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)

DECLARATION OF AARON YICK IN SUPPORT OF MOTION OF 34 MADISON GP INC. FOR ALLOWANCE OF LATE-FILED PROOFS OF CLAIM

I, AARON YICK, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Vice-President and a Director of 34 Madison GP Inc. ("**34 Madison**"), the general partner of 34 Madison LP. 34 Madison is a creditor in the above-captioned Chapter 11 cases. Except as otherwise indicated, I have personal knowledge of the facts stated herein, including through my review of 34 Madison's business records maintained in the ordinary course, and, if called as a witness, could and would testify competently thereto.

2. I make this declaration in support of the Motion of 34 Madison for Allowance of Late-Filed Proofs of Claim Pursuant to Fed. R. Bankr. P. 3003(c)(3) and 9006(b)(1) (the "**Motion**") filed concurrently herewith. Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

3. 34 Madison is the landlord under a lease agreement dated October 1, 2021 (the "**Lease**") with Guidepost Montessori Canada ULC (the "**Tenant**") for premises located at 34 Madison Avenue, Toronto, Ontario. Higher Ground Education Inc. and HGE Canada Holdings ULC served as indemnifiers (together, the "**Indemnifiers**") under the Lease and related indemnity agreements.

4. 34 Madison's claims, in the aggregate amount of $600,000.00, include $156,233.12 of unpaid Additional Rent for December 2024 and three months' accelerated Rent, including