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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. 26-02134 DCN: SMR-1 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
Highlands Community Charter and Technical Schools, Plaintiff, v. Twin Rivers Unified School District Board of Trustees and California State Board of Education, Defendants.	

EXHIBITS (PART I) 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

Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case, 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") and hereby submits the following exhibits in support of the *Declaration of Ori Katz in support of Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and* 362.

Exhibit	Description	Page(s)
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Dated: October 13, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By */s/ Ori Katz*
ORI KATZ
AMANDA COTTRELL
Proposed Counsel for Highlands Community Charter and Technical School

EXHIBIT A

DECLARATION OF THE SACRAMENTO ASIAN PACIFIC CHAMBER OF COMMERCE IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Sacramento Asian Pacific Chamber of Commerce, hereby declare as follows:

1. I am a member of the community served by Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on the community I am part of. The Sacramento Asian Pacific Chamber of Commerce (SacAsian) is a nonprofit business association in Sacramento, California. and one of the region's leading voices for small business. SacAsian is committed to advancing economic opportunity for all, developing a strong workforce, and supporting rural entrepreneurs, veteran-owned businesses, and community-based enterprises.

SacAsian views small business success as a source of strength and opportunity, and we advocate for thousands of business owners in our region, providing the technical support, resources, and advocacy they need to thrive as part of an economy for all. SacAsian works closely with HCCTS to develop the workforce pipeline needed to support existing employers, attract new investment, and create economic opportunities. HCCTS is a long-standing educational partner whose adult learners contribute to the region's workforce.

4. In my experience, HCCTS plays a valuable role in the community. HCCTS is not a traditional high school. It serves adults who have not earned a U.S. high school diploma, including immigrants, refugees, English-language learners, working parents, low-income adults, and people seeking a second chance at education, many of whom might not otherwise have access to a tuition-free path to a high school diploma, English-language instruction, or career and technical training. For many students, graduation is the first U.S. high school diploma earned in their family. HCCTS combines diploma completion, English-language development, career and technical education, workforce preparation, and student support services in a single program, which is especially important for adults balancing school with work, children, transportation, and language barriers.

5. HCCTS is important to the community I am part of because of the opportunities it provides to the students and families it serves. HCCTS is a direct bridge between education and employment. Students can earn a high school diploma while receiving career and technical training designed to move them into jobs that can support their families. A student who earns a diploma, develops an occupational skill, and moves into higher-wage employment can increase household income, fill a workforce need for an employer, and bring greater economic stability to their family. That is the kind of workforce pipeline SacAsian works to build for the businesses and residents of our region. I am not aware of another school or program in the area that offers the

same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and support services that HCCTS provides.

6. HCCTS also supports the local economy and community more broadly, including through its workforce, its relationships with local vendors and service providers, and the spending and economic activity generated by its students, employees, and operations. It is my understanding that HCCTS purchases goods and services from local businesses, landlords, vendors, and contractors. Those expenditures become revenue for local businesses, employee wages become household spending on housing, groceries, childcare, and services, and students themselves earn and spend money throughout their communities. I am aware of a prior economic analysis finding that HCCTS's operations and related spending generated tens of millions of dollars in regional economic activity and supported hundreds of direct and indirect jobs.

7. If HCCTS were forced to close or stop operating, it would disrupt the education of the students it currently serves, in the middle of the school year, and would affect the families, employees, and organizations connected to HCCTS. For many of these students, closure would not mean changing schools. It could mean the end of their education. Students close to earning a diploma may never complete it, adults completing occupational training may lose their pathway into higher-wage employment, and refugees learning English may lose access to both language instruction and job preparation. A closure would also interrupt the workforce pipeline that SacAsian works with HCCTS to build for regional employers.

8. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption. Adult schools and community colleges provide important educational opportunities, but I am not aware of one that could replace the combination of diploma completion, English-language development, career training, and individualized support that HCCTS provides.

A closure would also have broader effects on the local economy and community that rely on HCCTS and the students, employees, and families connected to it, including lost wages and local economic activity, fewer qualified workers for Sacramento-area employers, and greater instability for immigrant, refugee, and low-income families.

9. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and the community can continue to benefit from the services it provides.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.

Pat Fong Kushida, President & CEO

EXHIBIT B

DECLARATION OF ANNA MOZGHOVA IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Anna Mozghova, hereby declare as follows:

1. I am a Science Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. HCCTS has had a profound and meaningful impact on both my personal and professional life. I currently serve as a Science Teacher and Lead Teacher, but my connection to HCCTS began long before I became an educator here. I was once a student at this very school, and I personally experienced the opportunities and support that HCCTS provides. As an immigrant

from Ukraine, I faced the challenges of adapting to a new country, learning English, and rebuilding my professional identity. Before attending HCCTS, I explored other educational institutions, but I did not find the same comprehensive and integrated approach to adult education. HCCTS offered something unique: a combination of English language instruction, academic education, and individualized support that helped me not only improve my English but also earn my diploma, complete college, and, most importantly, regain the confidence and sense of purpose I had before immigrating to the United States. Having experienced this journey myself, I understand firsthand how transformative HCCTS can be for adult learners. I know that this school offers much more than academic instruction. It gives people an opportunity to rebuild their lives, recognize their potential, and move forward with dignity and confidence. My personal experience as a former HCCTS student is one of the main reasons I chose to return as a teacher. Today, I have the privilege of helping students who face many of the same challenges I once faced, and I am deeply committed to providing them with the opportunities that changed my own life.

4. Teaching at HCCTS is different from teaching at a traditional school because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while managing employment, family responsibilities, and other challenges. I teach Biology and Science to adult learners from diverse cultural, linguistic, and educational backgrounds. Many of my students are immigrants and refugees with limited English proficiency, and some have experienced interrupted or limited formal education. Others arrive with professional experience and advanced education from their home countries but struggle to use their knowledge and qualifications because of language barriers. I adapt my instruction through hands-on activities, visual materials, translations, differentiated assignments, and practical applications of science. My goal is not only to teach academic content but also to help students develop independence, confidence, and skills they can use in everyday life.

5. n my experience, HCCTS plays an essential role in helping adult students overcome barriers to education and personal development. I recognize many of my own experiences in the students I teach. I understand the frustration of having knowledge and abilities but being unable to communicate them effectively in a new language. I have observed students who initially struggled to understand basic instructions gradually become more independent, participate in classroom activities, use educational technology, and demonstrate their knowledge. These accomplishments may appear small, but for adult learners who are rebuilding their lives, they represent meaningful progress. HCCTS provides a supportive environment where students can develop English language skills while continuing their academic education and working toward future opportunities. Based on my personal experience attending different educational institutions, I have not found another program that provides the same combination of educational opportunities and individualized support that I experienced at HCCTS.

6. HCCTS is deeply meaningful to me both personally and professionally. My journey from being a student at this school to becoming one of its teachers represents an important achievement in my life. I am now able to help students facing many of the same challenges I once experienced. This gives my work a purpose that extends beyond teaching academic subjects. HCCTS has also provided me with opportunities for professional development and leadership, including my current responsibilities as a Lead Teacher, through which I support fellow educators and contribute to instructional improvement. My employment provides financial stability for my family and three children. More importantly, it allows me to use my education, experience, and personal journey to make a positive difference in the lives of others.

7. HCCTS contributes to the broader Sacramento community by providing educational opportunities to adults who might otherwise face significant barriers to continuing their education. Many of our students are parents, workers, immigrants, and refugees who are

striving to create better futures for themselves and their families. I have observed how education helps students become more confident in communicating, understanding important information, navigating everyday responsibilities, and participating in their communities. As a teacher, I see the importance of helping students develop practical skills, including understanding health and safety information, using technology, and applying scientific knowledge to real-life situations. These benefits extend beyond individual students. When adults become more educated and independent, their families and communities can benefit as well. My own experience demonstrates how educational opportunities can help an immigrant continue their education, rebuild a professional career, and eventually contribute to the same community as an educator.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently teach in the middle of the school year. This would create significant financial and professional uncertainty for me and my family. As a mother of three children, stable employment is important for meeting our household responsibilities. A sudden closure would also interrupt my professional development and the leadership responsibilities I have recently undertaken. However, the impact would extend beyond the loss of my employment. Having personally experienced the opportunities HCCTS provides, I understand how important continuity and support can be for adult students. Losing the ability to guide my students through their educational journeys would be particularly difficult because I know how much determination and effort many of them have invested in returning to school.

9. A closure would also cause significant harm to students and the broader community. Based on my direct experience, many HCCTS students would face serious challenges transitioning to another educational institution. Some have very limited English proficiency, transportation difficulties, demanding work schedules, childcare responsibilities, or histories of interrupted education. Many have worked hard to establish trust with their teachers, become

comfortable in the classroom, and develop the confidence necessary to participate in learning. A sudden disruption could cause students to lose academic progress, motivation, and access to the support systems on which they rely. I know from my own experience how difficult it can be to navigate educational opportunities as an immigrant and how important it is to find a program that addresses multiple needs at the same time. Today, I teach students who are at stages of their educational journeys similar to those I once experienced. I am deeply concerned that closing HCCTS could prevent some of them from completing their education and achieving the opportunities that helped transform my own life. I am not aware of another nearby school that could immediately accommodate these students while providing the same combination of educational services and individualized support without significant disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Anna Mozghova

DECLARATION OF Anthony Khang Nguyen IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Anthony Khang Nguyen, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. Although I am a new teacher who started working in August, I put in great effort and have seen other educators and administrators put in great effort for one mission: to provide education for second-chance adult learners. My focus is ELA 1-2, which means I work

primarily with lower-level immigrant students. I love providing instruction and opportunity to practice and get used to English in such a meaningful way for English language learners.

4. Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. Before this, I taught English Language Development in a traditional K-12 public school. HCCTS is different not because of the curriculum but because the students are motivated and dedicated to learning English while taking care of their family. The differentiation needed to teach such a vast population is motivation enough for me to teach here.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. There were students who did not know any English; some didn't even know how to read and write in any language. Yet, they came consistently to HCCTS and within the few months I've been their teacher, I have seen them independently sound out and blend words, memorize common important vocabulary, and string together complete sentences. Giving immigrants the ability to understand and communicate in the language of the country they chose to move to is extremely important and it makes a dramatic difference in their lives, families, and communities. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. As a second-generation immigrant, my parents came to California as refugees of the Vietnam War, and my mother attended an adult school for ESL not unlike HCCTS. This school and its purpose is important to me because it is a way I can repay and continue the educational system that supported

my family through their most difficult times. That learning goal, regardless of the population it focuses on, is what drives me.

7. HCCTS is part of the broader community it serves. Teaching the local community is perhaps the most important outreach assignment that the school provides to the community. I have students a short bus ride away that wouldn't get an education if they had to travel any farther. Aside from that, the school provides counseling and student services for struggling students.

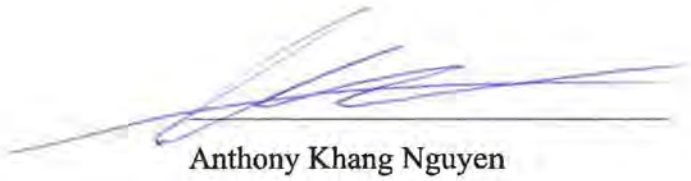
8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. I would lose my income, which means I wouldn't be able to stay in this part of California unless I somehow land another teaching position halfway through the school year. Stopping in the middle of the school year would be extremely detrimental to every teacher working at HCCTS.

