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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.	<u>Hearing Information</u> 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

DECLARATION OF ORI KATZ IN SUPPORT OF MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Ori Katz, declare as follows:

1. I am a partner in the Finance and Bankruptcy Practice Group of the firm Sheppard, Mullin, Richter & Hampton LLP ("Sheppard Mullin" or the "Firm"), and as such am authorized to make this declaration on behalf of Sheppard Mullin. I am an attorney licensed to practice law in all of the courts of the State of California and in all of the United States District Courts in California. I am proposed counsel for Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), the debtor and debtor-in-possession, in the above-captioned chapter 11 case. The Debtor 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").

2. The matters stated herein are true and correct and are within my personal knowledge or information provided to me by the Debtor, and if called upon to testify as a witness, I could and would testify competently thereto.

3. I submit this declaration in support of the *Debtor's Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and* 362 (the "Motion").

4. The Schools are supported by the public and the community due to their unique mission, as explained in the Declaration of Pat Fong Kushida, the President and CEO of the Sacramento Asian Pacific Chamber of Commerce, which is attached as **Exhibit A** to the concurrently filed Exhibit List.

5. Teachers who currently work at the Schools likewise support the Schools' mission, and insights from just some of those teachers are set forth in declarations from Anna Mozghova, Anthony Khang Nguyen, Asya Grigoryan, Christina Schiesari, Daniel Bubela, David Trussell, Demetrius Houpis, Douglas Hirsch, Farhat Amin Haroon, Graham Touray, Halima Hussani, Jake Martinson, James St, Jonathan Leggett, Joshua Nghiem, Julie Giger, Kenia Rumaldo, Khalida Nezami, Khrystsina Talstyka, Lawrence Stinson, Lyubov Chorney, Megan McMullan, Mohammad Asif, Natalia Lowey-Ball, Nataliia Maksymiv, Nicole Kafarova, Olga Musteata, Olga

Voznuk, Pada Moua, Parisa Samadi, Russell Patty II, Ryan Lutgen, Salvador Cruz-Alvarez, Sky Fuller, Stacey Williams, Stefania Sideri, Stephen Fowler, Svetlana Brunner, Tom Pearson, Uriel Medina, and Zia Ul Haq Habibi, which are attached as **Exhibit B** to the concurrently filed Exhibit List.

6. In addition to teachers, the Schools have the support of staff members, and viewpoints and perspectives of just some of those staff members are set forth in declarations from Adam Graham, Alina Hoi, Alla Nikolaiets, Amanda Martinez, Andrew Michaud, Anna Semenko, Asker Aslanov, Catherine Thirkill, Charles Husted, Cindy Ly, Claudia Hernandez, Daisy Vasquez, Ekaterina Koliadina, Francisco Javier Hernandez, Guadalupe Raygoza, Iuliia Chemiaeva, Juan Moreno, Kateryna Fedorova, Mohammad Amiri, Moharram Payman, Mujtaba Shokori, Nataliya Torchilo, Parvin Monsef, Reeta Barstad, Shaima Ahmadzai, and Zoriana Labaz, which are attached as **Exhibit C** to the concurrently filed Exhibit List.

7. Finally, some of the students currently attending the Schools explain the importance of the Schools to them personally, as set forth in declarations from Abdul Jalil Osmani, Abdul Qayoom Nezami, Abdul Rahim Rahimi, Abdullah Salarzai, Adbul Qayum Ahmadzai, Akhund Zada, Jahun Zeba, Ali Hussain Ahmadi, Alina Qudosi, Alizada Tahera, Amina Ahmadi, Ana Ramirez, Angelica Acosta, Atayee, Bibi Fazila, Aziz Mohammad Popal, Aziz Rahman, Aziza Quraishi, Bebi Qabila Rohiyat, Behrow Daqiq, Bibi Rukhshana Nazari, Delroba Saif Ali, Denis Balykov, Denis Pena, Esperanza Rocha-Mercado, Eva Quiroz, Fahmia Rasooli, Faiz Mohammah Noori, Farida Omarkhil, Farmanullah Archiwal, Fataneh Sadat, Fatima Nazari, Feda Bebi Nooristani, Galina Ostapenko, Ghuncha Gul Ahmadzai, Hashmatullah Azeemy, Hasil Bibi Shirzad, Homa Nursi, Ilkhomjon Akhunov, Jesus Daniel Morales Ruiz, Kahlil Ahmad Ahmadi, Kateryna Chohlo, Khatera Qauomi, Kimya Mohammad Yar, Lidia Chouadra, Lisa Paiva, Liudmyla Nosko, Liudmyla Riabychenko, Lucia Mares, Marwa Rahimi, Mina Rahimi, Mohammad Kabir Qurbani, Mohammad Massoud Rasa, Mohammad Rafiq Passon, Mohammad Sabir Salar, Mohammad Sharif Mohammad Qasim, Mohibullah Salarzai, Monica Orellana, Monica Ortiz Resendiz, Muhibullah Ahmadi, Nahida Saberi, Najeebullah Rohiyat, Nasema Anwari, Noor Bigmam Roshan, Noorzia Behsudwal, Olga Potrebcova, Oriakhail, Nazifa,

Palwasha Niazi, Pamela Pamatz, Parwin Dawrankhil, Paryma Azizi, Qudsiya Rezaiee, Rahman Sayeeda Ahmadzai, Ramzia Ataiee, Rohina Amani, Rohina Azimi, Romal Shah Beshudwal, Roya Sadat, Samira Amini, Sanobar Shayaan, Shafiqa Hamat, Shakiba Rashidi, Shamima Azizi, Shamsa Alkassem, Sharifa Ahadi, Shazia Ahmadzai, Shiba Ahmadyar, Shir Mohammad Radpoor, Sima Azizi, Sohaila Ahmadi, Sulhiya Nawrozi, Suraya Rahimi, Svetlana Dziova, Tania Macias De Rueda, Teresa Reyes, Wajia Azizi, Zakia Ahmadi, Zar Pari Nuristani, Zarghona Amani, and Zholina Sadatin, which are attached as **Exhibit D** to the concurrently filed Exhibit List.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 13th day of October 2026, at San Francisco, California.

/s/ Ori Katz
Ori Katz