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UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

In re DIABLO GRANDE COMMUNITY FACILITIES DISTRICT NO. 1, Debtor.	Case No. 25-26635-A-9 DCN BWS-004 **DECLARATION OF JOSEPH P. BUCHMAN IN SUPPORT OF DEBTOR'S MOTION FOR ENTRY OF ORDER:** **(1) FIXING DECEMBER 4, 2026, AS THE BAR DATE FOR ALL CLAIMS;** **(2) APPROVING FORM OF NOTICE OF BAR DATE;** **(3) REQUIRING DEBTOR TO PROVIDE NOTICE OF BAR DATE TO CREDITORS AND PARTIES IN INTEREST BY NO LATER THAN NOVEMBER 6, 2026** Date: October 13, 2026 Time: 9:30 a.m. Ctrm: Dept. A, Ctrm 11 2500 Tulare Street, Fresno California

DECLARATION OF JOSEPH P. BUCHMAN

I, Joseph P. Buchman, declare as follows:

1. I am over the age of 18 and am not a party to this action. I am an attorney with the law firm of Burke, Williams & Sorensen, LLP, attorneys for Diablo Grande Community Facilities District No. 1 (the "**Debtor**"). I submit this Declaration in support of the Debtor's motion for

entry of an order (1) fixing December 4, 2026, as the date by which proofs of claim against the Debtor must be filed in order to be considered timely ("**Bar Date**"); (2) approving the form of Notice, a copy of which is attached to the Motion as Exhibit 2; and (3) requiring the Debtor to complete service of the Notice, which combines the Notice of Order For Relief , and the Notice of Bar Date (the "**Notice**"), in the manner required by 11 U.S.C. § 923, by no later than November 6, 2026 (the "**Motion**"). I am admitted to practice law before all courts of the State of California. I have personal knowledge of the matters stated herein except as to those matters stated on information and belief and if called as a witness and sworn, I could competently testify thereto.

2. The Bankruptcy Case was commenced by the filing of the Debtor's Bankruptcy Petition on November 25, 2025 (the "**Petition**") [Dkt. 1], after the Debtor's governing authority, the Board of the Western Hills Water District (the "**Board**"), declared a fiscal emergency of the Debtor [Dkt. 4].

3. The Debtor is a community facilities district established by the Board of Directors of the Western Hills Water District on September 24, 2000, pursuant to the Mello-Roos Act (Cal. Gov't. Code §§ 53311-53368.3) (Resolution No. 2000-06). As such, the CFD is a municipality as defined in section 101(40) of the Bankruptcy Code.

4. The hearing on the Motion is set for October 13, 2026, at 9:30 a.m. It is anticipated that by the time of that hearing, the Court will have entered the Order For Relief in this Chapter 9 case. Bankruptcy Code section 923 requires that a notice of an order for relief under Chapter 9 be given, and that this notice also be published at least once a week for three successive weeks in at least one newspaper of general circulation published with the district in which the case is commenced, and in such other newspaper having a general circulation among bond dealers and bondholders as the court designates.

5. The Motion requests that the Court permit the Debtor to combine the notice of the claims bar date with the notice of order for relief. A copy of the proposed order is attached to the Motion as Exhibit 1. A copy of the proposed combined Notice is attached to the Motion as Exhibit 2. The method of service and publication would be the same as the Debtor used to serve and publish the Notice of Commencement of Chapter 9 Case (see, Dkt. 28, 29, 30, 31, 32, and 33).

This method of service meets the requirements of Bankruptcy Rule 2002(a)(7) as a copy will be mailed to all known creditors, including bondholders, and will be published as well. Publication of notice is not a requirement under Bankruptcy Rule 2002(a)(7).

6. The Debtor believes the only claims against the bankruptcy estate are those of the County of Stanislaus, California, the Diablo Grande Residential Association ("HOA") and the holders of the Special Tax Bonds ("Bonds") identified as follows: Western Hills Water District Diablo Grande Community Facilities District No. 1 Special Tax Refunding Bonds Series 2014 (CA)(Base CUSIP® Nos. 958324DG7, 958324DH5, 958324DJ1, 958324DM4, 958324DR3, and 958324DX0) and Western Hills Water District Diablo Grande Community Facilities District No. 1 Special Tax Refunding Bonds Series 2015 (CA)(Base CUSIP® Nos. 958324DY8, 958324DZ5, 958324EC5, 958324ED3, and 958324EE1) ("Bonds") issued by the Western Hills Water District.

7. The Debtor will mail (or cause to be mailed) the Notice to the creditors listed in the Debtor's schedules and to the registered holders of the Bonds in coordination with the Debtor's Noticing and Claims Agent KCC, LLC dba Verita Global. I am informed and believe that the Bonds are held in "book entry" or electronic form at The Depository Trust Company ("DTC"), New York, New York. DTC holds the Bonds for its participants, often broker-dealers ("DTC Participants"), which in turn hold the Bonds for the actual beneficial owners of the Bonds. Although the identity of the DTC Participants can be determined on a date certain if the Issuer, i.e., the Debtor, or the Notice and Claims Agent, requests the necessary report from DTC, the identities of the actual beneficial owners for the Bonds held by the DTC Participants remain unknown. Federal security rules require, however, that notices delivered to the DTC Participants be delivered by those broker-dealers to their customers, the beneficial owners of the Bonds. This delivery is handled by a distribution agent such as Broadridge Financial Solutions, Inc.

8. In addition, the Debtor will cause the Notice to be published in The Modesto Bee and The Bond Buyer. The Modesto Bee is a newspaper of general circulation and is published within the County of Stanislaus, California. The Debtor further submits The Bond Buyer is a publication of general circulation among municipal bond dealers and bondholders and meets the requirements of 11 U.S.C. § 923. The combined Notice will be published for three (3)

consecutive weeks and such publication shall be completed by no later than November 6, 2026, more than 21 days before the Bar Date. The publication version of the combined Notice will be the same as the mailed version.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23rd day of September, 2026, at Los Angeles, California.

/s/ Joseph P. Buchman
Joseph P. Buchman