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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.	Case No. 26-25868 Chapter 11 Adv No. 26-_____ **COMPLAINT SEEKING DECLARATORY AND INJUNCTIVE RELIEF UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362 THAT THE AUTOMATIC STAY APPLIES TO THE CHARTER REVOCATION APPEAL**
Highlands Community Charter and Technical Schools, Plaintiff, v. Twin Rivers Unified School District Board of Trustees and California State Board of Education, Defendants.	Judge: Hon. Christopher D. Jaime

Highlands Community Charter and Technical Schools, the above-captioned debtor and debtor-in-possession ("HCCTS" or, the "Debtor"), in the above-captioned chapter 11 case (the "Case" or the "Main Case"), files this Complaint seeking the entry of one or more orders for declaratory and injunctive relief pursuant to Bankruptcy Code Sections 105(a) and 362 and states as follows:

PRELIMINARY STATEMENT

The Debtor seeks declaratory judgment and injunctive relief to enjoin the prosecution and litigation of the pending Revocation Appeal (as defined below) in which the Debtor is a party and/or the Debtor's primary asset is at issue. The relief sought is necessary to maintain the status quo, preserve and maximize the value of the Debtor's estate, promote its reorganization efforts, and further the fundamental policy goals of the Bankruptcy Code.

The Debtor filed this adversary proceeding only because Defendants seek to prosecute the Revocation Appeal against the Debtor despite the filing of the Case and the imposition of the automatic stay. By contrast, in the Audit Appeal (as defined below), which seeks more than $180 million from the Debtor, the California Department of Finance has stated that it does not object to a stay. Permitting the Revocation Appeal to proceed would not only violate the automatic stay, but would amplify deleterious and adverse impacts on the Case and the Debtor's ability to diligently pursue a consensual chapter 11 plan of reorganization and would potentially diminish if not eliminate the Debtor's estate and ability to successfully reorganize. At stake are over one-hundred jobs, the education of over 2,000 current students (currently mid-semester), and far-ranging impacts on the greater Sacramento community.

The Debtor's requested relief is grounded in well-established precedent under Bankruptcy Code Sections 362 and 105(a).

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), and (O). The statutory predicates for the relief requested herein are Sections 105(a) and 362 of the Bankruptcy Code.

THE PARTIES

2. The Debtor is a 501(c)(3) non-profit corporation that owns, manages and operates two charter schools serving adult students in Sacramento County known as Highlands Community Charter School ("HCCS") and California Innovative Career Academy ("CICA" and, together with HCCS, the "Schools"). The Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on October 4, 2026 (the "Petition Date"). The Debtor continues to operate the Schools and manage its financial affairs as a debtor-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

3. Defendant the Twin Rivers Unified School District Board of Trustees is the elected governing body, responsible for the legal and administrative leadership of the Twin Rivers Unified School District. Twin Rivers may be served with process through its Board President, Christine Jefferson at 5115 Dudley Blvd., McClellan Park, CA 95652.

4. Defendant the California State Board of Education is the 11-member governing and policy-making body for California's public K-12 education system, that sets academic standards, curriculum, instructional materials, assessments, and accountability policies. A copy of this lawsuit may be served upon the Office of the Attorney General at 1300 I Street, Sacramento, CA 95814.

FACTUAL BACKGROUND

The Schools' Mission and Community Presence

5. The Debtor is a non-profit corporation that owns, manages and operates the Schools. The Schools are charter schools which are established through a written charter. The charter is a detailed contract between the school's founders and the authorizing school district that sets out the school's educational program, governance structure, academic goals, financial plan, and accountability measures. The Twin Rivers Unified School District is the authorizing entity that issued the Schools' current charters (the "Charters"), first in August 2014 and continuing to the present time. If no action is taken, the Charters' current terms expire on June 30, 2027.

6. While charter schools generally sit outside of traditional models, the Debtor's mission is particularly targeted and unique. The Debtor operates the Schools, which are adult-

learning schools, serving approximately 2,000 students. The Schools provide students aged 22 and older with the opportunity to attend high school and earn a high school diploma (a credential distinct from a General Educational Development (GED) certificate), receive in-person English language instruction, and operate with career and technology certification programs designed to equip students with skills necessary to gain meaningful skills and employment post-graduation.

