank you for following up. We are looking into this and will revert.

Amber M. Carson
Partner
Tel 469.320.6199 | Fax 469.320.6916 | acarson@grayreed.com
1845 Woodall Rodgers Fwy., Suite 1300 | Dallas, TX 75201
grayreed.com | Connect with me on LinkedIn

GRAY REED

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[Quoted text hidden]

Celine Padly <cpadly@gmail.com> Tue, Sep 22, 2026 at 10:37 AM
To: "Amber M. Carson" <acarson@grayreed.com>

Thank you Amber for your acknowledgement. A small correction on my last email, I meant to say I received a call on January 26, 2026 (not June) requesting validation of my home address to mail me my refund.

I look forward to hearing from you.

Regards,

Celine
[Quoted text hidden]