Docket #0952 Date Filed: 10/02/2026

SHUYUAN HU
8 S Old Ranch Rd
Arcadia, California 91007
Telephone: (929) 855-6633
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Creditor, appearing pro se

FILED
OCT 02 2026
CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

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

In re:§Chapter 11
§
HIGHER GROUND EDUCATION, INC.,§Case No. 25-80121 (MVL)
§
Reorganized Debtor.§(Jointly Administered)
§

RESPONSE OF SHUYUAN HU TO THE LIQUIDATING TRUSTEE'S SECOND OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (LATE-FILED CLAIMS) [DOCKET NO. 932], AND MOTION TO DEEM CLAIM NO. 577 TIMELY FILED

TO THE HONORABLE MICHELLE V. LARSON, UNITED STATES BANKRUPTCY JUDGE:

Shuyuan Hu ("Claimant"), an individual creditor appearing pro se, respectfully submits this Response to the Liquidating Trustee's Second Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims) [Docket No. 932] (the "Objection"), solely as it relates to Claim No. 577 filed against HGE FIC E LLC, and in support states as follows:

I. PRELIMINARY STATEMENT

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1. Paragraph 18 of the Objection asserts that "[t]he Claimants listed on Schedule 1 received proper notice of the General Bar Date and Governmental Bar Date." As to Claimant, that assertion is incorrect.

2. Claimant invested $500,000 in Debtor HGE FIC E LLC in 2019 through a Shanghai-based immigration intermediary in connection with an EB-5 immigrant investor petition. He is identified in the Debtors' own bankruptcy filings as the holder of a three percent (3%) Series B Member interest in HGE FIC E LLC. Claimant executed subscription paperwork with HGE FIC E LLC in 2019, which the intermediary prepared and presented to him. Apart from signing those documents, Claimant has never communicated with any Debtor, and no Debtor has ever communicated with him. He has never received a Schedule K-1 from HGE FIC E LLC in any year, notwithstanding that a limited liability company is required to furnish one annually to a member holding a 3% interest. The only information he has ever obtained concerning his investment was two spreadsheets forwarded to him by the intermediary's representative on March 29, 2025, and then only because he asked for them.

3. Counsel to the Liquidating Trustee has confirmed in writing that the Notice of Deadline to File Proof of Claim was mailed to Claimant on June 27, 2025 (see Docket No. 160, Exhibit E, at page 111 of 265) at the following address:

> "Hu Shuyuan, Villa 53 Shanshui Qiancheng Mension, GUIZHOU PROVINCE, Guiyang City, China"

4. Claimant moved away from that address in 2021 — four years before the mailing. He relocated to California on April 21, 2021 and has resided at 8 S Old Ranch Rd, Arcadia, California 91007 continuously since that date, including throughout June, July, and August 2025. That is the same address that appears on his Proof of Claim and on Schedule 1 to the proposed Order attached to the Objection.

5. The Guiyang address was Claimant's residence in 2018 and 2019, and it appears on the subscription paperwork he executed at that time. It was accurate when given. Claimant left that address on April 21, 2021. In the six years between the investment and the Petition Date, the Debtors never once used that address — or any other means — to communicate with Claimant. They never sent him a Schedule K-1, a capital account statement, a distribution notice, or an

investor report of any kind. Having never written to Claimant at all, the Debtors had no basis to believe the address remained current, and they undertook no diligence to find out. The staleness of the Debtors' records is a product of the Debtors' own inaction, not Claimant's.

6. The address is also facially deficient for international delivery. It bears no postal code; it is rendered entirely in English with no Chinese-language address; and it misspells the name of the residential complex ("Mension" for "Mansion").

7. Claimant did not receive the Bar Date Notice. He did not learn that a proof of claim process existed until November 14, 2025, when another affected investor posted a link to the claims agent's online submission portal. Claimant submitted his proof of claim that same day.

8. Claim No. 577 was therefore filed twelve days before this Court confirmed the Plan on November 26, 2025, and more than a month before the December 16, 2025 Effective Date. The Liquidating Trustee did not object to it until September 2, 2026 — approximately ten months later.

9. Claimant respectfully requests that the Objection be overruled as to Claim No. 577; or, in the alternative, that Claim No. 577 be deemed timely filed pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1).