7. At their core, the Schools exist to serve the most educationally vulnerable populations in the local community, including individuals who could not complete secondary education due to economic hardship, family obligations, or involvement with the criminal justice system, as well as immigrants and refugees resettled in California. The impact of this work reaches well beyond the individual student. Whether affording an adult learner a high school diploma and expanding their career prospects, providing English language instruction to immigrants and refugees, or providing education to individuals whose foreign credentials lack recognition in California, the Schools serve as a vital road to economic self-sufficiency and civic participation. Across all pathways, the benefit is both immediate and long-term as students emerge better positioned to secure employment, contribute to their communities, and navigate the American education and professional landscape. The cumulative effect of these outcomes can generate substantial social and fiscal returns for students, their families, the surrounding community, and government at the local, state and federal levels.

8. Moreover, in many circumstances, the Schools represent the only viable education option for their student population. Whether due to adult obligations that cannot be reconciled with traditional school hours, or a need for robust, tuition-free English language instruction with counseling and other wrap-around support that conventional programs do not provide, the Schools fill a critical gap that other public and charter schools do not fully address. The Schools do not just provide education to the students – they have a food pantry for food insecure students, clothes for students in need, counseling to students facing mental health or other crises, and have helped students find doctors, dentists, optometrists and hairdressers who speak their language and understand their cultural traditions.

9. Many of the students attending the Schools are refugees from Afghanistan who received special permission from the United States government to relocate to the Sacramento area because their lives were determined to be at risk if they remained in Afghanistan. They are not just learning English for the first time; they are learning to read and write as well as learning basic math skills for the first time.

10. Further, the programs provided by the Schools allow students to be more active participants in their own children's education, making it more likely that their children will also do well in school. Many refugees and other students attending the Schools are required to be enrolled in an educational program as a condition of receiving public assistance for housing or other vital services. Thus, closure of the Schools also threatens to undermine critical safety nets that the state and federal government have created to ensure food and housing security for students are met.

The Schools Are Subject to Multiple Levels of Oversight and Annual Independent Audits

11. Charter schools are part of the California public education system, which has multiple levels of oversight for all schools, including agencies at the state, county, and local levels. The first direct level of that oversight for the Schools is its authorizing entity; here, the Twin Rivers Unified School District ("Twin Rivers"). The Schools must (and do) compensate Twin Rivers for that compliance oversight. The Sacramento County Office of Education engages in oversight and also provides assistance to both Twin Rivers and the Schools. At the state level, the California Department of Education is responsible for enforcing education laws and for allocating funding for local educational agencies, the State Board of Education is the policy making body, and the California Commission on Teacher Credentialing provides and enforces licensing and credentialing for educators.

12. The Schools also have an exclusive partnership agreement with the Sacramento Employment and Training Agency ("SETA"), a joint powers agency of the City of Sacramento and County of Sacramento that administers federal Workforce Investment Opportunity Act funding in Sacramento County. All students enrolled at the Schools also must be enrolled in SETA's workforce development programs. SETA provides additional services for students enrolled at the Schools, leading to substantial benefits for these students. Indeed, SETA reports

that 63% of students enrolled in its Workforce Investment Opportunity Act program were employed in the second quarter following exit from the program.

13. Apart from and in addition to this compliance and oversight structure, the Schools are required by law, pursuant to California Education Code § 41020, to undergo annual financial and compliance audits, in accordance with government auditing principles. The audit must be performed by an independent, Certified Public Accountant. The independent auditor must follow the procedures, standards, and requirements established by the Education Audit Appeals Panel ("EAAP"), in its "Guide for Annual Audits of K-12 Local Education Agencies and State Compliance Reporting." EAAP's guide also determines the components of the audit report and the information that must be provided in the report. The EAAP guide is formally adopted through its rulemaking process and is based on and derived from the proposed audit guide submitted by the State Controller's Office, in consultation with the Department of Finance, California Department of Education, and other organizations.