9. A closure would also harm the students and the broader community. There are not enough adult schools that can serve the ESL population in Sacramento and its surrounding areas. Adult learners are important and they deserve accessible education that helps them integrate into America and push them to get their diploma and perhaps advance onto trade school or college. I have students who say they want to be teachers and nurses. Some want to open their own businesses. By closing this school, those dreams would be so much harder to achieve, if not completely impossible. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Anthony Khang Nguyen

DECLARATION OF ASYA GRIGORYAN IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, ASYA GRIGORYAN, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have had the honor and privilege of serving this community since 2020. As a daughter of immigrant parents, I know firsthand how challenging it is for immigrants to navigate a new life in the United States. After I learned English in kindergarten, I quickly became the language broker in my family. From translating medical conditions to filling out legal applications,

I felt an immense sense of pride *and* pressure to help my family. The work that we do matters because we are not teaching our adult learners English. We are also giving them the confidence and independence to advocate for themselves, so their children don't have to carry that weight the way I did.

4. Working at HCCTS is different from working at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I might teach them English, but they teach me so much more. Some of my students work evening shifts and still show up to class the next morning. Others are raising children, caring for aging parents, or starting over in their fifties and sixties. Their resilience reminds me every day why this work matters, and it pushes me to be a better teacher for them.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have had close to a hundred students earn their high school diploma during my time here. Many continued their education at a community college or began new jobs and careers. For example, one of my former graduates recently shared that she was admitted into law school. Another texted me, "I signed the offer! I will be a student auditor at the Franchise Tax Board." Being a part of their journey is my *why*. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. I have evolved as an educator throughout the years. Highlands has supported me in earning my Adult Education and Single Subject credentials. I was also inspired to pursue two Master's degrees on my own because I want my students to have access to a high-quality education from a teacher who is as committed to learning as they are.

7. HCCTS is part of the broader community it serves. Highlands partners with local organizations, including Lao Family Community Development, to offer whole-student support. We also have a student services team that includes a social worker and multilingual navigators who connect students and their families with resources in the community.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year.

9. A closure would also harm the students and the broader community. We currently have over 2,000 enrolled students. Unfortunately, there is not enough space for all of our students at other programs. For example, I work as a part-time professor at a local community college, and my waitlists are always full. The lowest level my college offers is novice-high, but many HCCTS students are pre-literate, so they would not be ready for even that level. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Asya Grigoryan

DECLARATION OF Christina Schiesari IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Christina Schiesari, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I am an ELA teacher who has been with Highlands since fall 2021. I came to Highlands from UC Davis, where I spent more than a decade teaching language and literature. Several of my colleagues from UC Davis had joined Highlands and had spoken highly of the

school and its students. When our ESL program at Davis sunset due to Covid-19, I applied to teach at Highlands, and have been with Highlands ever since.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach English 9-12, but currently I am teaching two sections of English 9 and two sections of English 12. My experience teaching the students at Highlands has been one of the most rewarding experiences of my career. The students are balancing many life challenges, yet they choose to add education among all their other priorities and responsibilities. I am constantly amazed and humbled by the experiences these students have undergone, and the sacrifices they have made and continue to make to survive and thrive in a complicated and often unfair world.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. For many students, earning a high school diploma is much more than completing a graduation requirement; it is a pathway out of poverty and toward greater financial stability and independence. I have seen students who have faced significant obstacles persevere, earn their diplomas, and begin to see possibilities for their futures that may not have seemed attainable before. For students who are learning English, developing language skills opens doors to employment, higher education, meaningful community participation, and the ability to become productive and contributing members of society. Perhaps most importantly, HCCTS gives students access to opportunities that can change the course of their lives. By developing academic knowledge, English-language proficiency, work skills, confidence, and career readiness, students are better prepared to pursue meaningful careers and support themselves and their families. When one student gains the education and skills needed to succeed, the impact often extends beyond that individual to their children and future generations. I have witnessed HCCTS serve as a bridge

between the challenges students face today and the opportunities they can achieve tomorrow. The education and support provided here can break cycles of poverty, create pathways to career success, and ultimately help students build a stronger and more hopeful future for themselves, their families, and their communities. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. As a career educator and one who has spent the bulk of her adult life in institutions of learning, teaching at HCCTS provides constant affirmation that my path is both meaningful and purposeful. Teaching is my identity, my superpower, and that which sustains me intellectually and emotionally. My position here at HCCTS is more than just my job, it is the expression of my life's work as well as validation for having chosen a career in service.

7. HCCTS is part of the broader community it serves. Our CTE partners and local community affiliates all work hand in hand to serve our students. I have seen HCCTS partner with community support agencies like La Familia to support students in need of community resources. Robust investments in our Student Services department has helped students in crisis by providing them with counselors and social workers who work tirelessly to assist students with their needs and challenges. HCCTS also provides job opportunities for graduated students and their families, continuously working towards strengthening community ties and building meaningful relationships.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at HCCTS would devastate my family and me. As a single parent and head of household, I would be unable to pay my mortgage, my car payment, and all the other

household expenses that are only increasing in the current economic reality facing all of us today. I also would not be able to support my daughter in times of need. Finally, I would have to abandon my students in the middle of the school year, effectively shattering their dreams as well as my own.

9. A closure would also harm the students and the broader community. Students who have worked so hard and are so close to graduating will have to start over or finish elsewhere where they won't feel the kind of support that nurtures them here at HCCTS. Newcomer ELLs will lose access to professional ELD teachers and staff who are both culturally aware and responsive to student needs. Education provides adult learners with a pathway to better employment, higher wages, greater financial stability, and increased independence. Many of our students are working to improve their circumstances while also supporting families and managing other responsibilities. HCCTS gives them an opportunity to strengthen their academic and English-language skills, earn credentials, and develop the knowledge and confidence necessary to pursue better career opportunities. For some students, continuing their education may be the difference between remaining in low-wage employment and gaining access to a career that provides greater economic security for themselves and their families. The benefits also extend far beyond the individual student. When adults become more educated, financially stable, and engaged in their communities, their families and neighborhoods benefit as well. Educated adults are better positioned to help their children succeed in school, contribute to the local workforce, support local businesses, and participate more fully in their communities. They also bring valuable perspectives, experiences, languages, skills, and cultural knowledge that strengthen the community as a whole. There is also a broader civic benefit. A community is stronger when more of its residents have the education and knowledge necessary to understand issues, evaluate information, communicate effectively, and participate meaningfully in civic life. Adult education helps build an

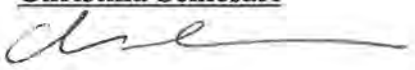
informed and engaged electorate and gives people the tools they need to contribute to the democratic process and advocate for themselves, their families, and their communities. For these reasons, I believe closing HCCTS would not simply mean losing a school building or educational program. It would mean removing an important pathway to economic mobility, family stability, workforce development, and civic participation. The disruption would be felt not only by the students who depend on HCCTS, but also by the families, employers, neighborhoods, and broader community that benefit from their success. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Christina Schiesari



DECLARATION OF DANIEL BUBELA IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, DANIEL BUBELA, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I teach high school English for grades 9 and 11. Before I taught high school English, I was teaching level 0-3 English for Work and Life, which is our English as Second Language (ESL) courses. My parents were immigrants from Ukraine; therefore, I can understand the struggle of many of our immigrant students. All our students are trying to balance their work and education; many came to Highlands because of the amount of support students get on their journeys to learn English and receive their high school diplomas.

4. Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. Again, as

a teacher I am given the flexibility to differentiate and support my students as necessary. Adult students need flexibility because they are dealing with obstacles in life that are not simple to handle. Highlands offers many different locations, and because of this, students in different areas, who do not have access to transportation, can easily visit the closest location to receive an education.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. The students that come to Highlands are mostly immigrants. As immigrants students come to the U.S. with almost nothing, and have to start over. Other students who are not immigrants, also struggle with various obstacles in their lives. Highlands offers an education that focuses on the student need, it offers flexibility for all students. Students have access to 504/IEP services that help create a specific learning plan for struggling students. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Having a job during this uncertain economic time is helping me support my family. The fear of losing my job creates anxiety for me as a teacher and sometimes makes it hard to provide quality instruction.

7. HCCTS is part of the broader community it serves. Highlands has become a hub for students who seek to learn English and/or receive their high school diploma. Many adult schools in the area do not have capacity to serve the need in Sacramento, they are limited by their districts. Highlands is a program that focuses solely on adult learners and does so by offering a flexible program in many locations across Sacramento. With the advancement of technology and innovation in education, schools are moving to more individualized, choice-based programs. Where school districts can no longer be a monopoly on education. Learners of all ages are given the agency to choose their educational goals. Highlands is paving the future for what educational programs should look like in a competitive market; student-focused, easily accessible and quality education.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. I am the sole provider in my family, if I lose my job, then my family will be greatly impacted;

especially in the middle of the year. Many schools are not hired in the middle of the year so it will be hard to find another job. Likewise, students who are progressing through their credits will have wasted their time and would have to find other programs. Since students might face starting over their progress, many might not find the motivation to keep going and just stop pursuing their diplomas in general.

9. A closure would also harm the students and the broader community. Students will be impacted the most because of the rely on Highlands being open to finish their diplomas. Many students do not have an adult school close to their home, and for many that do live next to an accessible adult school, the waiting lists are so large, that getting in will take a significant amount of time; time that many students do not have because they need to find jobs to support their families. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Daniel Bubela

DECLARATION OF David Trussell IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, David Trussell, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools , a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I Personal Finance, and a Real Estate School. I have been at HCCTS for 5 years now. I retired from a 30 year career in the Lending and Real Estate industry and I wanted to give back and pay forward for all this knowledge I have built over my career.

4. Working and teaching at HCCTS is different from working at a traditional school, because our students are adults who are working toward a high school diploma, learning English,

or developing career and technical skills while also managing jobs, families, and other responsibilities. In my experience, HCCTS plays an important role in the lives of the students it serves. Our student population is primarily immigrants who come to the United States for various reasons, and at the core of each one of them is to build a better life for themselves and their families. One of the classes I teach is "Personal Finance" where the basics of money management are new to most of our students. Teaching them the simplicity of managing their finances that will allow them to buy a home, or a car and moreover, a future are extremely satisfying when I hear of stories that my students received a credit card, saved money, bought a car and much more; for the first time in their adult lives, is the most gratifying experience. My next class I teach is Real Estate. Students take this course to receive their California Real Estate license to get a job and a future. This is at the core of what HCCTS does and the impact to our students and priceless. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

5. HCCTS is also important to me personally and professionally. I am extremely humbled by the dedication our students have to learn, and build their future in a new country. Being part of that journey is more gratifying than the 30 plus years in my professional career.

6. HCCTS is part of the broader community it serves. In my field specifically, I have provided many affiliates to come in and speak in my classes from local banks, title companies, real estate companies, and financial advisors. Some of my students have been employed by these associations and have a career now!

7. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year.

