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Counsel to Ramandeep Girn and Rebecca Girn

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

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In re:

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

Chapter 11

Case No. 25-80121-11 (MVL)

Debtors

(Joint Administration Requested)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PLEADINGS

PLEASE TAKE NOTICE that Ramandeep ("Ray") Girn and Rebecca Girn (the "Girns")

hereby appear in the above-captioned cases through its counsel Dentons US LLP ("Dentons") and,

pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §

1109(b), request that copies of all notices given or required to be given in these cases or any related



¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal identification number, are: Higher Ground Education Inc. (7265); Guidepost A LLC (8540); Prepared Montessorian LLC (6181); Terra Firma Services LLC (6999); Guidepost Birmingham LLC (2397); Guidepost Bradley Hills LLC (2058); Guidepost Branchburg LLC (0494); Guidepost Carmel LLC (4060); Guidepost FIC B LLC (8609); Guidepost FIC C LLC (1518); Guidepost Goodyear LLC (1363); Guidepost Las Colinas LLC (9767); Guidepost Leawood LLC (3453); Guidepost Muirfield Village LLC (1889); Guidepost Richardson LLC (7111); Guidepost South Riding LLC (2403); Guidepost St Robert LLC (5136); Guidepost The Woodlands LLC (6101); Guidepost Walled Lake LLC (9118); HGE FIC D LLC (6499); HGE FIC E LLC (0056); HGE FIC F LLC (8861); HGE FIC G LLC (5500); HGE FIC H LLC (8817); HGE FIC I LLC (1138); HGE FIC K LLC (8558); HGE FIC L LLC (2052); HGE FIC M LLC (8912); HGE FIC N LLC (6774); HGE FIC O LLC (4678); HGE FIC P LLC (1477); HGE FIC Q LLC (3122); HGE FIC R LLC (9661); LePort Emeryville LLC (7324); AltSchool II LLC (0403). The Debtors' mailing address is 1321 Upland Dr. PMB 20442, Houston, Texas 77043.

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adversary proceedings and copies of all papers served or required to be served in these cases or related proceedings be given and served upon:

> DENTONS US LLP Clay M. Taylor Texas Bar No. 24033261 John D. Beck Texas Bar No. 24073898 100 Crescent Court, Suite 900 Dallas, TX 75201-1858 Telephone: (214) 647-2496 Email: <u>clay.taylor@dentons.com</u> john.beck@dentons.com

PLEASE TAKE FURTHER NOTICE that this request for notice includes copies of all papers, including, but not limited to, filed reports, pleadings, motions, applications, petitions, notices, statements, replies, schedules, proposed plans, disclosure statements, briefs, and any responding papers filed in these cases or any related proceedings and that such notice, unless otherwise directed by the Court or the Girns, be made via email to the persons listed above.

PLEASE TAKE FURTHER NOTICE that the Girns intend that neither this Notice of Appearance nor any other filing or claim shall waive (1) the right to have final orders in non-core matters entered only after de novo review by the United States District Court for the Northern District of Texas (the "<u>District Court</u>"), (2) the right to trial by jury in any proceeding so triable in these cases or any other matter, controversy, or proceeding related to these cases, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, remedies, set-offs, or recoupments to which the Girns is or may be entitled to assert under agreements, at law, or in equity, with all of the foregoing being expressly preserved. Additionally, nothing herein shall be deemed or construed as a consent to jurisdiction of matters congressionally delegated to regulatory authorities.

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PLEASE TAKE FURTHER NOTICE that the aforementioned attorneys request that they be added to the Court's service matrix for notice of all contested matters, adversary proceedings, and other proceedings in these cases.

Dated: June 18, 2025

DENTONS US LLP

By: /s/ Clay M. Taylor Clay M. Taylor Texas Bar No. 24033261 John D. Beck Texas Bar No. 24073898 100 Crescent Court, Suite 900 Dallas, TX 75201-1858 Telephone: (214) 647-2496 Email: <u>clay.taylor@dentons.com</u> john.beck@dentons.com

Counsel to Ramandeep Girn and Rebecca Girn

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 18, 2025, he caused a copy of the foregoing Notice of Appearance and Request for Service of Notices and Pleadings to be served upon all registered parties via the Court's CM/ECF electronic filing system.

<u>/s/ Clay M. Taylor</u> Clay M. Taylor