14. At all relevant times, the Schools retained an independent auditor and submitted annual reports. The independent auditor's reports for the Schools for the fiscal years 2019-2020 through 2023-2024 were submitted to and certified by the State Controller's office. The independent auditor's reports for those fiscal years found that the Schools had complied with the requirements for charter schools relating to Attendance, Mode of Instruction, Funding Determinations, Classroom-Based Instructional Minutes, and Charter School Facility Grant Program. The only finding otherwise by the independent auditor related to inaccurate reporting of free and reduced lunch eligibility in the 2022-2023 fiscal year, which the independent auditor acknowledged was due to students turning in documentation late. In sum, the Schools reasonably trusted that their operations were fully compliant with the state's convoluted charter laws.

The June 2025 State Audit Report

15. For years, the Schools operated with operational transparency, receiving clean audits from auditors on the California State Controller's approved list of local education agency auditors, and paying Twin Rivers in excess of $14 million in oversight fees.

16. Rather than extend support to guide these critical institutions through ambiguous adult education funding frameworks, the California Office of the State Auditor issued Report 2024-106 (the "Audit Report") in June 2025 seeking to impose a retroactive, ruinous $180 million penalty based on hyper-technical interpretation of K-12 attendance rules that were never meant for adult learners.

17. The Audit Report is publicly available at the following link: https://www.auditor.ca.gov/reports/2024-106/.

18. Furthermore, by concealing its internal audit methodology and working papers under the guise of misdemeanor laws, the auditor has insulated its own flawed process from public scrutiny and due process. To dismantle a school that has successfully educated thousands of marginalized adults, and has already implemented structural reforms under new leadership, is a deeply political move that prioritizes bureaucratic technicalities over the actual educational empowerment of a community.

19. Notably, the Audit Report did not just attack the Debtor. It explicitly targeted Twin Rivers, the Sacramento County Office of Education, and the California Department of Education (the "CDE") for failing to monitor the Schools.

20. In a thinly veiled defensive maneuver, a mere five days after the Audit Report was issued, on June 30, 2025, CDE sent audit determination letters to the Schools operated by the Debtor asserting, based only on the Audit Report, that it was entitled to repayment of nearly $180 million. Specifically, the audit determination letter for HCCS sought $178,965,128, and the audit determination letter for CICA sought $7,485,445, together amounting to $186,450,573.

21. The CDE's audit determination letters required the Schools to either pay those amounts—in excess of $180 million—through a payment plan, or to appeal the determination to the Education Audit Appeals Panel.

22. The Schools timely filed appeals of CDE's determination letters with EAAP, pursuant to Case Nos. EAAP 25-42 and EAAP 25-36 (the "Audit Appeal").

23. Per the governing California Education Code provisions, both the California State Controller (the "Controller") and the California Department of Finance (the "DOF") are parties to

and named as respondents to the Audit Appeal. However, neither the State Auditor (who issued the Audit Report) nor the CDE (who sent the audit determination letters) are parties to the Audit Appeal. A merits hearing before an Administrative Law Judge was scheduled to begin on October 19, 2026.

24. At issue in the Audit Appeal is a determination of whether or not the Schools must repay the staggering amount – more than $180 million.

25. On October 6, 2026, the DOF filed a response with the Office of Administrative Hearings stating that it "does not object to a stay of the audit appeal hearing in this matter pending the resolution of Highlands's Petition by the Bankruptcy Court." The DOF reserved its right to seek relief from the stay from this Court. The Debtor therefore does not seek relief in this Complaint as to the Audit Appeal. The Debtor reserves all rights as to the Audit Appeal, including the right to oppose any motion for relief from the automatic stay to continue the Audit Appeal on the ground that no cause exists under Section 362(d).

Twin Rivers' School District Board Attempts to Revoke the Schools' Charter

26. At or around the same time the Audit Report was issued, in June 2025, the Twin Rivers Unified School District Board (the "District Board") issued a Notice of Violation for the Schools, alleging violations of the Schools' Charters. Because the Schools had immediately responded to the Audit Report by undertaking significant remedial steps to address concerns presented in the Audit Report, the Schools were able to refute, address, and/or cure all the violations asserted by the District Board.