8. A closure would also harm the students and the broader community. Closing would have a profound impact on my students who have worked tirelessly over the last few years to learn English, get a high school diploma and be an integral part of society.. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

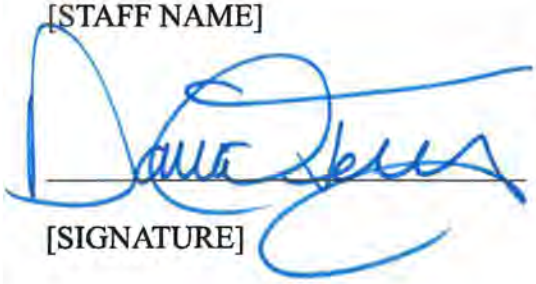
9. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

David Trussell

[STAFF NAME]



[SIGNATURE]

DECLARATION OF DEMETRIUS HOUPIS IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Demetrius Houpis, hereby declare as follows:

1. I am a Demetrius Houpis currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I am an adult grade one and two social science teacher. I have been at this school for two months. I came here to support HCCTS's mission in improving the lives of those in our society that are economically disadvantaged. As Franklin D. Roosevelt once said (1937): "The test of our progress is not whether we add more to the abundance of those who have much; it is

whether we provide enough for those who have too little." During my time here thus far, I have seen an organization that has upheld this worldview.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. On a daily basis, I improve my students' literacy skills, critical thinking skills, and knowledge about history, civics, economics, and geography.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. Based on my own observations, I have seen the impact HCCTS has had on its students. It is more than just about helping them earn a diploma, learn English, and gaining job skills. I have seen students develop the agency necessary to impact their families and communities in a positive way. This only happens with teachers that are skillful in developing their students' critical thinking and social emotional skills. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. This is primarily because I know how hard it is to adapt to a new language, culture, and country from my own personal experience living abroad. I also know that poverty and inequality, or the threat of it, creates a society that is very unstable from my own research conducted for my master's degree. My wife is also an immigrant and I have seen first hand the struggles she has experienced during her transition. I find it meaningful to share what I have learned with my students to help them be successful.

7. HCCTS is part of the broader community it serves. This is by providing adult learners with educational opportunities, helping them overcome barriers to education, develop

career skills, and achieve their academic and professional goals. These efforts strengthen local families, the workforce, and the broader community.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at HCCTS would disrupt my professional career and my ability to continue serving the students I currently teach. Finding another teaching position in the middle of the school year could be challenging and would create uncertainty regarding my continued employment. Furthermore, I would lose the opportunity to contribute to an educational mission that reflects my professional experience and values.

9. A closure would also harm the students and the broader community. Based on my observations, a closure would significantly disrupt the educational progress of students who already face considerable challenges. Many of my students are immigrants developing the literacy, language, and critical thinking skills necessary to participate more effectively in society. I have seen students develop greater confidence, independence, and the ability to contribute positively to their families and communities. A sudden closure would interrupt this progress and disrupt the relationships and learning environment that support their development. I believe this would also negatively impact the broader community by limiting opportunities for educational advancement, economic mobility, and civic participation. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Demetrius Houpis, MAT

DECLARATION OF DOUGLAS J. HIRSCH IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, DOUGLAS J. HIRSCH, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the ate hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I recently completed my seventh year of employment at Highlands Community Charter School. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach English to newcomer immigrants.

4. In my experience, HCCTS plays an important role in the lives of the students it serves. The effect is generational. When children see parents value and pursue education, it inspires them to do the same. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

HCCTS is also important to me personally and professionally. I cannot speak to past budgetary abuses. Teachers' views can be myopic – we see our class, our students, our school site. What I have seen for the better part of a decade are dedicated, hardworking staff, and diligent, motivated students.

5. HCCTS is part of the broader community it serves. On the issue of closing the school, I urge everyone to think long-term. We will not "save money" by eliminating Highlands Community Charter. The bottom line is that we are cultivating a valuable human resource – generations of skilled tax-paying workers who will contribute to our economy in ways we have yet to imagine. Highlands Community Charter is a community service worth protecting, nourishing, and growing.

6. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. The loss of income amid the currently high inflationary trend would have a devastating impact on our family's finances. A closure would also harm the students and the broader community.

7. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

8. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.

Douglas J. Hirsch

DECLARATION OF FARHAT AMIN HAROON IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Farhat Amin Haroon, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I currently work as a Student Services Navigator at Highlands, where I support students in various ways to help them overcome barriers, access essential resources, and achieve their educational and personal goals. Having the opportunity to work with Highlands again has been especially meaningful to me, and I am grateful to be part of this community.

4. One of the primary reasons I chose to work with Highlands is its unique, multicultural environment and its strong commitment to serving diverse communities. At Highlands, we work collaboratively to support students who are striving for a better future for themselves and their families. For many of these students, Highlands represents a second chance to pursue an education, develop their communication skills, build confidence, and create new opportunities for their future. Being part of this mission is deeply meaningful to me because I see firsthand how important these services are to the students we serve and how much they depend on the opportunities Highlands provides.

5. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. My main responsibility is supporting students and staff with language support and navigating every possible resource in enabling the students to overcome their day-to-day life challenges as most of them embark their new lives here in the community and are on their paths in shaping their own future.

6. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen how Highlands impacted the students in many different ways enabling them to achieve what they want. This could be giving many adult students the chance to learn English, get their High School Diplomas, learn a new skill, get community and social support, and find a job to support their day-to-day life for themselves and their loved ones. I should say that most of these students see Highlands as their second chance to educate themselves as many of these students are newcomers into the community. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

7. HCCTS is also important to me personally and professionally. For me working with Highlands is not just a place to work, it is my second home where I feel humbled and privileged that I am able to support all those students that needs our support in order to overcome their social and academic challenges as we closely work with them on daily basis in navigating the different paths and resources. And for me as a household head of 6, Highlands is our only place where I can work and provide end needs for my dependents.

8. HCCTS is part of the broader community it serves. It does not only give hope and the chance of education for the students, but their impacts are way more across the community by providing community level support services for the students and their families such as; shelter, food, health, career, transportation and many other forms where community comes on daily basis and get their needed support. So Highlands in broader terms is a lifeline for many community members.

9. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue teaching the students I currently work with, in the middle of the school year. This is one of my biggest frustrations right now, I am the single income earner of my household with my wife still a student and my 4 little kids, losing my job is a nightmare for us. If I lose my job with Highlands that means we will be unable to provide essential needs for our families.

10. A closure would also harm the students I teach and the broader community. Most of the students we serve are adult learners seeking a second chance at education, as well as newcomers striving to build better futures for themselves and their families. Closing Highlands would mean taking away a vital lifeline from thousands of community members who rely on our services every day. Such a closure would significantly limit their access to education, reduce their opportunities for personal and professional growth, and create additional barriers to achieving self-sufficiency. Rather than empowering these individuals to stand on their own feet, pursue meaningful employment, and contribute to their communities, the closure could increase their dependence on

government assistance and place an even greater burden on public resources. Highlands provides these learners with more than an education; it offers hope, opportunity, and a pathway toward independence and a brighter future. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

11. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue teaching the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Farhat Amin Haroon

DECLARATION OF GRAHAM TOURAY IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Graham Touray, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been teaching at Highlands for about three years; I have always wanted to teach adult English to English learner students, and Highlands offered me the opportunity to do so full-time. It also let me connect with more English learning students from the community than any other position.

4. Teaching at HCCTS is different from teaching at a traditional school because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. It requires a greater degree of flexibility and understanding, but the students are

incredibly motivated and hardworking. I also feel that I am making more of an impact as the students we serve at Highlands simply do not have the same options as traditional students; other adult schools and community colleges are already struggling to serve the many students in the community due to capacity limits. This was dramatically exacerbated by the downsizing at the end of the 2024-2025 school year. I feel that I am contributing to a valuable service when teaching at Highlands.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. Even at the higher levels I have mostly taught, I have seen substantial improvement in both English ability and confidence. I have also been lucky enough to help dozens of students reach graduation and earn their high school diploma. I know of one student in particular who has found gainful work in a pharmacy thanks to the CTE course Highlands used to offer prior to the downsizing. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Highlands represents one of very few opportunities for me to teach English to immigrant learners full-time. It is also the only tuition-free option I am aware of, which makes the work all the more meaningful.

7. HCCTS is part of the broader community it serves. It offers many services that help our students outside of the classroom such as food pantries, clothing drives, mental health support, and career counseling. Some of these were affected or removed as a direct result of the 2025 downsizing, but I still have faith that we can grow back to the point of providing these services again.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. I would be left without a full-time income and would need to consider leaving the community I have become so attached to.

9. A closure would also harm the students and the broader community. Many of our students would lose their education access as there are not many other options for improving their

English or earning their high school diploma, even fewer that are tuition-free. Adult schools in the area are already at capacity, and I have seen firsthand that even options like American River College are struggling to find enough teachers for the many students seeking an education. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 9th day of October, 2026, at Sacramento, California.

Graham Touray

DECLARATION OF Halima Hussani IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Halima Hussani, hereby declare as follows:

1. I am an Early Childhood Education Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. I am over the age of eighteen and am 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students, I teach and support. I am currently employed as an Early Childhood Education Teacher at Highlands Community Charter and Technical Schools. Through my work at HCCTS, I have had the opportunity to support adult learners as they continue their education and work toward their personal, educational, and career goals. Teaching has been an important part of my life for nearly 14 years, including my experience teaching in Afghanistan and the United States. I chose to teach at HCCTS because I value education and believe that every person deserves an opportunity to learn, improve their skills, and build a better future, regardless of their age or background.

4. Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. Many of our student's balance school with employment, family responsibilities, and other challenges while working toward a high school diploma, learning English, or preparing for a career. As an Early Childhood Education Teacher, I teach students about child development, the physical, cognitive, social, and emotional needs of children, and the relationships between children, families, and caregivers. I help students understand important concepts, develop practical knowledge, and prepare for opportunities in the early childhood education field. I also recognize that students have different English language abilities and educational needs, so I work to explain lessons clearly and make the learning process accessible to them.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen how important it is to provide adults with a learning environment where they can continue their education while managing their other responsibilities. For some students, returning to school as an adult requires courage, determination, and a willingness to overcome difficult circumstances. HCCTS gives these students an opportunity to continue learning, develop confidence, and prepare for better employment opportunities. Through career and technical education programs such as Early Childhood Education, students can gain knowledge and skills that may help them pursue employment and further training. I believe that the combination of adult education, English language instruction, career training, and student support makes HCCTS an important resource for the people it serves. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. because teaching is more than a job to me; it is a profession that allows me to make a positive difference in people's lives. After many years of teaching, I continue to find meaning in helping students learn new things, overcome challenges, and work toward their goals. My position at HCCTS allows me to use my teaching experience to support adult learners and help them prepare for their futures. My

employment is also important to my family's financial stability and my ability to meet our household responsibilities. Losing my position would create uncertainty for my professional future and my family's financial well-being. I value the opportunity to continue teaching and serving students through HCCTS.

7. HCCTS is part of the broader community it serves because it provides educational and career development opportunities to adults who may face barriers to continuing their education. By helping students improve their academic knowledge, English language skills, and career-related abilities, the school supports their efforts to become more prepared for employment and greater independence. In my Early Childhood Education classes, students learn about the care, development, and safety of young children, which can help prepare them for roles working with children and families. These educational opportunities can benefit not only individual students but also their families, future employers, and the wider community. I believe that supporting adult education and career training helps strengthen the community by giving more people opportunities to develop their skills and contribute to the workforce.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently serve. Losing my employment would affect my income, professional stability, and ability to meet my family's financial responsibilities. It would also interrupt the work I have invested in preparing lessons, supporting students, and helping them progress toward their educational and career goals. Finding another suitable teaching position could take time, and a sudden loss of employment would create uncertainty for me and my family. I would also lose the opportunity to continue developing my work in career and technical education and support adult learners during an important period in their education.