II. FACTUAL BACKGROUND

10. The facts set forth in this Response are supported by the Declaration of Shuyuan Hu, submitted herewith pursuant to 28 U.S.C. § 1746 (the "Hu Declaration").

11. In 2019, Claimant invested $500,000 in HGE FIC E LLC in connection with an EB-5 immigrant investor petition bearing a January 2019 priority date. The transaction was arranged in its entirety by a Shanghai-based immigration intermediary, which prepared, completed, and submitted all of Claimant's subscription and immigration paperwork.

12. Apart from executing the subscription paperwork presented to him by the intermediary in 2019, Claimant has never negotiated with, corresponded with, or received any document directly from any Debtor. His sole point of contact at all times was the intermediary's representative. On March 29, 2025, after Claimant asked for it, that representative sent him two spreadsheets by

instant message. That transmission is the only information Claimant has ever received concerning his investment. It came from the intermediary rather than from any Debtor, and it predates the Petition Date by nearly three months.

13. Notwithstanding that the Debtors' own filings identify Claimant as a 3% Series B Member of HGE FIC E LLC, Claimant has never received a Schedule K-1 from HGE FIC E LLC in any tax year, nor any capital account statement, distribution notice, investor report, or other communication sent to him by any Debtor.

14. Claimant resided at Villa 53 Shanshui Qiancheng Mansion, Guiyang City, Guizhou Province, China until 2021, when he relocated permanently to Los Angeles County, California. He has resided in California continuously since that time, including throughout June, July, and August 2025.

15. Claimant never notified the Debtors of his relocation, because he had no contact information for the Debtors and no communication channel with them. His only channel was the intermediary.

16. In or around March 2025, Claimant first learned through social media posts by other investors that HGE schools were closing. He joined an online group of affected investors.

17. In late June 2025, the intermediary's representative told Claimant that HGE "was going to file for bankruptcy." She did not tell him that the Debtors had already filed on June 17 and 18, 2025, and she did not tell him that a claims process or bar date existed. She instead solicited Claimant and other investors to contribute funds toward a proposed lawsuit against HGE FIC E LLC.

18. On or about August 6, 2025 — one day before the General Bar Date — another investor posted a lengthy message in the investor group concerning a proposed lawsuit against a third party, which included, among many other subjects, a passing reference to an August 7 deadline. Claimant had not received the Debtors' Bar Date Notice, had never seen the notice or the customized proof of claim form referenced in Docket No. 160, and did not understand the nature of the proof of claim process. Claimant could not, within a single day and without the Debtors' notice or forms, have identified, understood, and completed the required cross-border filing.

Claimant discloses this fact candidly and does not contend that he was wholly unaware that HGE was in financial difficulty.

19. Between August and November 2025, Claimant repeatedly telephoned the intermediary's representative seeking information about the status of his $500,000 investment. She avoided his questions. At no time did she inform Claimant that he could file a proof of claim, that a bar date had existed, or that a claims agent had been appointed.

20. On November 14, 2025, another investor posted a link to the claims agent's online submission portal in the investor group. Claimant accessed the portal and submitted his proof of claim the same day. It was docketed as Claim No. 577.

21. On September 4, 2026, Claimant contacted counsel to the Liquidating Trustee within the twenty-day consensual resolution period described in the notice accompanying the Objection, and requested (i) the address to which the June 27, 2025 mailing was sent; (ii) whether that mailing was returned as undeliverable and whether any re-mailing occurred; and (iii) a copy of the customized proof of claim form generated for Claimant and the corresponding entry in the schedules of assets and liabilities for HGE FIC E LLC.

22. Approximately ninety minutes later the same day, counsel responded and provided the Guiyang address quoted above, and invited Claimant to identify any different address he had provided to the Debtors. Later that afternoon Claimant responded, explained that he had relocated in 2021 and had never had any direct contact with the Debtors, and renewed his requests regarding returned mail, the customized claim form, and whether the Debtors' records contained an email address or United States address for him. Counsel has not responded to those requests.