27. On January 27 and January 30, 2026, the District Board met to consider a recommendation from Twin Rivers staff and counsel, who presented findings and recommended the Charters **not** be revoked based on findings that the Schools had fully cured or refuted all issues in the Notice of Violation and that there was accordingly no basis to revoke the Charters. Nevertheless, in a stunning and inexplicable move, the District Board ignored the recommendation of its own staff and legal counsel and voted to revoke the Schools' Charters. In doing so, the District Board relied only on their prior findings of fact from the June 2025 Notice of Violation.

28. On February 27, 2026, the Debtor, on behalf of the Schools, appealed the revocation of the Charters to the Sacramento County Board of Education ("SCBOE"). On May 19, 2026, the SCBOE held a lengthy public hearing and following a thorough review of the extensive administrative record, SCBOE voted to overturn Twin Rivers' revocation of the Charters by adopting Resolution No. 26 17B.

29. On June 18, 2026, the District Board appealed SCBOE's decision to the State Board of Education (the "Revocation Appeal"). On July 17, 2026, the Debtor filed an opposition to the Revocation Appeal. Even though the appeal process is pending, the working relationship between the Debtor and Twin Rivers has become untenable. Notably, Twin Rivers, as the issuing authority of the Charters, retains the ability to seek revocation of the Charters on various grounds, regardless of the outcome of the Revocation Appeal.

30. On September 30, 2026, the California Department of Education released a state staff report making a recommendation to the State Board of Education and its Advisory Commission on Charter Schools (the "ACCS") that the revocations of the Charters be upheld. A hearing was scheduled on October 6, 2026 before the ACCS to address whether to (i) recommend the State Board of Education to hear the appeal from the District Board, and (ii) recommend that the State Board of Education find that the revocation by the District Board was supported by substantial evidence and should thus be upheld. The ACCS recommended that the California State Board of Education uphold the revocation of the Charters.

31. The State Board of Education is scheduled to consider any ACCS recommendations from the October 6 meeting, in a meeting scheduled for November 12, 2026 to evaluate whether the District Board had substantial evidence that the Debtor was not in compliance with the law or its Charters. If the November 12 meeting proceeds, and the State Board of Education agrees with a negative ACCS recommendation, the Debtor could immediately lose Charters and its funding, and the Schools would face immediate closure on or shortly after November 12, 2026.

32. The DOF does not object to a stay of the Audit Appeal. The Revocation Appeal, however, continues toward a November 12, 2026 hearing before the State Board of Education. If

allowed to proceed, the Revocation Appeal is likely to destroy the Debtor's ability to successfully reorganize.

The Schools Provide Unique Educational Services to the Community

33. If the Revocation Appeal proceeds, imperiling the Schools' very existence, not only the Debtor but the greater community will be deleteriously impacted. The Schools are currently providing educational opportunities to approximately 2,000 adult students, age 22 and older, for the 2026 to 2027 school year. The Schools serve vulnerable populations in the community and provide tuition-free opportunities that are not readily available elsewhere. Traditional schools do not provide all the services available to adult students at the Schools. In addition, most students – given their age – have responsibilities that are not compatible with traditional K-12 school hours.

34. The Debtor's students come from many different countries, and from a myriad of circumstances. In particular, the Debtor serves many students from the large Afghan community living in the Sacramento area. Sacramento is home to one of the largest and most vibrant Afghan communities in the United States, making it a primary hub for Afghan Americans and refugees nationwide. The Debtor serves its many Afghan and refugee students who are seeking to learn English, work, raise their children, and rebuild their lives after experiencing extraordinary hardship.

35. If the Schools were shut down in the middle of the school year, there would be no immediate replacement available to the majority of the students.

36. Not only are the Schools critical for supplying the students' needs, the importance of the Schools to the public and community cannot be understated. The unique mission of the Schools enjoys a tremendous amount of public and community support. The Schools have received letters and support from many organizations, including religious organizations representing multiple faiths to chambers of commerce, organizations focused on anti-recidivism, and organizations that share our mission of serving immigrants and refugees.

37. In addition, at public hearings held by the District Board and the Sacramento County Board of Education, as well as the Schools' Board meetings, many students, employees, other agencies, and public officials have expressed their belief that Debtor's programs are vital to

the community and are worth saving under the stewardship of the Schools' new administrative team.

