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[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-XX Judge: Hon. [●] Date: [●], 2026 Time: [●] Place: [●]

DECLARATION OF EVAN GERSHBEIN IN SUPPORT OF DEBTOR'S EMERGENCY APPLICATION FOR ORDER AUTHORIZING AND APPROVING THE APPOINTMENT OF KURTZMAN CARSON CONSULTANTS, LLC DBA VERITA GLOBAL, AS NOTICE, CLAIMS, AND SOLICITATION AGENT

I, Evan Gershbein being duly sworn, state the following under penalty of perjury:

1. I am an Executive Vice President with Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") a Chapter 11 administrative services firm whose offices are located at 222

[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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N. Pacific Coast Highway, 3rd Floor, El Segundo, CA 90245. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. I submit this Declaration in support of the above-captioned debtor's (the "Debtor") *Emergency Application For Order Authorizing and Approving the Appointment of Kurtzman Carson Consultants LLC, dba Verita Global as Notice, Claims, and Solicitation Agent* (the "Application"). Except as otherwise noted, I have personal knowledge of the matters set forth herein.

3. Verita is comprised of leading industry professionals with significant experience in both the legal and administrative aspects of large, complex Chapter 11 cases. Verita's professionals have experience in noticing, claims administration, solicitation, balloting and facilitating other administrative aspects of chapter 11 cases and experience in matters of this size and complexity. Verita's professionals have acted as debtor's counsel or official claims and noticing agent in many large bankruptcy cases in this District and in other districts nationwide.

4. As agent and custodian of Court records pursuant to 28 U.S.C. § 156(c), Verita will perform, at the request of the Clerk of the United States Bankruptcy Court for the Eastern District of California (the "Clerk"), the services specified in the Application and the that certain *Verita Agreement For Services*, dated as of September 25, 2026, by and between Verita and the Debtor (such agreement, together with all attachments and amendments thereto, the "Services Agreement"). In addition, at the Debtor's request, Verita will also perform any related administrative, technical, and support services as specified in the Application and the Services Agreement. In performing such services, Verita will charge the Debtor the rates set forth in the Services Agreement, which is attached as **Exhibit B** to the Exhibit List filed contemporaneously herewith.

5. Verita represents, among other things, the following:

a. Verita is not a creditor of the Debtor;

b. Verita will not consider itself employed by the United States government and shall not seek any compensation from the United States government in its capacity as the Claims, Noticing, and Solicitation Agent in this Chapter 11 Case;

c. By accepting employment in this Chapter 11 Case, Verita waives any rights to receive compensation from the United States government in connection with this Chapter 11 Case;

d. In its capacity as the Claims, Noticing, and Solicitation Agent in this Chapter 11 Case, Verita will not be an agent of the United States and will not act on behalf of the United States;

e. Verita will not employ any past or present employees of the Debtor in connection with its work as the Claims, Noticing, and Solicitation Agent in this Chapter 11 case;

f. Verita is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code with respect to the matters upon which it is engaged;

g. In its capacity as Claims, Noticing, and Solicitation Agent in this Chapter 11 case, Verita will not intentionally misrepresent any fact to any person;

h. Verita shall be under the supervision and control of the Clerk's office with respect to the receipt and recordation of claims and claim transfers;

i. Verita will comply with all requests of the Clerk's office and the guidelines promulgated by the Judicial Conference of the United States for the implementation of 28 U.S.C. § 156(c); and

j. None of the services provided by Verita as Claims, Noticing, and Solicitation Agent in this Chapter 11 Case shall be at the expense of the Clerk's office.

6. Although the Debtor does not propose to retain Verita under section 327 of the Bankruptcy Code at this time pursuant to the Application, I caused to be submitted for review by our conflicts system the names of all known potential parties in interest (the "Potential Parties in Interest") in this Chapter 11 Case. The list of Potential Parties in Interest was provided by the Debtor and included, among other parties, the Debtor, non-debtor affiliates, current and former directors and officers of the Debtor, significant stakeholders, the Debtor's 20 largest unsecured creditors, and other parties. The results of the conflict check were compiled and reviewed by Verita professionals under my supervision. At this time and as set forth in further detail herein, Verita is not aware of any relationship that would present a disqualifying conflict of interest. Should Verita discover any new relevant facts or relationships bearing on the matters described herein during the period of its retention, Verita will use reasonable efforts to file promptly a supplemental declaration.

