IN THE UNITED STATES BANKRUPTCY COURT

FOR THE NORTHERN DISTRICT OF TEXAS

DALLAS DIVISION

IN RE:

HIGHER GROUND EDUCATION, INC., *et al.,*

Debtors.

CHAPTER 11

CASE NO. 25-80121 (MVL)

(Jointly Administered)

MOTION OF 34 MADISON GP INC. FOR ALLOWANCE OF LATE-FILED PROOFS OF CLAIM AND ALLOWANCE OF CLAIMS PURSUANT TO FED. R. BANKR. P. 3003(c)(3) AND 9006(b)(1)

34 Madison GP Inc. ("**Creditor**"), as general partner of 34 Madison LP, by and through its undersigned counsel, hereby files this Motion (the "**Motion**") for an Order pursuant to Rules 3003(c)(3) and 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**") granting allowance of its late-filed Proofs of Claim. In support of this Motion, Creditor respectfully represents as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334.

2. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (B).

3. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

II. BACKGROUND AND FACTS

4. On June 17, 2025, Higher Ground Education, Inc. and certain of its affiliates filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "**Bankruptcy Code**"). The cases were designated as complex Chapter 11 cases, and the Court entered the Order Granting Chapter 11 Complex Case Treatment on June 20, 2025 [Docket No. 55], establishing complex case procedures for these jointly administered proceedings.