38. The Debtor is currently seeking a new charter for the Schools from the Sutter County Board of Education ("Sutter County"), which if granted, would begin in the 2027 to 2028 academic school year. Sutter County is scheduled to meet in December 2026, to decide if it will issue the Debtor a new charter for the Schools. If the Revocation Appeal is stayed and Sutter County is willing to issue the Debtor a new charter, the Debtor is confident that it will be able to successfully reorganize around such new charter.

39. Through the Schools, the Debtor seeks to continue on its mission to eradicate educational inequality, promote success in the workforce, and provide students with the necessary opportunities to be self-sufficient members of the community.

CAUSES OF ACTION

Count I: Declaratory Relief Confirming the Automatic Stay Applies to the Revocation Appeal Under Section 362(a)

40. The Debtor incorporates by reference the allegations contained in paragraphs 1 through 39 above as if fully set forth herein.

41. This Court has the discretionary power, pursuant to Bankruptcy Code Section 105(a), to issue declaratory judgments interpreting the scope and application of the automatic stay provisions under Section 362(a).

42. Upon the filing of the Petition, Bankruptcy Code Section 362(a) imposes an immediate, automatic stay of litigation and other proceedings against the Debtor and its property. Specifically, Section 362(a)(1) stays the "commencement or continuation... of a judicial... proceeding against the debtor... or to recover a claim against the debtor," Section 362(a)(3) stays "any act to obtain possession of property of the estate or of property from the estate or to exercise control over such property," and Section 362(a)(6) stays "any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title."

43. The Revocation Appeal in which the Debtor is named as a party is subject to the automatic stay under Section 362(a)(1). The Revocation Appeal seeks to revoke the Schools'

Charters, which would end the ability of the Debtor to operate the Schools and provide educational services.

44. The continued prosecution of the Revocation Appeal will also require the Debtor, which has limited administrative and financial resources, to engage in extensive, time consuming and costly preparation for, and participation in, hearings in the Revocation Appeal, to the detriment of not only the Debtor but also the Debtor's estate and any potential claimants. The Defendants are actively seeking to proceed with the Revocation Appeal, including the November 12, 2026 hearing before the State Board of Education, and the Debtor will be forced to appear and defend to protect its own interests.

45. Furthermore, the Debtor has cured or refuted every violation asserted in the Notice of Violation, as Twin Rivers' own staff and counsel found and SCBOE confirmed. The Revocation Appeal therefore does not serve a pressing public policy or regulatory purpose to prevent ongoing harm.

46. There exists a genuine controversy between the Debtor and Defendants of sufficient immediacy and reality to warrant the issuance of a declaratory judgment. A prompt judicial determination of the respective rights and duties of the parties is necessary and appropriate. Accordingly, the Debtor seeks declaratory judgment that:

a. The automatic stay under Section 362(a) applies to the Revocation Appeal because the Debtor is named as a party;

b. The automatic stay under Section 362(a) applies to the Revocation Appeal because it implicates property of the estate, including but not limited to the Schools' Charters;

c. Any acts to continue prosecution, hearings, and appeals in the Revocation Appeal violate the automatic stay and are void; and,

d. The automatic stay applies to any future proceedings that Defendants may seek to actively prosecute or litigate against the Debtor during the pendency of this Case.

47. The Debtor expressly reserves all rights, claims, defenses, and remedies available to it under applicable law, including but not limited to the right to seek additional relief under Section 105(a) or other provisions of the Bankruptcy Code as circumstances may warrant.

Count II: Injunctive Relief Under Section 105(a) to Stay the Revocation Appeal

48. The Debtor incorporates by reference the allegations contained in paragraphs 1 through 47 above as if fully set forth herein.

49. Bankruptcy Code Section 105(a) grants this Court with broad equitable power to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title," which includes the power to enjoin third-party actions that might impede the reorganization process. *Purdue Pharma*, 666 B.R. at 468; *see also Marshall v. Picard (In re Bernard L. Madoff Investment Securities LLC)*, 740 F.3d 81, 87-93 (2d Cir. 2014).