23. In his September 4, 2026 email, Claimant stated that his subscription agreement did not contain an address for him. On locating and reviewing his executed documents, Claimant determined that this was mistaken: both the subscription paperwork executed with HGE FIC E LLC and the escrow agreement with the intermediary state the Guiyang address. Claimant wrote to counsel on September 29, 2026 to correct the statement voluntarily, and corrects it again here. Claimant does not rely on the erroneous statement for any purpose in this Response.

III. ARGUMENT

A. The General Bar Date Cannot Be Enforced Against Claimant Because the Notice Was Not Reasonably Calculated to Reach Him.

23. Due process requires notice "reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." Mullane v. Cent. Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950).

24. A known creditor — one whose identity is known or reasonably ascertainable from the debtor's books and records — is entitled to actual notice of a bar date. Publication notice is constitutionally sufficient only as to unknown creditors. City of New York v. New York, New Haven & Hartford R.R. Co., 344 U.S. 293, 296–97 (1953); Tulsa Prof'l Collection Servs., Inc. v. Pope, 485 U.S. 478, 490 (1988). Claimant was indisputably a known party: the Debtors identified him by name in their own filings as a 3% Series B Member of HGE FIC E LLC.

25. Mailing is not the same as notice. The constitutional question is whether the means chosen were reasonably calculated to reach the party under the circumstances. Here they were not:

(a) The address was four years out of date. Claimant left it in 2021 and has lived in California ever since.

(b) The address was accurate when given in 2018 and 2019 but was never tested. An address that a debtor has used and that has produced delivered mail stands on different footing from one that has sat unused in a file for six years. The Debtors never used this address for any purpose before June 27, 2025.

(c) The Debtors never once used the address, or any other channel, to communicate with Claimant in six years — not even to furnish the Schedule K-1 that a limited liability company is required to provide annually to a member holding a 3% interest. The Debtors therefore had no basis to believe the address remained current, and undertook no diligence to find out.

(d) The address as recorded was facially deficient for delivery in China: no postal code, no Chinese-language rendering, and a misspelled complex name.

(e) The mailing was sent by First Class Mail on June 27, 2025 for an August 7, 2025 deadline — forty-one days — to an inland province of China. Federal Rule of Bankruptcy Procedure 2002(a)(7) prescribes a minimum of twenty-one days' mailed notice, a standard premised on domestic delivery. International surface and air letter mail to inland China routinely requires several weeks, leaving a non-English-speaking recipient effectively no time to act.

26. The presumption that a properly addressed, stamped, and mailed item was received does not assist the Liquidating Trustee here, because the predicate of that presumption — a properly addressed mailing — is absent. An address that is four years stale, incomplete for its destination country, and misspelled is not "properly addressed."

27. Claimant has requested, and the Liquidating Trustee has not provided, the returned-mail records that would establish whether the June 27, 2025 mailing was ever delivered. Those records are within the exclusive possession of the Liquidating Trustee and the claims agent. If the mailing was returned as undeliverable and no re-mailing or alternative service was attempted, the Debtors had actual knowledge that notice had failed and did nothing — which would independently defeat any claim of constitutionally adequate notice.

28. Because Claimant did not receive constitutionally adequate notice of the General Bar Date, that deadline cannot be enforced against him, and Claim No. 577 is not subject to disallowance under 11 U.S.C. § 502(b)(9).

B. Alternatively, If the Liquidating Trustee Contends That Claimant Holds an Equity Security Interest, No Proof of Interest Was Required.

29. The Debtors' own filings identify Claimant as "Hu Shuyuan — Series B — Member — 3%" of HGE FIC E LLC. Notably, the schedules of assets and liabilities for HGE FIC E LLC — as originally filed and as twice amended — do not list Claimant's $500,000 among the Debtor's liabilities.

30. To the extent the Liquidating Trustee contends that Claimant's interest is an equity security interest rather than a claim, then under Federal Rule of Bankruptcy Procedure 3003(b)(2) the list of equity security holders filed pursuant to Rule 1007(a)(3) constitutes prima facie evidence of

the validity and amount of that interest, and it is not necessary for the holder to file a proof of interest. On that premise the General Bar Date is simply inapplicable to Claimant, and the Objection fails for that reason as well.