7. To the best of my knowledge, and based solely upon information provided to me by the Debtor, and except as provided herein, neither Verita, nor any of its professionals, has any materially adverse connection to the Debtor, its creditors, or other relevant parties. Verita may have

relationships with certain of the Debtor's creditors as vendors or in connection with cases in which Verita serves or has served in a neutral capacity as Claims and Noticing Agent and/or administrative advisor for another Chapter 11 debtor.

8. Verita has and will continue to represent clients in matters unrelated to this Chapter 11 case. In addition, Verita and its personnel have and will continue to have relationships in the ordinary course of its business with certain vendors, professionals and other parties in interest that may be involved in the Debtor's Chapter 11 case. Verita may also provide professional services to entities or persons that may be creditors or parties in interest in this Chapter 11 case which services do not directly relate to, or have any direct connection with, this Chapter 11 Case or the Debtor.

9. Verita and its personnel in their individual capacities regularly utilize the services of law firms, accounting firms and financial advisors. Such firms engaged by Verita or its personnel may appear in chapter 11 cases representing the debtor or parties in interest. All engagements where such firms represent Verita or its personnel in their individual capacities are unrelated to this Chapter 11 Case.

10. To the best of my knowledge, information, and belief, insofar as I have been able to ascertain after reasonable inquiry:

a. Neither Verita nor any of its personnel has any materially adverse connection with the Debtor, its creditors, the Office of the United States Trustee or any employees thereof, or any party in interest herein;

b. Verita and its personnel are "disinterested persons," as that term is defined in section 101(14) of the Bankruptcy Code, except that Verita was employed by the Debtor prior to the Petition Date as allowed under section 1107(b) of the Bankruptcy Code; and

c. Neither Verita nor any of its personnel hold or represent an interest materially adverse to the Debtor's estate in connection with any matter upon Verita which would be employed. Should Verita discover any new relevant facts or relationships bearing on the matters described herein during the period of its retention, Verita will use reasonable efforts to file promptly a supplemental declaration.

11. No personnel of Verita is related or connected to any United States Bankruptcy Judge or the United States Trustee for this District, or to any employee in the offices thereof.

12. There is no agreement or understanding between Verita and any other person or entity (other than affiliates, employees, and contractors) for sharing compensation received or to be received for services rendered by Verita in connection with this Chapter 11 Case.

13. On May 1, 2023, funds affiliated with GCP Capital Partners LLC ("GCP") indirectly acquired a controlling equity interest in Verita (the "Acquisition"). Pursuant to the Acquisition, an indirect, non-controlling, beneficial minority interest in Verita was acquired by funds affiliated with J.P. Morgan Investment Management Inc. ("JPMIM"). GCP is a middle-market private equity investment firm based in New York. GCP has made investments in a number of industries, including tech-enabled business services, payments, and select financials. JPMIM is a U.S. registered investment adviser. Designees of GCP are members of the Board of Managers (the "Board") of Verita's ultimate parent company, KCC Parent LLC ("Parent"). Parent wholly owns Verita Intermediate, LLC, which in turn wholly owns Verita Global, LLC, which in turn wholly owns Verita Global Services, LLC, which in turn wholly owns Verita. One representative of JPMIM is entitled to attend and observe (but not vote) at all meetings of the Board, but no designee of JPMIM is a member of the Board.

14. Verita searched all entities listed in the list of Potential Parties in Interest against an internal database that includes (i) Verita's parent entities, affiliates, and subsidiaries and (ii) GCP, GCP's funds, and each such fund's respective portfolio companies and investments as set forth in the list most recently provided to Verita by GCP. Based solely on the foregoing search, Verita has determined, to the best of its knowledge, that there are no material connections.

15. Verita has no contract or relationship with XClaim Inc. ("Xclaim") or with any other party under which Verita provides or will provide exclusive access to claims data and/or under which Verita will be compensated for claims data that is made available by Verita. Neither Verita nor its affiliates are party to any agreements where it/they receive(s) consideration in exchange for transferring information derived from its role as a claims agent under 28 U.S.C. § 156(c) to non-client third parties.

16. Verita will comply with all requests of the Clerk's Office and the guidelines promulgated by the Judicial Conference of the United States for the implementation of 28 U.S.C.

§ 156(c).

17. Except as set forth above, I have no connection with the Debtor, creditors, or any party in interest, their respective attorneys, accountants, or the U.S. Trustee, or any employee of the U.S. Trustee.

18. Based on the foregoing, I believe that Verita is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 3, 2026

By: DocuSigned by: Evan J. Gershbein 41878F97BE7747D...

Evan Gershbein
Executive Vice President
Kurtzman Carson Consultants, LLC
dba Verita Global
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Proposed Claims, Noticing and Solicitation Agent for the Debtor