9. A closure would also harm the students and the broader community. served by HCCTS. Based on my experience teaching adult learners, students need consistent instruction, guidance, and support to stay engaged and make progress toward their goals. If the school closed during the school year, students could lose their current learning environment, experience interruptions in their classes, and face difficulties finding another program that meets their educational needs and schedules. Students who are balancing school with work and family

responsibilities could face additional challenges if they had to locate another school or restart their educational plans. Students enrolled in career and technical education programs could also experience delays in developing the knowledge and skills they need to pursue employment opportunities. I believe that keeping HCCTS open would allow students to continue their education with less disruption and would help preserve an important educational resource for the community. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Halima Hussani

DECLARATION OF JAKE MARTINSON IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Jake Martinson, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at HCCTS for over 3 years, and I was drawn to the organization by the opportunity to serve underserved adult populations, especially immigrants and English Language Learners. In the past I have taught ESL classes, however I am currently teaching high school math.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. As a math teacher, I work hard to help my students grasp math skills and concepts

which are challenging for them, but relevant and applicable to their daily lives. I care deeply for my students and want to see them succeed academically, professionally, and personally.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. HCCTS has provided crucial support to our students, helping them earn a high school diploma, learn English, and integrate into US society. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. I have enjoyed being part of a dedicated team of professionals who are passionate about educating students and skilled in doing so. My work with HCCTS has also provided a steady income and benefits which enable me to support my own family's material needs.

7. HCCTS is part of the broader community it serves. Many of my students have been able to improve their lives after receiving education and other services from HCCTS.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. If I lose my employment with HCCTS in the middle of this school year, I will be without income and benefits to support my family of four. It is very difficult to find employment as a teacher in the middle of the school year.

9. A closure would also harm the students and the broader community. Closing the school would be a major disappointment for our students and bring major obstacles to them reaching their goals. At a time when immigrants and other vulnerable populations are already facing so many hardships, closing HCCTS would be yet another painful blow to a group of people who have already endured so much pain and difficulty. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.

Jake Martinson

DECLARATION OF James St. Clair IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, James St. Clair, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been an employee of this school since October 2019. In that time, I have helped countless students achieve their goal of earning a high school diploma.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. Currently, I am working with English language learners (mainly Afghan refugees) who are transitioning to their new lives in America.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen numerous students in my classes develop their basic academic skills, giving them the ability to improve their families' economic circumstances. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Seeing my students gain the skills and confidence they need to improve their lives has been the highest honor of my teaching career.

7. HCCTS is part of the broader community it serves. Through our partnerships with local refugee resettlement agencies, HCCTS has helped countless newcomers adjust to their lives in this country. Furthermore, our partnerships with local colleges and technical schools have put numerous students on the path to meaningful, well-paid careers.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Personally, my family would also lose access to the health and retirement benefits offered by the school. This could eventually lead to me taking my skills and training elsewhere beyond California.

9. A closure would also harm the students and the broader community. Nearly 2,000 students would lose access to educational resources in the middle of the school year. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this twelfth day of October, 2026, at Sacramento, California.

James B. St. Clair

James St. Clair

DECLARATION OF JONATHAN LEGGETT IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Jonathan Leggett, hereby declare as follows:

1. I am a ninth-grade English teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at HCCTS as a teacher since 2020, after serving as a substitute teacher in 2019. As a substitute, I was drawn to the school's mission of helping immigrant and justice-involved adults learn English and earn high school diplomas. My mother was not a native English speaker, and I witnessed the challenges she faced. With the support of a community school, she learned English and built a fuller life in her community. Her experience helped inspire me to apply to HCCTS, where I was hired shortly before the COVID-19 shutdown in 2020. Since then, I have taught English and served as a teacher on special assignment, supporting administrators in school improvement efforts, including work following the school's most recent audit. I have

personally observed significant changes, including new leadership and a new board, and believe the school has made meaningful progress in addressing past concerns.

4. Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach ninth-grade English and English language development to adult learners, many of whom have experienced interrupted schooling, displacement, war, or other trauma. My instruction includes reading, writing, and English communication, as well as advisory lessons on health, employment and careers, citizenship, and practical skills for participating in the community. I work directly with students who are balancing education with work, family responsibilities, and the challenges of learning a new language. I have met students who assisted the United States military and later came here seeking safety and opportunity. My work requires adapting instruction to different English proficiency levels while helping students build confidence and make steady academic progress.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen students develop their English skills, earn diplomas, and pursue opportunities that once seemed out of reach. Some of my former students have gone on to graduate from college, own businesses, or enter skilled trades. For these students, a diploma and stronger English skills open pathways to further education, training, employment, and greater independence. I have also seen how important a supportive learning environment is for adults whose education was disrupted or denied. These outcomes are not theoretical to me; I have witnessed them in students I have taught. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. This work is deeply personal because I recognize in my students some of the barriers my mother overcame. Helping them gain the language and educational skills to participate more fully in society gives purpose to my career. I recently became a father to a son named River. When I think about his future, I hope he grows up in a community that values its diversity, takes accountability seriously, and invests in

people who are working to build better lives. I believe HCCTS contributes to that future. My position also provides financial support for my household while my wife stays home to care for our infant son.

7. HCCTS is part of the broader community it serves. I have seen HCCTS collaborate with local workforce and community organizations, including the Sacramento Employment and Training Agency (SETA) and the Department of Human Assistance (DHA). In my experience, HCCTS and these agencies refer people to one another to connect students with education and workforce preparation. I have also seen the schoolwork with faith-based community partners serving newcomers. These relationships help adults strengthen their English skills, prepare for employment, and participate in the Sacramento community. They also reflect the trust built through continued cooperation among local organizations.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position would cause immediate financial hardship for my family. I am currently our household's sole wage earner, and my wife is at home caring for our young son. My income supports our day-to-day needs, and an unexpected loss of employment would leave us facing serious uncertainty at a particularly vulnerable time as new parents. I would also lose work to which I have devoted years of my professional life and the opportunity to continue supporting students whose progress I know firsthand.

9. A closure would also harm the students and the broader community. Students have told me directly that they do not know what they would do if HCCTS closed. Some fear losing the educational support and English-speaking community they have worked so hard to join. Based on my experience with these students, I believe an abrupt closure would interrupt their progress toward diplomas, English proficiency, and career goals, and could discourage some from continuing their education. Many need instruction and support responsive to trauma, limited prior schooling, and beginning English proficiency. In my view, local alternatives, including community colleges and adult education programs, would face serious challenges serving this population immediately and at the same scale. A closure would also disrupt relationships with community and workforce partners

that help students transition into further training and employment. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Jonathan Leggett

DECLARATION OF JOSHUA NGHIEM IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Joshua Nghiem, hereby declare as follows:

1. I am an English Language Development Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have served as a ELD and ELA teacher for HCCTS for 6 years. My family experienced very traumatic events similar to our student population. We escaped the Vietnam War as refugees and were given a second chance at life in the United States. I know how to difficult it is to lose everything and start over fresh with nothing in a foreign country with a different culture and language. Had HCCTS existed during that time, my family would not have suffered through poverty and living paycheck to paycheck for the last 30 years. I do not want this experience for our newcomer immigrant and refugees. HCCTS provides social services, flexible education, survival English, career opportunities, a high school diploma, and much more for their students. It is my

personal mission to ensure that we create a bridge and a pathway for my community to move from survivability to sustainability. Students to be given the tools, resources, training, and guidance for success, whether it be higher education or finding a job that can provide for their families. I believe in the mission of HCCTS.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach English Language Development. My curriculum and lessons are tailored to giving my students the necessary English to survive in the United States. I focus on practical language learning that students need to use immediate in real-life contexts such as going to the bank, going to the DMV, U.S. Citizenship preparation, mock job interviews, writing resumes, professional English for the workplace, going to the hospital and pharmacy, and going to student-teacher conferences for their children.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I've witnessed students of every background, English proficiency, and stage in life succeed in many different ways. My Muslim female students who were never offered an opportunity to get an education in their home country learn how to pick up a pencil and write. My students who could not form a sentence, both spoken and written, and are now able to write paragraphs and 5-paragraph essays. My students who were formally incarcerated, homeless, and/or experience substance abuse complete their courses and receive a high school diploma as well as complete CTE programs which guided them to a career that was sustainable for them and their families. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. HCCTS gives meaning to education. Many times, educators complain about the inequities and issues within our education system for the last few decades. I believe that HCCTS is the forerunner school to solve these issues. Education must look different and be flexible for these populations of students. When

I chose to become an educator, I could've easily went to a school in a rich district where students are privileged and have their whole future planned ahead of them. However, this was not my purpose and calling. I want to help those who have fallen through the cracks of our education system and those who need help the most. Helping these students would be the same as helping my own family. If our school closes down, it would heavily affect the community and school districts at all levels. Elementary school students would have a higher percentage of parents who are not literate or cannot speak English, the workforce would have less qualified candidates that do not possess high school diplomas and/or cannot speak English, the community college and college would lose a significant amount of students who do not qualify to register due to a lack of high school diploma.

7. HCCTS is part of the broader community it serves. HCCTS has partnered with several organizations such as Opening Doors, SETA, IRC, Bach Viet, Lao Family, etc. that support immigrants and refugees in many ways. We provide the education while these organizations provide the social services. We also provided workforce opportunities. We contact local businesses for employment opportunities, provide mock interview trainings, assist in resume writing to prepare our students find employment for them.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. I provide for my own family. I have a disabled father and a mother who is also working to provide for our family. I support my two younger brothers by putting them in college to pursue their majors and careers. If I lose my position, my family would be heavily devastated and possibly live in destitute.