31. Claimant does not concede the characterization of his interest and expressly reserves all rights with respect to it. He notes only that the Liquidating Trustee cannot have it both ways: either Claimant was a known creditor entitled to actual notice of the bar date, or he was a listed equity holder who was not required to file at all.

C. In the Further Alternative, the Failure to File by the General Bar Date Was the Result of Excusable Neglect.

32. Federal Rule of Bankruptcy Procedure 9006(b)(1) permits this Court to accept a late filing where the failure to act was the result of excusable neglect, and Rule 3003(c)(3) permits the Court to extend a bar date for cause shown. The governing standard is the equitable, all-circumstances test of Pioneer Investment Services Co. v. Brunswick Associates Ltd. Partnership, 507 U.S. 380, 395 (1993), which weighs the danger of prejudice, the length of the delay and its potential impact on the proceedings, the reason for the delay, and whether the movant acted in good faith. Each factor favors Claimant.

33. Prejudice. There is none. Claim No. 577 was filed on November 14, 2025 — twelve days before confirmation and thirty-two days before the Effective Date. It has appeared on the Claims Register since that date and was available to the Debtors, the Committee, and the Liquidating Trustee throughout plan confirmation, consummation, and claims reconciliation. The Liquidating Trustee waited approximately ten months to object, which is itself inconsistent with any assertion of prejudice.

34. Length of delay and impact on the proceedings. Claim No. 577 was filed ninety-nine days after the General Bar Date. Schedule 1 to the proposed Order reflects claims filed as late as May 5, 2026 — approximately nine months after the General Bar Date — which the Liquidating Trustee has addressed in the same omnibus objection without suggesting any disruption to the administration of these cases. No distribution has been made. Nothing about Claimant's claim has delayed or complicated these proceedings.

35. Reason for the delay. The delay was not within Claimant's reasonable control. He received no notice from the Debtors, held no contact information for them, and had no communication channel other than the intermediary that arranged his investment — which did not inform him of the bankruptcy filing, the claims process, or the bar date, and which instead solicited money from him for a proposed lawsuit against a Debtor that was already in chapter 11 and protected by the automatic stay. Claimant learned that a claims process existed only on November 14, 2025, and filed the same day.

36. Good faith. Claimant filed his proof of claim on the very day he learned it was possible to do so. He twice contacted counsel to the Liquidating Trustee within and after the consensual resolution period established by the notice accompanying the Objection, sought to resolve the matter without motion practice, and has disclosed candidly in this Response what he knew and when he knew it. There is no suggestion of gamesmanship or strategic delay.

IV. RESERVATION OF RIGHTS

37. This Response is directed solely to the ground asserted in the Objection — timeliness. Claimant expressly reserves all rights with respect to the validity, amount, priority, classification, and characterization of Claim No. 577, and with respect to any claims he may hold against any person or entity other than the Debtors, including without limitation the intermediary that arranged his investment and its affiliates. Nothing herein shall be construed as a waiver of any such right, or as a concession as to any matter not expressly addressed.

V. PRAYER

WHEREFORE, Claimant Shuyuan Hu respectfully requests that this Court enter an order:

(a) overruling the Objection as it relates to Claim No. 577 and excluding Claim No. 577 from Schedule 1 to any order sustaining the Objection;

(b) in the alternative, deeming Claim No. 577 timely filed pursuant to Federal Rules of Bankruptcy Procedure 9006(b)(1) and 3003(c)(3);

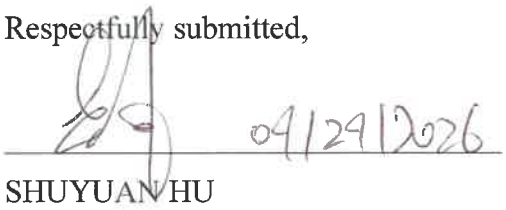
(c) in the further alternative, treating the Objection as it relates to Claim No. 577 as a separate contested matter under Federal Rule of Bankruptcy Procedure 9014, as

contemplated by paragraph 20 of the Objection, and setting the matter for further hearing; and

(d) granting such other and further relief as is just.