50. An injunction under Section 105(a) is urgently required because Debtor satisfies all elements required for injunctive relief under Section 105(a) and Bankruptcy Rule 7065.

51. The Debtor possesses a reasonable likelihood of successfully reorganizing under chapter 11, provided that the efforts to revoke its Charters are stayed, such that its operational funding and its authority to operate is preserved during the restructuring process and it is afforded the breathing room necessary to negotiate and implement a comprehensive resolution of claims. Courts assessing a preliminary injunction in the bankruptcy context evaluate "the prospect of a successful reorganization" and "whether the debtors are substantially more likely to reorganize with the injunction in place." *Purdue Pharma*, 666 B.R. at 469. Courts "do not demand certainty of the successful reorganization; they expect only reasonable prospects of such." *In Re Soundview Elite Ltd.,* 543 B.R. 78, 119 (Bankr. S.D.N.Y 2016), cited in *Purdue Pharma*, 666 B.R. at 469.

52. The likelihood of a successful reorganization is threatened by the Revocation Appeal which directly implicates and would substantially diminish the bankruptcy estate, undermining the Debtor's ability to reorganize.

53. If the Revocation Appeal proceeds and the State Board of Education upholds the revocation, the Debtor could lose its funding immediately and the Schools would close on or shortly after November 12, 2026. The Debtor and its estate will suffer irreparable harm absent an injunction staying the Revocation Appeal, including, but not limited to, the depletion or elimination of the assets which constitute a significant portion of the resources available to fund a plan of reorganization; the diversion of key personnel essential to the reorganization process to

manage and participate in the Revocation Appeal; and the potential elimination of the Schools' Charters, which is a critical asset necessary for the Debtor to successfully reorganize. In contrast, if the Debtor obtains a new charter from Sutter County, the Debtor's ability confirm a chapter 11 plan and successfully reorganize is all but assured.

54. The balance of hardships weighs decidedly in favor of granting the injunction, as any delay in the Revocation Appeal will be temporary, while denial of the injunction would severely and irreparably impair the Debtor's ability to reorganize.

55. The public interest strongly favors the requested injunctive relief. First, it serves the fundamental bankruptcy policy of equitable distribution among similarly situated creditors. Second, it promotes the efficient resolution of ongoing complex litigation involving multiple parties and claims. Third, it preserves the key asset of the Debtor, the Schools' Charters, to allow the Debtor to reorganize. Fourth, it facilitates the continuation of the unique adult-based educational opportunities that benefit the broader community, extending not just to the Schools' students but to the local economy and workforce in the broader community. The public interest is heavily served by keeping the Schools operational to provide adult literacy, vocational training, and high school diplomas to marginalized populations while this Court oversees a transparent financial restructuring and claims resolution.

56. Based on these elements, the Debtor is entitled to a preliminary injunction order under Section 105(a) enjoining the Defendants, their agents, and employees from continuing, enforcing, or adjudicating the Revocation Appeal against the Debtor during the pendency of the Case, or until further order of this Court.

57. The Debtor reserves all rights to seek additional or modified relief as circumstances may warrant.

PRAYER FOR RELIEF

WHEREFORE, the Debtor respectfully prays for judgment as follows:

1. For a declaration that the Revocation Appeal is stayed pursuant to Section 362(a)(1) of the Bankruptcy Code for the duration of the stay period;

2. For a declaration that the Revocation Appeal is stayed pursuant to Section 362(a)(3) of the Bankruptcy Code as an action seeking to obtain possession of or exercise control over property of the estate;

3. For a declaration that any acts taken to continue prosecution, discovery, hearing preparation, merits hearing, determination, and/or appeal in the Revocation Appeal violate the automatic stay and are void;

4. For a declaration that the automatic stay applies to any future proceedings that Defendants here may seek to actively prosecute or litigate against the Debtor during the pendency of this Case;

5. In addition, and in the alternative, for an injunction pursuant to Bankruptcy Code Section 105(a) barring the litigation and prosecution and enforcement of the Revocation Appeal during the pendency of this Case, or until further order of this Court;

6. For costs of suit incurred herein; and,

7. For such other and further legal and equitable relief as this Court deems just and proper.

Dated: October 13, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By *_/s/ Ori Katz_*
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