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SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
ORI KATZ, State Bar No. 209561
KIRK RIDER, State Bar No. 364539
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: (415) 434-9100
Facsimile: (415) 434-3947
Email: okatz@sheppard.com
krider@sheppard.com

Proposed Counsel for Highlands Community Charter and Technical Schools

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

In re Highlands Community Charter and Technical Schools, Debtor and Debtor in Possession.[1]	Case No. 26-25868 Chapter 11 **DCN: SMR-1** Hon. [●] [*Relief requested on an ex parte basis*]

EXHIBITS IN SUPPORT OF DEBTOR'S *EX PARTE* APPLICATION FOR ENTRY OF AN ORDER (I) MODIFYING LBR 9014-1(d) TO ALLOW THE FILING AND SERVICE OF AN OMNIBUS NOTICE OF FIRST DAY MOTIONS, (II) SHORTENING NOTICE WITH RESPECT TO THE FIRST DAY MOTIONS, (III) MODIFYING LBR 9014-1(d)(5) TO ALLOW REQUESTS FOR RELIEF TO BE JOINED IN A SINGLE MOTION, AND (IV) MODIFYING LBR 9014-1(d)(4) SOLELY FOR PROCEDURAL FIRST DAY MOTIONS

[1] The last four digits of the Debtor's federal tax identification number is 0967. The mailing address for the Debtor is 1111 Howe Ave., Suite 505, Sacramento, CA 95825.

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Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a non-profit public benefit corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), hereby submits the following exhibit in support of the *Debtor's Ex Parte Application for Entry of an Order (I) Modifying LBR 9014-1(d) to Allow the Filing and Service of an Omnibus Notice of First Day Motions, (II) Shortening Notice with Respect to the First Day Motions, (III) Modifying LBR 9014-1(d)(5) to Allow Requests for Relief to Be Joined in a Single Motion, and (IV) Modifying LBR 9014-1(d)(4) Solely for Procedural First Day Motions* (the "Application"), filed concurrently herewith:

Exhibit	Description	Pages
A	[Proposed] Order (I) Modifying LBR 9014-1(d) to Allow the Filing and Service of an Omnibus Notice of First Day Motions, (II) Shortening Notice with Respect to the First Day Motions; (III) Modifying LBR 9014-1(d)(5) to Allow Requests for Relief to Be Joined in a Single Motion, and (IV) Modifying LBR 9014-1(d)(4) Solely for Procedural First Day Motions	3–6

Dated: October 4, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By */s/ Ori Katz*
ORI KATZ
Proposed Counsel for Highlands Community Charter and Technical Schools

EXHIBIT A

Proposed Order

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
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San Francisco, California 94111-4109
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UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

In re Highlands Community Charter and Technical Schools, Debtor and Debtor in Possession.[2]	Case No. 26-25868 Chapter 11 **DCN: SMR-1** Hon. [●] [*Relief requested on an ex parte basis*]

[PROPOSED] ORDER (I) MODIFYING LBR 9014-1(d) TO ALLOW THE FILING AND SERVICE OF AN OMNIBUS NOTICE OF FIRST DAY MOTIONS, (II) SHORTENING NOTICE WITH RESPECT TO THE FIRST DAY MOTIONS, (III) MODIFYING LBR 9014-1(d)(5) TO ALLOW REQUESTS FOR RELIEF TO BE JOINED IN A SINGLE MOTION, AND (IV) MODIFYING LBR 9014-1(d)(4) SOLELY FOR PROCEDURAL FIRST DAY MOTIONS

[2] The last four digits of the Debtor's federal tax identification number is 0967. The mailing address for the Debtor is 1111 Howe Ave., Suite 505, Sacramento, CA 95825.

This Court, having considered the *Debtor's Ex Parte Application for Entry of an Order (I) Modifying LBR 9014-1(d) to Allow the Filing and Service of an Omnibus Notice of First Day Motions, (II) Shortening Notice with Respect to the First Day Motions, (III) Modifying LBR 9014-1(d)(5) to Allow Requests for Relief to Be Joined in a Single Motion, and (IV) Modifying LBR 9014-1(d)(4) Solely for Procedural First Day Motions* (the "Application")[3] of Highlands Community Charter and Technical Schools, the above-captioned debtor and debtor in possession (the "Debtor"), filed on the Petition Date; and upon the First Day Declaration; and upon the Raymond Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and General Orders 182 and 223 of the United States District Court for the Eastern District of California; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtor's notice of the Application is reasonable and sufficient under the circumstances, and no other or further notice need be provided; and this Court having found that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein and that such relief is necessary to avoid immediate and irreparable harm pursuant to Bankruptcy Rule 6003; and the Court having found cause for consideration of the Application on an *ex parte* basis; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is granted in its entirety.

2. The Debtor shall file and serve a single, omnibus notice of the Hearing on the First Day Motions (the "Omnibus Notice") on the Notice Parties in the manner set forth in the Application. The Hearing on the First Day Motions shall take place on the date and time set forth

[3] Capitalized terms used but not defined herein have the meanings assigned to them in the Application.

in the Omnibus Notice. Proof of service of such Omnibus Notice on the Notice Parties shall be sufficient to provide notice of the Hearing on the First Day Motions; *provided*, *however*, that the Court may require other or further notice of any final hearing on a First Day Motion. LBR 9014-1(d) is hereby modified to the extent necessary to permit the foregoing Omnibus Notice procedure for the First Day Motions.

3. The periods required for notice of the Hearing on the First Day Motions are hereby modified and shortened; *provided*, *however*, that service of all documents for the First Day Motions on the Notice Parties, by either email, facsimile, first class mail, or overnight delivery, not later than twenty-four (24) hours prior to the date and time set for the Hearing, shall be deemed sufficient notice to have the matter heard at the Hearing.

4. Any opposition to the relief requested in a First Day Motion may be presented at the hearing on the respective First Day Motion.

5. Parties may appear at the hearings on the First Day Motions by videoconference using the following procedures:

https://www.caeb.uscourts.gov/documents/Forms/Misc/ZoomGov%20Protocols.pdf.

6. To the extent necessary and typical, LBR 9014-1(d)(5) is modified to permit the Debtor to join multiple requests for relief in the First Day Motions.

7. To the extent necessary, LBR 9014-1(d)(4) is modified to expand the page limitation from six to ten pages solely for the Procedural First Day Motions.

8. The Court will retain jurisdiction to implement and enforce the terms of this Order.

DATED:

_____

United States Bankruptcy Judge