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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.[1]	Case No. 26-25868 Chapter 11 DCN: SMR-2 Judge: Hon. [●] Date: [●], 2026 Time: [●] Place: [●]

DECLARATION OF JONATHAN RAYMOND IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ENTRY OF AN ORDER EXTENDING TIME TO FILE SCHEDULES OF ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS

I, Jonathan Raymond, hereby state and declare as follows:

[1] The Debtor in this chapter 11 case, along with the last four digits of the Debtor's federal tax identification number, is: Highlands Community Charter and Technical Schools [0967]. The mailing address for the Debtor is 1111 Howe Ave. Suite 505 Sacramento, CA 95825.

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1. I am the Executive President of Highlands Community Charter and Technical Schools ("HCCTS" or, the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California. I make this Declaration in support of the *Debtor's Emergency Motion for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* (the "Motion") filed concurrently herewith and for all other purposes authorized by law.

2. The Motion seeks entry of an order, substantially in the form attached to the Exhibit List as Exhibit A filed concurrently herewith, granting the Debtor a thirty (30) day extension of time to file the schedules, statements, and other documents (collectively, the "Schedules") required by Rule 1007(b)(1) the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), pursuant to §§ 105 and 521 and Bankruptcy Rule 1007, without prejudice to the Debtor's right to request further extensions.[2]

3. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with others in the Debtor's management team and the Debtor's advisors, my review of relevant documents and information concerning the Debtor's operations, financial affairs, and restructuring initiatives, or my opinions based upon my experience and knowledge. The documents referenced herein, or otherwise relied upon for purposes of this Declaration, are business records of the Debtor, prepared and kept in the ordinary course of the regularly conducted business activities of the Debtor and used by me for those purposes. I am over the age of eighteen and authorized to submit this Declaration on behalf of the Debtor. If called upon as a witness, I could and would testify competently to the facts set forth in this Declaration.

4. The Debtor filed this bankruptcy case (the "Chapter 11 Case") on date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtor is operating its business and managing its properties as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or

[2] Unless otherwise defined herein, all capitalized terms have the definitions set forth in the Motion filed concurrently herewith.

examiner has been made in this Chapter 11 Case, and no committees have been appointed or designated.

5. The Debtor is a 501(c)(3) non-profit corporation that owns, manages and operates two adult-serving charter schools in Sacramento County: Highlands Community Charter School ("HCCS") and California Innovative Career Academy ("CICA" and, together with HCCS, the "Schools"). The Twin Rivers Unified School District ("Twin Rivers") issued the current charters (the "Charters") for both HCCS and CICA, and since opening in August 2014, HCCTS has served approximately 60,000 students. The Debtor is exempt from certain federal income taxation as an organization described in Section 501(c)(3) of the Internal Revenue Code of 1986. A more detailed description of the Debtor, including its current and historical business operations and the events precipitating the Chapter 11 Case, are set forth in the *Declaration of Jonathan Raymond in Support of Chapter 11 Petition and First Day Motions* (the "First Day Declaration"), which is incorporated herein by reference.

6. As of the Petition Date, the Debtor estimates that it has over $88 million in liabilities and approximately 2,000 potential creditors and parties in interest (on a consolidated basis). Accordingly, the Debtor requires more time to fully analyze its assets and liabilities with the assistance and advice of counsel and other advisors in order to prepare full and accurate Schedules. During this same period, the Debtor must also begin discussions with creditors, vendors and other parties in interest regarding this Chapter 11 Case and its plans and operations going forward, which will require significant time and attention. All the while, the Debtor must still tend to its business affairs and operate the Schools.

7. If the Debtor is forced to file the Schedules by the current deadline, then the Debtor and its professionals will most likely have to later expend substantial time and resources to prepare amendments at the expense of the estate and creditors. Therefore, the Debtor respectfully submits that an extension of time for the Debtor to prepare the Schedules is warranted and appropriate. Furthermore, the Debtor respectfully submits that none of its creditors or other parties in interest will be prejudiced by the extension of time requested herein.

8. I believe an immediate and orderly transition into chapter 11 is critical to the viability of the Debtor's operations and that any delay in granting the requested relief in the Motion could hinder operations and disrupt the efficient restructuring process. I believe that emergency relief is necessary to avoid immediate and irreparable harm to the Debtor in the early stages of the Chapter 11 Case. Moreover, I believe that immediate implementation of the relief sought in the Motion is necessary to limit the potential harm to the Debtor's operations and assets.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated this 4th day of October 2026, in Sacramento, California .

Signed by:
Jonathan Raymond
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Jonathan Raymond