Dated: September 29, 2026

Respectfully submitted,



SHUYUAN HU
8 S Old Ranch Rd
Arcadia, California 91007
(929) 855-6633
scotthu.work@gmail.com
Creditor, appearing pro se

DECLARATION OF SHUYUAN HU

PURSUANT TO 28 U.S.C. § 1746

I, Shuyuan Hu, declare under penalty of perjury as follows:

1. I am over the age of eighteen and competent to make this declaration. The facts stated herein are within my personal knowledge and are true and correct.

2. I am the claimant identified on Schedule 1 to the proposed order attached to the Liquidating Trustee's Second Omnibus Objection [Docket No. 932] as "Shuyuan Hu," holder of Claim No. 577 against HGE FIC E LLC in the amount of $500,000.00.

3. In 2019, I invested $500,000 in HGE FIC E LLC in connection with an EB-5 immigrant investor petition. The investment was arranged entirely through a Shanghai-based immigration intermediary, which prepared, completed, and submitted all of my subscription and immigration paperwork.

4. In 2019 I executed subscription paperwork with HGE FIC E LLC. That paperwork was prepared and presented to me by the intermediary's representative. Apart from signing those documents, I have never spoken with, written to, met with, or received any communication from HGE FIC E LLC or any other Debtor at any time. I did not hold and do not hold any contact information for any Debtor. My only channel of information concerning my investment was the intermediary's representative.

5. I have never received a Schedule K-1 from HGE FIC E LLC in any tax year, nor any capital account statement, distribution notice, investor report, or other document sent to me by HGE FIC E LLC or any affiliate.

6. There is one exception, which I state here for completeness. On March 29, 2025, I asked the intermediary's representative for HGE's financial records, and she sent me two spreadsheets by instant message. When I asked her for the financial statements for the years 2019 through 2024, she told me that HGE had never provided them and that HGE had refused to provide them. I asked her why HGE would not provide them, and she gave no explanation. The two spreadsheets

I did receive are exports generated by the Debtors' internal financial reporting system and cover only fiscal years 2022 and 2023. That is the only financial information I have ever received concerning my investment. It came from the intermediary, not from any Debtor. It was sent nearly three months before the Petition Date and made no reference to any bankruptcy proceeding, claims process, or filing deadline.

7. My subscription paperwork with HGE FIC E LLC does state the Guiyang address — Villa 53 Shanshui Qiancheng Mansion, Guiyang City, Guizhou Province, China — as my address, and so does the escrow agreement with the intermediary. That address was accurate when those documents were signed in 2018 and 2019. I left it on April 21, 2021 and have never returned to it.

8. I resided at Villa 53 Shanshui Qiancheng Mansion, Guiyang City, Guizhou Province, China until 2021. On April 21, 2021 I relocated to Arcadia, California, where I have resided continuously since that date, including throughout June, July, and August 2025. My address is 8 S Old Ranch Rd, Arcadia, California 91007.

9. I never notified any Debtor of my change of address, because I had no contact information for any Debtor and no direct channel of communication with them. I did inform the intermediary's representative that I had moved to the United States to study. She was aware from that time forward that I no longer resided at the Guiyang address.

10. I did not receive the Notice of Deadline to File Proof of Claim, the customized Modified Official Form 410 Proof of Claim, or any other document described in Docket No. 160. I have no record of receiving any mailing from Kurtzman Carson Consultants LLC or Verita Global at any address, at any time.

11. In or around March 2025, I first learned through social media posts by other investors that HGE schools were closing. I joined an online group of affected investors.

12. In late June 2025, the intermediary's representative told me that HGE "was going to file for bankruptcy." She did not tell me that the Debtors had already filed, and she did not tell me that any claims process or filing deadline existed. She asked me and other investors to contribute funds toward a proposed lawsuit against HGE FIC E LLC.

13. On or about August 6, 2025, another investor posted a long message in the investor group about a proposed lawsuit against a different company. That message included, among many other subjects, a passing reference to a deadline of August 7. I state this candidly. I had not received the Debtors' notice or claim form, I did not understand what a proof of claim was, and with one day remaining I did not know how to identify, obtain, complete, or submit the required filing.

14. Between August and November 2025, I telephoned the intermediary's representative on multiple occasions to ask about the status of my $500,000. She avoided my questions. She never told me that I could file a proof of claim, that a bar date had passed, or that a claims agent had been appointed.