9. A closure would also harm the students and the broader community. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Joshua Nghiem

DECLARATION OF Julie Giger IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Julie Giger, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at Highlands Community Charter and Technical Schools since January 2023. I was drawn to this school and this work because I am an ardent believer in the power of education to change lives and the mission of the school to eradicate educational inequity is one I am honored to be part of. The immigrant, refugee, and re-entering demographic that Highlands serves is often overlooked in our educational landscape. There are simply not enough adult education options for our learners to pursue a high school diploma and set the educational foundation needed to achieve their goals. Free, quality education is a basic human right and our students – no matter who they are or where they come from – deserve equal access to the

educational opportunities that will help them become productive members of our society and build the futures they envision for themselves. Our school focuses on supporting those who are often overlooked, left behind, or fallen through the cracks. By meeting our students where they are and supporting them in their pursuit of education and a high school diploma, we are impacting not only their lives, but the lives of their families and children, as education has a powerful, long-lasting impact for generations.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. The majority of my students are immigrants and refugees; English is their second, third, or even fourth language. Many have found themselves starting life anew in the United States, with little support and few resources to depend upon. My students come with a beautiful diversity of backgrounds; some were doctors, engineers, teachers, lawyers, and business owners in their home countries. Some are entering into formal education for the first time in their lives. Most of my students work – often multiple jobs – to put food on the table and keep the lights on for their families. Despite these incredible challenges they are faced with, they are resilient and determined to complete their education. My students do their homework late at night, after they've worked all day and put their children to bed. They come to class right after their work shift, tired but determined. As an ELA/ELD teacher, I help students who are learning to read and write for the first time and students with advanced degrees from their country, who only need access to English and a high school diploma to reach success in our country. It is an honor and a pleasure to share in their success and celebrate every educational milestone and every credit earned with them.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. Our students are learning English, pursuing a high school diploma, and receiving Career Technical Education. These educational offerings from HCCTS lead to students not only graduating, but finding sustainable, gainful employment at a livable wage. Our students pursue their education through many obstacles, yet they still make it to the graduation stage. HCCTS, its programs, and its dedicated staff have helped so many students learn English, learn a skill, and –

most importantly – walk across the graduation stage to earn their diploma. Our programs are tailored for adult students who are working their way through education in a non-traditional way. This is the positive impact Highlands has on the people of our community: education provided in a way that works for them. I have had the privilege of witnessing students rebuild their lives after fleeing war; I've celebrated students returning to school in their 50s, 60s, 70s, because they've finally realized that it's their time and that their future matters. And we are here to help them succeed where other institutions have let them down. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Through my years as a teacher at HCCTS, I have deepened my pedagogical knowledge and honed my craft as a professional. I've had professional development opportunities, support, and training beyond what I've experienced at past places of employment. On a personal level, I am able to work with a demographic of students who are often overlooked in society and left behind. The students at Highlands are our fellow community members, our neighbors, the parents of our children's friends. Serving our community through their success is deeply rewarding. Working at a school like Highlands is proof that the system *can* work for those who have typically been left behind; it is a sign that the values of our community and our country – that anyone, no matter who you are or where you're from, can find success – are still alive and well.

7. HCCTS is part of the broader community it serves. Through partnerships with local organizations such as Lao Family and sharing resources from organizations such as Sacramento Works, we are an essential touchpoint and connection between our students and the community around them.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing this position would have significant financial ramifications for myself and my family. As the higher earner in my household, my income is essential for keeping my family afloat – just

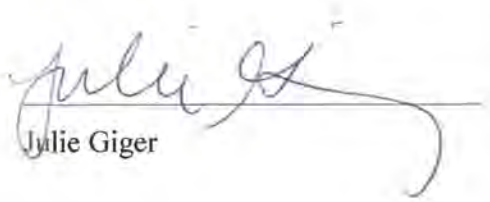
at Highlands' educational offerings are essential for our students' abilities to keep their families going. Were the school to close or cease operations, I – like so many others – would be faced with the uncertainty of how I will pay my mortgage and support my family. As an experienced educator, the pay cut I would have to accept for other employment would be devastating to my family. What parts of my own future will be sacrificed with the loss of this employment?

9. A closure would also harm the students and the broader community. There is a serious lack of educational opportunity for adult learners to pursue their high school diploma in Sacramento. If HCCTS were to cease operations, hundreds and hundreds of students would be left without a path forward. The traditional system already left them behind; they need another way. So many of my students would lose their educational opportunity if HCCTS closed. Many cannot afford to pay for community college classes. Many lack the resources or transportation to travel to the few places remaining. Highlands fills a need in the Sacramento area – if not us, then who else will ensure these students have equitable access to a high school diploma and all of the opportunities it affords? I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Julie Giger

DECLARATION OF KENIA RUMALDO IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, **Kenia Rumaldo**, hereby declare as follows:

1. I am a Social Science teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at Highlands for nearly four years, one as a paraeducator and three as an adult education teacher, teaching various subjects and English learners at different proficiency levels. Currently, I teach Social Science to beginning-level adult English learners. As a military spouse who relocated to the area, I was drawn to Highlands because of its mission to

provide educational opportunities to underserved adults. I wanted to be part of something meaningful, where I could make a difference in people's lives. Highlands has given me the opportunity to grow as an educator while helping students build confidence, achieve their goals, and create better futures for themselves and their families.

4. Teaching at HCCTS is different from Teaching at a traditional school because our students are adults working toward a high school diploma, learning English, or developing career and technical skills while managing jobs, families, and other responsibilities. I currently teach Social Science to beginning-level adult English learners and have previously taught History, Government, and Economics to students at various academic levels. Working directly with Highlands students has been incredibly rewarding. Many balance work, family responsibilities, and education while striving for a better future. I have witnessed their determination, growth, and confidence as they develop their English skills and pursue their goals. Being part of their journey and knowing that their success can positively impact future generations is what makes my work so meaningful.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. As a teacher at Highlands, I have witnessed firsthand how education transforms lives. I have seen students improve their English, earn high school credits and diplomas, gain confidence, and pursue better employment opportunities. Many of my students balance demanding jobs and family responsibilities, yet remain determined to succeed. What touches me most is seeing their accomplishments inspire their children and other family members to pursue education as well. Highlands does more than provide an education; it gives students hope, opens doors to new opportunities, and creates lasting change for generations to come. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma

completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Teaching at Highlands is meaningful to me because I have the opportunity to make a difference in the lives of adults who are working toward a better future for themselves and their families. As a military spouse, finding stability and opportunities for professional growth can be challenging due to frequent relocations. Highlands gave me the opportunity to build a meaningful career, grow as an educator, and provide stability for my own family. I am grateful to work for an organization that not only changes students' lives but has also positively impacted mine.

7. HCCTS is part of the broader community it serves. I have seen Highlands positively impact local communities by helping adults improve their English, earn their high school diplomas, and develop skills that open doors to better employment opportunities. Many of my students work in construction, agriculture, and local businesses, contributing to the community every day. By supporting their education, Highlands helps strengthen the local workforce and empowers families to build brighter futures. Its impact extends beyond the classroom, creating opportunities for economic growth and generational progress within our communities.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at Highlands would have a significant emotional and financial impact on my family. As a military spouse, finding stable employment and building a career can be challenging due to relocations. Highlands has provided me with financial stability, professional growth, and a sense of purpose. Losing this opportunity would not only affect my family's financial security but would also mean leaving behind a career I have worked hard to build and the

students I am deeply committed to serving. Highlands has given my family stability and me the opportunity to make a meaningful difference.

9. A closure would also harm the students and the broader community. Based on my experience, closing Highlands would be devastating for students and the communities we serve. Many of my students balance demanding jobs, family responsibilities, and financial challenges, yet remain committed to improving their lives through education. For some, Highlands is one of the few accessible opportunities to learn English, earn a diploma, and build a better future. I have witnessed firsthand how losing access to educational programs can leave students discouraged and with limited options. A closure would not only interrupt their education but also affect their families, the local workforce, and the generational progress they are working so hard to achieve. I am not aware of another nearby school that could immediately accept HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Kenia Rumaldo

DECLARATION OF Khalida Nezami IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Khalida Nezami, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been working at Highlands for the past five years. When I first came to the U.S.A, my family and I had escaped Afghanistan after the Taliban took over. I was going throough a difficult time and didn't know where to start my life in a new country. Highlands opened its doors to me. I first enrolled as a student and later became a paraeducator. With support and encouragement I received I continued my education and became a teacher. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach English to adult students

and many of them are immigrants and refugees. Some of my students are learning English for the first time and some have never had the opportunity to attend school before. I help them develop their speaking, listening, reading and writing skills. I see how hard they work to improve their English while taking care of their families and other responsibilities.

4. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen students who could barely speak English when they first started become more confident and independent. They learn how to communicate with doctors, teachers and people in their communities. My own family is a good example. Both of my sisters graduated from Highlands two years ago and now they are attending college to become medical assistants. My parents also attend Highlands. Before that they had never taken English classes. Now they can communicate with cashiers, talk to people at parks, and speak with their doctors. Seeing all these changes in my family and students show me how important Highlands is. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

5. HCCTS is also important to me personally and professionally. Highlands gave me the opportunity when I needed the most. It helped me start my career in education and encouraged me to continue my studies. It also helped my family build a better future and I will always be grateful for that.

6. HCCTS is part of the broader community it serves. I have seen how Highlands helps immigrants and refugees to become more independent and involved in their communities. Students learn English, earn diplomas and get familiar with new culture.

7. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my job would be difficult for me and my family both financially and emotionally. I have spent five years building my career at Highlands and I deeply care about my students. It would heartbreaking leave them in the middle of their education.

8. A closure would also harm the students and the broader community. Many of my students have jobs, children and other responsibilities and attending school is already a challenge for them. If Highlands closed they could lose the opportunity to learn English and achieve their goals. Some students might not find another school that meets their needs and others might stop their education completely. I have seen how much Highlands means to my students and I believe closing the school would take away an important opportunity from people who are trying to build their future. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

9. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Khalida Nezami

DECLARATION OF Khrystsina Talstyka IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Khrystsina Talstyka, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at HCCTS since 2019, first as a teacher and then in administration for the past three years. I am passionate about supporting students and providing opportunities for them to improve their lives and achieve their educational and personal goals.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I currently teach English as a Second Language (ESL) to adult students. It is a privilege to share my knowledge and experience with students who are committed to learning and

continuing their education despite life's challenges and obstacles. Hearing their success stories and knowing I have played a part in their growth and achievements is one of the most rewarding aspects of my work.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. From my experience, HCCTS helps students improve their lives by giving them the opportunity to learn English, communicate more confidently, and pursue their goals. Many students come to us with degrees and professional experience from their home countries but face language barriers and lose confidence in a new environment. HCCTS helps them regain motivation, believe in themselves, and continue working toward a better future. Seeing students overcome challenges and make progress reminds me how important our school is to their success.

6. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

7. HCCTS is also important to me personally and professionally. Working at HCCTS is meaningful to me because I have the opportunity to make a positive difference in students' lives and help them achieve their goals. Knowing that my work supports students in building a better future gives me a strong sense of purpose and fulfillment. For my family, my position represents the value of education, hard work, and helping others.

8. HCCTS is part of the broader community it serves. HCCTS supports the local community by helping students improve their English, find employment, and become more independent. As students achieve their goals and contribute to the local workforce, they support their families and community. Their success stories also inspire others to continue their education and work toward a better future.

9. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at HCCTS would create financial hardship for my family and take away the opportunity to continue doing meaningful work that makes a positive difference in students' lives.

10. A closure would also harm the students and the broader community. Based on my experience, closing HCCTS would take away an important educational opportunity from students, some of whom may be getting their first chance to pursue an education. Many could lose confidence and motivation, making it harder for them to continue their education, find better jobs, and build a better future for themselves and their families.

11. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

12. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Khrystsina Talstyka

DECLARATION OF LAWRENCE STINSON IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, LAWRENCE STINSON, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been employed with the organization since 2018. Before that, I worked with special education students in an alternative education setting, and my wish to keep working in alternative education is what drew me to HCCTS. I believe that when adults take an active part in their own education, the benefits reach their families, their workplaces, and their communities.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. In my time at HCCTS, I have taught adults from all walks of life. Some were born and raised in this country and left high school early for one reason or another. Others immigrated to the United States as adults

and are learning English while they work toward their diploma. What they share is that they chose to enroll in school, often while working and raising children. Being in school lets them show their children that an education is within reach, and that sense of purpose pushes them, and their children, to strive for more.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have gotten to know students who left high school the first time, some after very difficult experiences in their lives, came to HCCTS, earned their diploma, gained new skills through career and technical education programs, and went on to work in respected fields. I have gotten to know students who immigrated to a new country and culture without speaking English, learned the language, earned their diploma, and went on to complete two-year and four-year college degrees. Many of our students are working to climb out of poverty so they can support their families on their own, without relying on government assistance. HCCTS gives them a real path to do that. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. HCCTS is where I have built my career and my life. Over these years I have grown as a teacher, as a leader, and as a person who understands what others are carrying. While working at HCCTS, I have earned two teaching credentials and two master's degrees in education. I have married and started a family, and this position is how I provide for them. During these same years, I have survived cancer twice. That fight taught me that when life knocks you down, you get back up, keep showing up, and take care of what needs to be taken care of. My students live that every day. Many of them are working and raising children while they finish school, some after years away, and they do not give up. When I tell them that adversity does not have to define them, they know I mean it, because I have lived it too. I understand resilience the same way my students do, and I believe that even when life is hard, we should always make every effort to be our best selves.

7. HCCTS is part of the broader community it serves. Our students are not just learning English and earning diplomas. They are building better lives for themselves and their families,

moving into steady jobs, and contributing to the local economy as workers and taxpayers. When an individual or parent earns a diploma, goes on to college, or starts a new career, the benefits reach their families and the community around them.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. My family depends on this position for our main household income and for our health insurance, which matters to me as a two-time cancer survivor. But the loss would not be mine alone. My students and I have built trust over time, and that trust is what makes them comfortable taking risks as they learn a new language and new content. If I had to leave in the middle of the year, my students would lose that support right when they need it most.

9. A closure would also harm the students and the broader community. Many of our students are working adults and parents who are balancing jobs and family in order to be in school. If HCCTS closed in the middle of the year, they would lose their progress in learning English, earning a diploma, and completing the career training that leads to better jobs, and I believe some of them would not be able to start over somewhere else. For students who are working their way out of poverty, that setback could keep them in the same situation they are working so hard to leave. Their children would lose the example of a parent finishing school, and the community would lose the workers and professionals that our graduates go on to become. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



LAWRENCE STINSON

DECLARATION OF Lyubov Chorney IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Lyubov Chorney, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been teaching at Highlands Community Charter School for two years and am now entering my third year. As an English learner myself, I came to this country with limited English proficiency and attended adult school to learn the language. Having experienced these challenges firsthand, I understand how difficult it can be to learn a new language while

adjusting to a new country and culture. This personal experience makes my work especially meaningful and rewarding. I feel fortunate to have the opportunity to make a positive difference in my students' lives by supporting them on their educational journeys, helping them build confidence, and empowering them to achieve their goals. In many ways, I see my own journey reflected in my students, which makes teaching adult English learners more than just a profession—it is something I am truly passionate about.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach students foundational skills in reading, writing, math, science, and social studies while helping them discover their individual learning styles and develop confidence in their abilities. I strive to create a positive, supportive, and collaborative learning environment where students feel valued, respected, and encouraged to succeed. In addition to academic instruction, I help students adapt to a new culture, understand social and educational expectations, and develop essential communication and life skills that will prepare them for success in school, the workplace, and their everyday lives.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. Through my firsthand experience at Highlands Community Charter School, I have witnessed the school's deep respect for cultural diversity and its commitment to creating an inclusive community where every student matters. We teach our students not only academic skills but also the importance of collaboration, listening to one another, respecting different perspectives, and learning from each other's experiences. Our school makes a meaningful contribution to the Sacramento community by providing adults with educational opportunities that can transform their

lives. Many of our students are learning to read and write for the first time, and witnessing their growth and accomplishments is incredibly rewarding. I am truly proud to be part of a school that values every individual, celebrates diversity, and empowers adult learners to build a brighter future for themselves and their families.

I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

HCCTS is also important to me personally and professionally. Teaching means so much to me because I truly enjoy helping others learn and grow while continuing to learn and develop professionally myself. This job is not only my passion but also an important source of stability for my family. As a single parent, my employment allows me to support my children and provide them with educational opportunities and a brighter future. Being part of HCCTS gives me the opportunity to make a meaningful difference in my students' lives while also building a better future for my own family.

HCCTS is part of the broader community it serves Many of our students graduate and successfully enter the workforce, pursue new career opportunities, or even start their own businesses. Through education, they gain the knowledge, skills, and confidence needed to become more independent, support their families, and make meaningful contributions to the Sacramento community.

If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. As a single parent raising two children on my own, I am solely responsible for supporting my family and meeting our financial obligations, including our monthly mortgage payments. Losing my job would place a significant financial burden on my family and create serious hardship, potentially

affecting our financial stability and my ability to provide a secure home and future for my children.

A closure would also harm the students and the broader community. Many of our students would lose access to essential educational opportunities if our school were to close. A significant number of our students live within walking distance of the campus and rely on its convenient location because they do not have reliable transportation to attend schools farther away. For many, our school is much more than a place to receive an education; it is their primary connection to the community outside their homes. It provides a safe, welcoming, and supportive environment where they can build friendships, develop confidence, connect with others, and feel a sense of belonging. Losing our school would mean losing not only access to education but also an important source of stability, connection, and hope in their daily lives.

I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Lyubov Chorney

DECLARATION OF Megan McMullan IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Megan McMullan, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students. I have been teaching English Language Arts at Highlands for five years. The work we do with disenfranchised and marginalized populations makes a huge, positive impact on people's life. It is rare, and extremely satisfying, to see the level of difference that education can have on people's lives

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. As an English teacher, I have facilitated and directly witnessed the growth that

can occur when adults learn to engage their higher order thinking skills and use them to understand and act upon their reality in order to change it.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen students go from homelessness to having professional careers in the medical field; from working in a convenience store to owning an auto body shop, from being excluded from the larger community because of the language barrier to navigating English speaking environments with ease. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Through Highlands, I was able to complete my adult education credentials and my single subject credentials in ELA with English Learner authorization. The professional development opportunities that Highlands provides are unparalleled in my experience. Even universities do not offer the same quality of professional growth opportunities.

7. HCCTS is part of the broader community it serves. Recently, some representatives from a local construction school came to my home to provide an estimate for building wheelchair ramp for my husband. They are offering to do this for free, with their students doing the labor in exchange for hours. We only need to buy the materials. I found out that this company was the same one that had partnered with Highlands for a long time, running it's construction CTE program. Its graduates are our students in many cases. This was a particularly poignant firsthand encounter with Highlands' community impact.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. My husband is newly disabled. I am the sole wage earner. We could lose our house. It would be disastrous

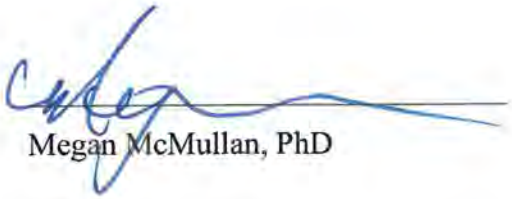
9. A closure would also harm the students and the broader community. Many of our students have been working diligently toward their high school diploma for years. To rip this out of their hands at this point would be unconscionable, especially knowing that their credits may not

directly transfer over to another school, assuming they could even find a school with open enrollment at this point in the year. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Megan McMullan, PhD

DECLARATION OF MOHAMMAD ASIF NAZIR IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Mohammad Asif , hereby declare as follows:

1. I am a Science Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been employed by HCCTS since June 2022. I began my work at the school as a para-educator in a multilevel classroom, supporting students with different educational and language-learning needs. I later worked as an English Language Development instructor and now teach science to adult learners. My experience in these roles has strengthened my commitment to education and to helping students overcome barriers to learning. I value the opportunity HCCTS has given me to grow professionally while making a positive difference in students' lives.

4. Teaching at HCCTS is different from teaching at a traditional K-12 school, because our students are adults who are working toward a high school diploma, learning English, or

developing career and technical skills while also managing jobs, families, and other responsibilities. In my current role as an elementary science teacher, I work with adult English learners who have a wide range of educational backgrounds and English proficiency levels. Some students especially those who hold pen for the first time need additional support with basic vocabulary, reading, and understanding classroom instructions, while others are ready to engage with more advanced material. I use visual aids, demonstrations, hands-on activities, repetition, simplified explanations, and differentiated assignments to make science accessible to students at different levels. I see how important it is to provide a supportive learning environment where adults feel comfortable asking questions, making mistakes, and continuing their education.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. HCCTS is helping students continue their education despite challenges that might otherwise prevent them from reaching their goals. Many adult learners must balance school with work, childcare, family obligations, and other responsibilities. Learning English and completing academic coursework can be difficult, particularly for students who have had no or interrupted educational experiences or who are still developing basic literacy skills. At HCCTS, I have the opportunity to help students build knowledge, develop confidence, strengthen their English skills, and continue working toward their educational goals. I believe these opportunities can make a lasting difference in students' lives by helping them become more independent and better prepared for future educational and employment opportunities. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Working at HCCTS has allowed me to develop my teaching skills, gain experience in different educational settings, got my preliminary teaching credential, and continue growing as an educator. I am grateful for the opportunity to use my background and knowledge to help students learn and progress. My position also provides important financial stability for my family. As a parent with children who depend on me, maintaining stable employment is essential to meeting our family's needs. Losing my position unexpectedly would create financial uncertainty and make it more difficult for me to support my

family. Beyond the financial impact, I would also lose the opportunity to continue serving students and contributing to a school community that has become an important part of my professional life.

7. HCCTS is part of the broader community it serves. It contributes by providing educational opportunities to adults who are working to improve their lives and the futures of their families. Through my work, I see students making the effort to learn English, strengthen their academic skills, and pursue their educational goals while managing many responsibilities outside the classroom. When adults have access to continued education, they have more opportunities to build skills, pursue further training, and work toward greater economic stability. I believe that supporting adult education benefits not only individual students but also their families and the broader community. HCCTS provides a learning environment in which students from different backgrounds can work toward these goals with the guidance and support of teachers.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. This would have a direct financial impact on my family by putting my employment and income at risk. Finding another teaching position may take time, and an unexpected interruption in employment would create additional stress and uncertainty for my family. It would also be personally difficult to leave my students without being able to continue supporting their learning and progress. I have invested time and effort in developing lessons, understanding students' needs, and creating a classroom environment that supports their learning. I want to continue that work and help my students achieve their goals.

9. A closure would also harm the students and the broader community. Adult learners often have to overcome significant barriers simply to attend class and continue their studies. They may have arranged work schedules, childcare, transportation, and other responsibilities around their school attendance. If HCCTS were to close, students could lose the consistency of their classes, relationships with their teachers, and access to the educational support they currently receive. Some students might be able to find other educational opportunities, but transferring to another program could involve delays, additional challenges, or a learning environment that does not provide the same combination of academic instruction and English language support. I am concerned that

students who have worked hard to return to school could lose momentum or face additional obstacles in completing their education. I believe it is important for HCCTS to remain open so students can continue their studies with as little disruption as possible. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Carmichael, California.



Nazir, Mohammad Asif

DECLARATION OF NATALIA LOWEY-BALL IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Natalia Lowey-Ball, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I support. I am a teacher of Social Science with the content area in ESL. My role as a teacher is to make history, geography, civics, and culture accessible to my English language learners while simultaneously building their English language proficiency. I have been working in this position at our school since August, 16 2022. Being a teacher since I was 22 years old and

being a second language learner of English myself have helped me develop skills that are necessary and unique to work here.

