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ATTORNEYS FOR 6575 OAKWOOD BLVD LLC

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.	§	

RESPONSE TO LIQUIDATING TRUSTEE'S FIRST OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (DUPLICATE AND AMENDED CLAIMS)

6575 Oakwood Blvd LLC creditor (the "Creditor" or "Oakwood"), files this *Response to Liquidating Trustee's First Omnibus Objection to Certain Proofs of Claims (Duplicate and Amended Claims)* (Docket No. 931) filed herein by John P. Madden, Trustee of the HGE Liquidating Trust ("Madden"), and shows:

1. Oakwood timely filed Claim No. 411 against Guidepost A LLC who was the tenant on a commercial lease.

2. Oakwood timely filed Claim No. 409 against Higher Ground Education, Inc. who guaranteed the lease.

3. The Liquidating Trustee's objection seeks disallowance of Claim No. 411 as duplicative of Claim No. 409.

4. Oakwood's two claims are not duplicative where they are asserted against two different debtors. The lease and guaranty make each debtor fully liable for the entire debt. The confirmed plan

[1] This case is administered with others, including *In re Guidepost A, LLC*, Case

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identifies sources for plan distributions. *See* Plan Sec. 4.1. Oakwood's right to receive distributions should not be eliminated or reduced by eliminating Guidepost A LLC's liability and whatever rights it had or has in the sources of consideration for plan distributions.

5. Oakwood included a reservation of rights in each of its claims – 409 and 411. Oakwood incorporates that language by reference into this response.

6. The Liquidating Trustee' objection reserves his right to file additional objections. Oakwood reserves its right to file additional oppositions to any objection.

Dated: October 5, 2026

Respectfully submitted:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on October 5, 2026 by electronic notice to all ECF users who have appeared in this case to date.

/s/ Jared T.S. Pace
JARED T.S. PACE