15. On November 14, 2025, another investor posted a link to the claims agent's online submission portal. I accessed the portal and submitted my proof of claim the same day. That submission was docketed as Claim No. 577.

16. I have not received any distribution on account of my investment, and I have not recovered any part of the $500,000.

17. On September 4, 2026 at 11:00 a.m., I sent an email to Amber M. Carson of Gray Reed, counsel to the Liquidating Trustee, within the twenty-day period described in the notice accompanying the Objection. I asked for the address to which the June 27, 2025 mailing was sent, whether it was returned as undeliverable, and for a copy of the customized claim form generated for me together with the corresponding entry in the schedules for HGE FIC E LLC.

18. At 12:41 p.m. that same day, Ms. Carson replied and stated that the address used was "Hu Shuyuan, Villa 53 Shanshui Qiancheng Mension, GUIZHOU PROVINCE, Guiyang City, China," and invited me to provide any different address I had given to the Debtors. At 1:52 p.m. that same day, I replied, explained that I had left that address in 2021 and had never had direct contact with the Debtors, and renewed my other requests. I have received no further response. True and correct copies of this correspondence are attached as Exhibit 1.

19. In my September 4, 2026 email to Ms. Carson I stated that my subscription agreement did not contain an address for me. That statement was mistaken. After locating and reviewing my executed documents, I determined that the subscription paperwork I executed with HGE FIC E

LLC in 2019, and the escrow agreement with the intermediary, both state the Guiyang address. I wrote to Ms. Carson on September 29, 2026 to correct this voluntarily, and I correct it here. A copy of that correction is included in Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 29, 2026, at Arcadia, California.

9/29/2026

SHUYUAN HU

Gmail **Scott Hu <scotthu.work@gmail.com>**

Claim No. 577 (Shuyuan Hu / Hu Shuyuan) – HGE FIC E LLC – Request re: Second Omnibus Objection [Docket No. 932]

3 messages

Scott Hu <scotthu.work@gmail.com> Fri, Sep 4, 2026 at 11:00 AM
To: acarson@grayreed.com
Bcc: Scott Hu <scotthu.work@gmail.com>

Dear Ms. Carson,

I am writing in response to the Liquidating Trustee's Second Omnibus Objection to Certain Proofs of Claim (Late-Filed Claims) [Docket No. 932], within the twenty-day period identified in the accompanying notice for discussing a consensual resolution.

I am the claimant identified on Schedule 1 to the proposed order as "Shuyuan Hu," Claim No. 577, filed against HGE FIC E LLC in the amount of $500,000.00.

Paragraph 18 of the Objection states that the claimants listed on Schedule 1 received proper notice of the General Bar Date. I have reviewed the certificates of service cited. Docket No. 160, Exhibit E, at page 111 of 265, lists "Hu Shuyuan" as served by First Class Mail on June 27, 2025, but the address is redacted as "Address on File" pursuant to Docket No. 57. I have no record of receiving that mailing.

Before determining whether a response to the Objection is necessary, I would be grateful if you could provide, or arrange for Verita to provide, the following:

1. The complete mailing address to which the Notice of Deadline to File Proof of Claim was sent to "Hu Shuyuan" on June 27, 2025, as reflected in Exhibit E to Docket No. 160, and the source of that address in the Debtors' books and records.

2. Whether that mailing, or any other bar date notice addressed to me, was returned as undeliverable; and if so, the date of return and whether any re-mailing occurred.

3. A copy of the customized Modified Official Form 410 Proof of Claim generated for "Hu Shuyuan" in connection with that mailing, together with the corresponding entry from the schedules of assets and liabilities for HGE FIC E LLC, showing the scheduled amount and whether the claim was scheduled as contingent, unliquidated, or disputed.

By way of context, I invested $500,000 in HGE FIC E LLC through a Shanghai-based immigration intermediary, which handled all of my subscription paperwork. The contact information in the Debtors' records may therefore reflect an address associated with that intermediary or a former address of mine rather than my current residence.

I would like to resolve this without motion practice if possible, and I am available by telephone or video conference at your convenience. This request is made with full reservation of my rights.

Thank you for your assistance.

