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Proposed Counsel for Debtor and Debtor in Possession

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. 26-02134 DCN: SMR-1
Highlands Community Charter and Technical Schools, Plaintiff, v. Twin Rivers Unified School District Board of Trustees and California State Board of Education, Defendants.	Hearing Information Judge: Hon. Christopher D. Jaime Date: November 10, 2026 Time: 11:00 a.m. Place: Courtroom 32, Department B 501 I Street Sacramento, California 95814

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NOTICE OF HEARING ON MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

PLEASE TAKE NOTICE that on October 13, 2026, Highlands Community Charter and Technical Schools, the above-captioned debtor and debtor-in-possession (the "Debtor"), filed its *Motion for an Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion") in the above-captioned adversary proceeding, and that a hearing on the Motion (the "Hearing") is scheduled to take place before the Honorable Christopher D. Jaime, United States Bankruptcy Judge for the Eastern District of California - Sacramento Division, on **Tuesday, November 10, 2026, at 11:00 a.m. (Pacific Time)** in Courtroom 32 (Department B) at 501 I Street, Sacramento, California 95814.

PLEASE TAKE FURTHER NOTICE that by the Motion, the Debtor seeks entry of one or more orders for declaratory and injunctive relief as follows:

1. A declaration that the automatic stay under Section 362(a) applies to all efforts by Defendants and their agents to enforce, collect, or give effect to the Revocation Appeal, as defined below, against the Debtor or property of the estate;

2. A declaration that the automatic stay under Section 362(a) applies to such administrative enforcement efforts because they constitute acts to obtain possession of, or exercise control over, property of the estate, including the Schools' Charters and the Debtor's funding;

3. A declaration that any acts to enforce, collect, or give effect to any revocation of the Charters violates the automatic stay under Section 362(a) and are void;

4. A declaration that the automatic stay applies to any future enforcement action by Defendants seeking to revoke the Charters, during the pendency of this Case; and

5. In addition, and in the alternative, an injunction pursuant to Bankruptcy Code Section105(a) extending the automatic stay under Section 362(a) to bar Defendants from any revocation of the Charters, during the pendency of this Case, or until further order of this Court.

PLEASE TAKE FURTHER NOTICE that the Motion is based on the memorandum of points and authorities, the previously filed Declaration of Jonathan Raymond in Support of Chapter 11 Petition and First Day Motions (the "Raymond Decl.") [Main Case No. 4], the exhibits

thereto [Main Case No. 5], the concurrently filed *Declaration of Ori Katz in Support of Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* ("Katz Decl.") and the concurrently filed *Exhibits in Support of Declaration of Ori Katz in Support of Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* ("Katz Exhibits"), all pleadings, papers, and records on file with the Court, and such other evidence, both oral and documentary, as may be presented to the Court at or before the time of the hearing.

NOTICE IS FURTHER GIVEN that the matter will be conducted simultaneously: (1) in person, at the United States Bankruptcy Court, Eastern District of California, Sacramento Division, located at 501 I Street, Courtroom 32 (Department B), Sacramento, California, 95814, (2) via ZoomGov Video, (3) via ZoomGov Telephone, and (4) via CourtCall. Should you appear at the Hearing, you may choose to appear by any of these options. Parties who wish to appear at the Hearing remotely should sign up by 4:00 p.m. one business day prior to the Hearing. Information regarding how to sign up can be found on the Remote Appearances page of the Court's website at https://www.caeb.uscourts.gov/Calendar/RemoteAppearances. Each party who has signed up will receive a Zoom link or phone number, meeting I.D., and password via e-mail. If the deadline to sign up has passed, parties who wish to appear remotely must contact the Courtroom Deputy for the Department holding the Hearing. Telephonic appearances may be arranged at least 24 hours in advance of calendared hearings through Court Conference at 1-866-582-6878.

NOTICE IS FURTHER GIVEN that the Motion is filed pursuant to Local Rule of Practice 9014-1(f)(1). If you do not want the Court to approve the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must do all of the following:

a. On or before **October 27, 2026,** file with the court a written opposition complying with the requirements of Local Rule of Practice 9014-1(f)(1)(B), explaining your position, and serve your opposition. Your opposition must be filed at 501 I Street, Suite 3-200, Sacramento, California, 95814. **If you do not timely file a written opposition, the Court may deem the**

Motion unopposed, remove the Motion from the calendar, rule on the Motion before the Hearing, and may strike any untimely written opposition. Simply appearing at the Hearing is not sufficient to protect any rights you may have.

b. Any opposition or response must be filed and served on the Debtor and its bankruptcy counsel as listed on the upper left-hand corner of the first page of this notice, and any other party that has requested notice in the above-captioned adversary proceeding.

c. Attend the hearing scheduled on **November 10, 2026, at 11:00 a.m.** at the United States Bankruptcy Court, Sacramento Division, 501 I Street, Courtroom 32 (Department B), Sacramento, California, 95814, before the Honorable Christopher D. Jaime, United States Bankruptcy Judge. If you or your attorney do not attend, the Court may decide that you do not oppose the relief sought in the Motion and may enter orders granting the relief requested.

NOTICE IS FURTHER GIVEN that you may determine whether the matter has been resolved without oral argument or whether the Court has issued a tentative ruling and may view (any) pre-hearing dispositions by checking the Court's website at www.caeb.uscourts.gov after 4:00 p.m. the day before the Hearing. Parties appearing telephonically must view the pre-hearing dispositions prior to the Hearing.

NOTICE IS FURTHER GIVEN that this Notice does not contain all the particulars of the Motion and supporting documents, nor does it summarize all the evidence submitted in support of the Motion. For further specifics concerning the Motion and the relief requested, you are encouraged to review the Motion and the supporting evidence, including the supporting declarations, copies of which may be obtained from the website, https://www.veritaglobal.net/hccts free of charge.

You may also access these documents from the Court's PACER system (requires a subscription). The web page address for the United States Bankruptcy Court for the Eastern District of California is https://www.caeb.uscourts.gov/, which includes a link to the Court's Case Management/Electronic Case Filing System (CM/ECF system) and PACER registration.

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NOTICE IS FURTHER GIVEN that your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Dated: October 13, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By */s/ Ori Katz*
ORI KATZ
AMANDA L. COTTRELL

Proposed Counsel for Highlands Community Charter and Technical School