Sincerely,
Shuyuan Hu
[redacted]@gmail.com
(929) 855-6633

Amber M. Carson <acarson@grayreed.com> Fri, Sep 4, 2026 at 12:41 PM
To: Scott Hu <scotthu.work@gmail.com>

Good afternoon,

The addresses are redacted on Certificates of Service for the individuals' (here, your) protection. The redacted address in Docket No. 160 you referred to below is Hu Shuyuan, Villa 53 Shanshui Qiancheng Mension, GUIZHOU PROVINCE, Guiyang City, China. If you provided notice to the Debtors of a different address to which notices should have been sent, please let me know and forward it to me.

Thank you,

Amber

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

GRAY REED

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[Quoted text hidden]

Scott Hu <scotthu.work@gmail.com> Fri, Sep 4, 2026 at 1:52 PM
To: "Amber M. Carson" <acarson@grayreed.com>

Dear Amber,

Thank you for the prompt reply and for providing the address.

To answer your question directly: I did formerly reside at Villa 53 Shanshui Qiancheng Mansion, Guiyang City, Guizhou Province, China. However, I relocated to Los Angeles, California in 2021, four years before the June 27, 2025 mailing. Throughout June, July and August 2025 I was residing at 8 S Old Ranch Rd, Arcadia, CA 91007 — the same address that appears on my Proof of Claim and on Schedule 1 to the Objection.

As to whether I provided the Debtors with a different address: I never had any direct contact with the Debtors at any point, before or after my investment. My subscription in HGE FIC E LLC was arranged in 2019 entirely through a Shanghai-based immigration intermediary, which prepared and submitted all of my paperwork. My subscription agreement does not contain an address for me at all, which suggests the Guiyang address in the Debtors' records was supplied by that intermediary rather than by me, most likely from tax or KYC forms completed in 2018 or 2019.

I would also note the following, which may bear on the questions below:

• I have never received a Schedule K-1 from HGE FIC E LLC, in any year, notwithstanding that I am identified in the Debtors' own filings as a Series B Member holding a 3% interest. To my knowledge the Debtors never sent me any communication of any kind, at any address, at any time.

• The address as recorded appears incomplete for international delivery: it contains no postal code, is rendered only in English with no Chinese-language address, and the building name is misspelled ("Mension" for "Mansion").

In light of the above, I would be grateful if you could provide the following, two of which remain outstanding from my earlier message:

1. Whether the June 27, 2025 mailing to the Guiyang address was returned as undeliverable, and if so, the date of return and whether any re-mailing or alternative service was attempted. I understand Verita maintains returned-mail records in the ordinary course.

2. A copy of the customized Modified Official Form 410 generated for "Hu Shuyuan," together with the corresponding entry in the schedules of assets and liabilities for HGE FIC E LLC, showing the scheduled amount and whether the claim was scheduled as contingent, unliquidated, or disputed.

3. Whether the Debtors' records contain an email address or United States address for me, and whether any notice was served on me electronically. I note that Verita served certain parties by electronic mail in these cases (see Exhibit C to Docket No. 290).

I would like to resolve this consensually if at all possible, and I appreciate your cooperation to date. All of my rights are expressly reserved.

Sincerely,
Shuyuan Hu
Claim No. 577 — HGE FIC E LLC
8 S Old Ranch Rd, Arcadia, CA 91007
[redacted]@gmail.com
(929) 855-6633
[Quoted text hidden]

CERTIFICATE OF SERVICE

I certify that on September 29, 2026, a true and correct copy of the foregoing Response, the Declaration of Shuyuan Hu, and all exhibits thereto were served by United States mail, first class postage prepaid, and by electronic mail where indicated, upon the following:

Clerk of the Court

U.S. Bankruptcy Court, Northern District of Texas

Earle Cabell Federal Building

1100 Commerce St., Room 1254

Dallas, TX 75242-1496

Counsel to the Liquidating Trustee:

Jason S. Brookner

Amber M. Carson

GRAY REED

1845 Woodall Rodgers Fwy, Suite 1300

Dallas, Texas 75201

jbrookner@grayreed.com; acarson@grayreed.com

Office of the United States Trustee:

Office of the United States Trustee for the Northern District of Texas

1100 Commerce Street, Room 976

Dallas, Texas 75242

09/29/2026

SHUYUAN HU