4. Working at HCCTS is different from working at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. In my classes, I teach students to understand our culture and history. Students learn to understand cultural concepts such as community, laws and rules, norms of behavior, etc. My experience shows that my students require deep guidance on navigating their new country, building successful lives, and securing decent employment.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have watched that our school made a crucial impact on many students who were able to improve their English, study at a high school level, and earn their high school diplomas. Our program also helped many students overcome language barriers and made them feel comfortable and confident in their new country. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Teaching at HCCTS is deeply meaningful to me because it allows me to directly empower students and foster growth within a supportive community. HCCTS brings family stability, balance in life, and security.

7. HCCTS is part of the broader community it serves. HCCTS provides for the low-income students to get tuition-free high school diplomas, provides English language instruction, and even assists in launching for employment. Such services include writing a resume, cover letters, and thank-you letters. HCCTS also directs Job Board Connections with local organizations.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. My husband is not working due to his illness and the upcoming surgery, so I am the only provider for our family. Losing my position puts my family in a financially and emotionally difficult situation.

9. A closure would also harm the students and the broader community. I believe that a closure of HCCTS would have a devastating impact on our students, staff, and broader Sacramento community. Our school provides vital support of our community and students who are adult learners. The closure of HCCTS would bring economic hardship on students' families. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 10th day of October, 2026, at Sacramento, California.

Lowey-Ball, Natalia

DECLARATION OF NATALIIA MAKSYMIV IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Nataliia Maksymiv, hereby declare as follows:

1. I am an ELD Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362 (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at Highlands since November 2021, first teaching adult English as a Second Language and later serving as an Independent Study Teacher. I came to this work because I believe adults deserve meaningful opportunities to continue their education, regardless of their background or the obstacles they have faced.

4. Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach ELD Newcommer program, Study Hall and Advisory. I meet with

students every day individually or during a synchronous class and help them understand assignments, develop language and academic skills, and make progress toward their educational goals. I have seen how difficult it can be for adult students to balance their studies with employment and family responsibilities.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have watched students build confidence in English and gain skills needed for employment and daily life. One former student, a Ukrainian refugee in her 50s, arrived in the United States with very limited English after being displaced by war. She worked hard in English classes and received support with résumé preparation and job interview practice. She later obtained employment at Walmart. Her experience illustrates how access to education and support can help a person rebuild independence. I describe this example based on my recollection and would verify the specific details before signing. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. As an immigrant and a former English learner myself, I understand how important language skills and educational opportunities are when building a life in a new country. Teaching at Highlands allows me to help students facing similar challenges. My position also provides income and stability for my family.

7. HCCTS is part of the broader community it serves. Through its adult education programs, Highlands helps community members improve their English, pursue diplomas, and prepare for employment. In my experience, these opportunities benefit not only students but also their families, as students become better able to communicate, navigate daily responsibilities, and participate in the local workforce.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position would create financial uncertainty for my household and interrupt the

work and relationships I have built with my students. I am also preparing for the birth of a child, which makes continued employment and stability especially important to my family.

9. A closure would also harm the students and the broader community. My students would lose established relationships with teachers and access to the learning routines and individualized support they currently rely on. Many are already balancing work, caregiving, language barriers, and other responsibilities. A sudden interruption could delay their progress toward diplomas, English proficiency, and employment goals. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.

Nataliia Maksymiv

DECLARATION OF NICOLE KAFAROVA IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Nicole Kafarova, hereby declare as follows:

1. I am a Art and Advisory Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. As an Art and Advisory Teacher, I provide academic instruction, monitor student progress, and help students overcome barriers to completing their education. I was drawn to this work because of my commitment to educational equity and expanding opportunities for underserved populations.

4. Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. Through my art and advisory classes, I work with students who are developing English language skills, returning to school after educational interruptions, and working toward their high school diplomas. My role extends beyond classroom instruction to providing individualized academic guidance, encouragement, and support.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have worked with students who face language barriers, limited educational backgrounds, and competing personal responsibilities. HCCTS provides these students with an opportunity to pursue their education without tuition costs while receiving individualized support. For many students, this represents a meaningful second chance to achieve their academic and professional goals. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. I understand the challenges of navigating an unfamiliar educational system as a former English Language Learner and immigrant. My experiences have shaped my commitment to ensuring that students, regardless of their backgrounds or circumstances, have equitable access to education. Working at HCCTS allows me to put these values into practice by supporting students who are often overlooked by traditional educational systems.

7. HCCTS is part of the broader community it serves. HCCTS contributes to the broader community by serving individuals who seek to improve their educational attainment, English language proficiency, and employment opportunities. By providing tuition-free

educational opportunities and student support services, the school helps remove financial and institutional barriers that can prevent individuals from pursuing their goals. These opportunities can benefit not only students but also their families and the communities in which they live.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Beyond the professional and financial uncertainty associated with losing my employment, I would be deeply concerned about the interruption of the relationships, academic support, and individualized guidance I have established with my students.

9. A closure would also harm the students and the broader community. Many of my students have already experienced interruptions in their education and are working hard to overcome significant barriers. Losing access to a familiar and supportive educational environment could delay their progress toward graduation, disrupt their academic goals, and discourage some from continuing their education. Students with limited English proficiency or significant personal responsibilities may face particular challenges transitioning to another program. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this12TH day of October, 2026, at Sacramento, California.

Nicole Kafarova

DECLARATION OF OLGA MUSTEATA IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Olga Musteata, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students teach. When I first came to the United States, I attended HCCTS as a student. Through the school, I learned about opportunities to work as a substitute teacher, which eventually led me to a position as a teacher's aide at a local public school. In 2022, I began working as a paraeducator, and in 2024, I transitioned into teaching. I now teach elementary mathematics to adult students at HCCTS. My journey has come full circle, and I am grateful for the opportunity to give back to the community that supported me when I was starting a new life in this country. I want to help my students build their skills, gain confidence, and discover new opportunities for their own futures.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach elementary mathematics to adult students. Every day, I see how much of a difference our school makes in their lives. Many of our students come to us with limited educational opportunities, but they are motivated to learn, build their confidence, and create better futures for themselves and their families.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen how this school helps students improve their English, develop career skills, and work toward earning their high school diplomas. Many students gain confidence, become more independent, and begin to see new opportunities for their futures. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Becoming a teacher helped my family financially. Becoming a teacher has helped my family become more financially independent, allowing us to support ourselves without relying on public assistance or free medical benefits. I am proud of how far we have come since arriving in the United States. It is especially meaningful to me that my daughter has followed in my footsteps and is now in her third year of university, pursuing a degree in education to become an elementary school teacher. My work at this school has not only changed my life but has also inspired my daughter to pursue a career in education.

7. HCCTS is part of the broader community it serves. Our school supports the local community by helping adults improve their education, learn English, and develop skills that can lead to better employment opportunities. By helping students overcome educational barriers and work toward their goals, the school contributes to building a stronger, more educated, and skilled community.

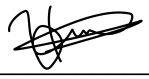
8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at this school would create financial hardship for my family and make it difficult to maintain the stability we have worked so hard to achieve. It would also be difficult to leave my students, knowing how important this school is to their education, confidence, and future opportunities.

9. A closure would also harm the students and the broader community. Many of our students already face significant barriers, and losing access to this supportive learning environment could delay their progress and discourage them from continuing their education. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 11th day of October, 2026, at Sacramento, California.



Olga Musteata

DECLARATION OF Olga Voznuk IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Olga Voznuk, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been working at Highlands Community Charter School since 2019 as a Multiple Subject Teacher. Throughout these years, I have had the opportunity to teach immigrant students from Afghanistan, Mexico, Ukraine, and Russia, as well as American students

who were seeking to earn their high school diplomas, improve their English language skills, and obtain certificates.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I have taught multiple subjects, including English, Mathematics, Science, Social Studies, and Citizenship. I have had the opportunity to work directly with HCCTS students in both online and in-person learning environments.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. My students are eager to learn and improve their skills, particularly in U.S. History, U.S. Government, and Economics. These subjects help students better understand American society, make informed economic decisions, understand their rights and responsibilities, and recognize the importance of following the law in everyday life.

6. In my teaching, I focus not only on academic growth but also on developing practical skills that students can apply in their daily lives. I strive to create a supportive learning environment where students feel encouraged to participate, build confidence, improve their English proficiency, and become more independent. It is rewarding to see students apply what they learn in the classroom to their families, workplaces, and communities. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

7. HCCTS is also important to me personally and professionally. I immigrated to the United States 30 years ago, and I have always dreamed of working in adult education to support immigrant communities. As an immigrant myself, I understand the challenges of adapting to a new country. I believe that teaching English and helping students understand American laws,

traditions, culture, and everyday life are essential to helping them become independent, successful, and active members of their communities. My position at HCCTS allows me to fulfill this personal and professional mission.

8. My job is also essential to my family's financial stability. I am currently the only working member of my household. My husband worked as a truck driver for 25 years, but health complications now prevent him from driving for long hours, and he is currently unable to work. We also have a 16-year-old daughter who is preparing for college. Keeping my position at HCCTS is vital to supporting my family and continuing the meaningful work I am passionate about.

8. HCCTS is part of the broader community it serves. HCCTS supports the local community by partnering with World Relief to provide valuable services to immigrant students and their families. Through this partnership, students can access legal consultations, receive assistance with completing important documents, and obtain translation support. These services help immigrant families navigate unfamiliar systems, overcome language barriers, and access resources that support their successful integration into the community. This partnership demonstrates HCCTS's commitment to meeting students' needs beyond the classroom.

9. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year.

10. A closure would also harm the students and the broader community. Losing my position at HCCTS would have a devastating impact on my family's financial stability. I am currently the only working member of my household, and my income is essential to paying our mortgage, monthly bills, utilities, groceries, and other basic living expenses. My husband is currently unable to work due to health complications after working as a truck driver for 25 years.

We also have a 16-year-old daughter who is preparing for college, and I want to be able to support her education and future. Without my job, my family would face significant financial hardship and uncertainty. Keeping my position is essential to maintaining our home, meeting our daily needs, and providing my daughter with the opportunity to pursue a college education.

11. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption. The closure of HCCTS would have a significant impact on our students and the community. Our school has become an important part of students' daily routines, providing education in English, math, social studies, and science. Students also develop digital skills through daily computer use, receive interpretation support, and gain confidence in navigating everyday life. Our goal is to help students earn their high school diplomas, develop skills for employment, and build better futures for themselves and their families. At HCCTS, we teach our immigrant students the importance of following American laws and fulfilling their responsibilities, such as sending their children to school regularly, obeying traffic laws, and paying taxes. We also encourage students to seek employment, become self-sufficient, and contribute positively to their communities. Losing HCCTS would mean losing an educational program and a supportive community that helps students achieve these goals.

12. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Olga Voznuk

DECLARATION OF Pada Moua IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Pada Moua, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. This year, I am a CICA Newcomer teacher where I teach ELD, Study Hall, and advisory for newcomer students who are interested in learning English and/or would like to earn a high school diploma. I started in 2022 as a seat-based HCCTS teacher, and my life has been completely changed for the better due to my experiences with my students and colleagues. I started working at Highlands after my Master's program, and something that was supposed to be a temporary stepping stone ended up blossoming into a lifelong passion that I am fully devoted to.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or

developing career and technical skills while also managing jobs, families, and other responsibilities. In my position, I get to work very closely with the students, and I get to teach them not only academic reading and writing but also effective communication skills for life and everyday tasks. I have always been a believer and supporter in education at all levels, but our students bring a whole new meaning to perseverance and personal achievement. Almost all of our students come from challenging pasts whether it's fleeing from war-torn and dangerous countries to struggling with mental disabilities and homelessness, our students come to class every day not because they have to, but because they want to. Our students motivate and invigorate me even on the toughest days, and I show up for my students because they show up for themselves every day.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have witnessed many students start our program as early beginners who struggle with illiteracy even in their own native languages to becoming high-achieving academics who are eager to give back to their community. Just last year, I had a student join my class who had a 7th grade level education in her country, and by the end of the year, she was able to create and present a research project, complete summative reading and writing projects, and pass academic reading and writing tests. At the same time last year, I had a U.S.-native student who couldn't finish high school due to a learning disability, but he joined our school last year and developed confidence and independence as he attended each day. This student states that if it weren't for the flexibility and empathy of our school, he would never be able to finish his diploma anywhere else due to the high-stakes demand and fast-paced nature of other adult schools that may not accommodate marginalized adults. The amazing thing is that these are just two out of the hundreds of unique students that I have encountered and will encounter throughout my time with Highlands. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Teaching here has given me a purpose, and I take deep pride in the work and relationships I have built here. I perk up at any opportunity to talk about my school and my students, and being a teacher here gives me

something to look forward to every day. This school is so deeply woven into who I am as a professional and a person, and I believe whole-heartedly in our mission and value the opportunity to help adult learners build their confidence, continue their education, and work toward a better future for themselves and their families. I believe in second chances at any age, and being in this position allows me to help students pursue goals that they may once have felt were out of reach.

7. HCCTS is part of the broader community it serves. I have seen how HCCTS supports the local community through career preparation and access to education. Our Career Technical Education (CTE) program actively helps students search for jobs, complete applications, and prepare for interviews. Through this program, students also gain relevant skills and certifications that assist in finding better jobs for students. This support helps students pursue employment opportunities and work toward greater financial stability for themselves and their families.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position would create a significant financial uncertainty for my household. I rely on my income to meet ongoing obligations, including my mortgage, utilities, transportation, and other living expenses. Not only that, but I am currently in the process of clearing my teaching credential through the SCOE Teacher Induction program. A midyear closure would disrupt the teaching position in which I am completing my induction work and could delay my progress toward earning a clear credential.

9. A closure would also harm the students and the broader community. As an adult ELD teacher, I understand the courage it takes for students to return to school while balancing work, parenting, and other responsibilities. Relationships and trust are essential to supporting their persistence. A sudden closure would interrupt their instruction and separate them from teachers who understand their needs, recognize their progress, and encourage them through challenges. Many of the immigrant students I serve have already had to rebuild their lives and adjust to unfamiliar languages, institutions, and expectations. Closing HCCTS would force them to start over again, creating another barrier as they word towards their goals. I am concerned that the

difficulty of finding another program, building new relationships, and adjusting to different requirements would lead some students to delay or stop pursing education. The effects would also extend to students' families. The parents I serve have children attending schools in districts throughout the Sacramento area. Improving their English helps these parents communicate with their children's teachers, understand school information, and support their children's learning. Losing access to this education could affect both their children and the school communities those children belong to. HCCTS provides free education, flexible learning options, and personal support that make continuing their education possible. For students facing these barriers, the school is a vital pathway toward greater independence and a better future. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Pada Moua

DECLARATION OF Parisa Samadi IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Parisa Samadi, hereby declare as follows:

1. I am an ELA Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach and support. I have been working at highland for almost 4 years. I came to highlands to serve students who need more support because I have gone through the experiences of learning language and I want to share my own process with them and help them to succeed in their life here. Teaching at HCCTS is different from teaching at a traditional school, because our

students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I teach ELA at PM high school level. In my experience, HCCTS plays an important role in the lives of the students it serves. Everyday when I teach I can see how I have impacted the life of many students. The students who were not confident in their English and could not express their ideas, now stand up in class and share their own experiences. They can write and communicate with others more comfortably. They are looking to continue their education in college, something that they did not think about before coming here. They are thinking about their dream jobs and improving the quality of their lives. They are very busy in the morning, but they come to school at night to achieve what they have been waiting for for years. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

4. HCCTS is also important to me personally and professionally. Teaching in this group of students is challenging since the level of their English is varied and I have to differentiate my lessons, but I like this challenge because it fortifies my teaching skills. Everyday, I learn how I can teach a lesson in different ways. When I check them for understanding, I learn what is successful and what is not. I have to look for different resources and I believe working with this population and all teachers who want to help this group of students has made my teaching more efficent. HCCTS is part of the broader community it serves. When my students have enough confidence, they can find a better job and they are not dependent on others. I have seen many of my students who are helping their kids in their studies, go to their Dr. appointments by themselves, make their other appointments, confidently answer the phone, and they are successful in college that I believe it is something that Highlands has supported them with.

5. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. They cannot finish what they have started. They are like my family and we are a community together. I know their family and they know mine. Highlands is a very nourishing community for all of us.

6. A closure would also harm the students and the broader community. The students might lose their motivation and they might not find this kind of palace to come and talk, share their ideas and learn from each other. I have some students who are about to graduate and closing school really hurts them. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

7. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Parisa Samadi

DECLARATION OF Russell Patty II IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Russell Patty II, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. As an ELA teacher currently in induction, HCCTS has been important as I develop my skills as a teacher, but even more importantly, it has allowed me to serve and support my community. In my four years with Highlands, I have grown as an educator and as a person. I have taught so many amazing individuals from diverse backgrounds who teach me about life just as much as I teach them about English. I have seen the real need for the education HCCTS offers and have seen how it changes students' lives for the better. In class, students build community, make lasting friendships, and create a safe, supportive space. I have seen the immediate benefits in my students' lives as they gain confidence, increase civic participation, get promotions, find new

jobs, and even graduate from college. The community HCCTS serves needs support to create educational equity. Honestly, HCCTS cannot solve this problem alone, but without it, the community would face a major setback. The community would be at a great deficit instead of moving in the right direction towards a strong and equitable community.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. For many of our students, this is the first time they have been allowed a formal education. For other students, this helps give them the skills to be successful and productive community members in the United States. By supporting these students, HCCTS helps improve the lives of the students, their families, and the community around them.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. Opening this opportunity for students to obtain a high school diploma provides students with the opportunity needed to be the first in their family to go to college, pursue opportunities that were not open to them in their home countries, and allow students who left everything behind to start again and work towards the dream they left for. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. HCCTS has allowed me to advance my career as an educator. I have earned two credentials and am finishing my master's in education. It has also allowed me to support several family members with lifelong struggles. It has inspired me to give back to my community, and starting in January, I will work with local bookstores and libraries to donate my time and host open book clubs to support learning outside the classroom and address falling literacy rates.

7. HCCTS is part of the broader community it serves. With every individual Highlands supports, they gain the knowledge and strength they need to be a pillar in the community. With every individual who rises up, that is one less person who needs support and one

more who provides it. They truly strengthen the community, and all they need is the tools to help support their start. This helps eliminate cycles of inequity and systemic oppression that plague these communities. With every student who rises up, they inspire two more.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Finding another full-time teaching position at this time of year would be difficult, if not impossible. It would cause my family and me significant hardship. I would temporarily lose my ability to provide for my family and myself as I scramble to find a job that could support them and cover medical problems I face.

9. A closure would also harm the students and the broader community. HCCTS closing would be a step in the wrong direction. It would help perpetuate cycles of oppression and systemic issues that harm our communities. HCCTS is not perfect by any means, but we keep getting better. I have seen the real good HCCTS has done, even at its low points, and with a little momentum and improvement, I think what we can accomplish will far outshine any success we have had in the past. I know this because, year after year, I see our students improve, and year after year I become a better teacher. Year after year, HCCTS has helped thousands of students imagine what kind of future we could have. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Russell Patty II

DECLARATION OF RYAN LUTGEN IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Ryan Lutgen, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have just celebrated my ninth anniversary of working at Highlands as a teacher and it is hard to imagine another place I could teach where my work would feel so meaningful and rewarding.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. Before coming to Highlands in 2017, I worked mostly with international university students, which was interesting and rewarding in its own way. However, I feel that my work here is much more important and makes a positive impact on society because we are working with vulnerable individuals who are here living in our community and need to develop their English language proficiency in order to find meaningful employment and contribute to their new home.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. These adult students are from among the most vulnerable populations living in this state. My students fled war, poverty, and oppression to build a new life in a country where they could have opportunities that were previously out of reach. A large percentage of our student body is from Afghanistan, where women and girls are currently barred from attending school by the ruling Taliban regime. They often express sincere gratitude for being able to pursue their education here, as well as for the sense of community and other resources Highlands provides. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Along with the sense of pride and fulfillment I find in what I do, working here has provided me with well-paid full-time employment in a field that too often leaves teachers struggling to make ends meet. I am grateful to not have to piece together multiple part-time gigs or drive long distances from one community college to another.

7. HCCTS is part of the broader community it serves. I am proud to have had many former students go on to become HCCTS employees, though sadly many have been laid off with last year's downsizing and restructuring. We have built strong partnerships in the community and connected students with job opportunities and community colleges and training programs to continue building their post-graduation lives.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. I would find myself unsure what to do next, financially insecure, and would feel a profound sense of loss of the community that we have built at HCCTS.

9. A closure would also harm the students and the broader community. One of the things I admire most about our school is that it creates generational change and has the potential to end cycles of poverty and suffering. Most of our students are parents, often with large families. We give them the tools to become literate in English and to understand more about life in the United States so they can in turn help their children with their homework and be more active and aware participants in their children's education. If we close our doors to the most vulnerable, many will have nowhere to turn and this will have negative consequences for entire communities that will reverberate for generations to come. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Ryan C. Lutgen

DECLARATION OF Salvador Cruz-Alvarez IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Salvador Cruz-Alvarez , hereby declare as follows:

1. I am a ESL Literacy Specialist currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach and support. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach and support. I have worked with HCCTS since November 2021, serving in several roles, including Paraeducator, ELD/IHS Teacher, Teacher on Special Assignment, EL Civics Coordinator, and currently ESL Literacy Specialist. Throughout

my time at HCCTS, I have had the opportunity to work directly with adult learners as well as support teachers, administrators, and instructional programs. I was drawn to HCCTS because of its focus on providing educational opportunities and support to adult students, including students who are balancing work, family, and other responsibilities while pursuing their educational and career goals.

4. Working at HCCTS is different from working at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. In my current role as an ESL Literacy Specialist, I provide literacy-focused ESL instruction to adult English language learners, particularly students at beginning proficiency levels. I assess students' English language and literacy skills, develop lessons aligned with program objectives, differentiate instruction based on students' educational backgrounds and learning needs, and provide individual and small-group support. In my previous roles at HCCTS, I also taught adult English learners in reading, writing, listening, and speaking and supported the development and implementation of EL Civics assessments. My direct experience working with HCCTS students has shown me the importance of providing instruction that is accessible, supportive, and responsive to the needs of adult learners.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. In my experience, HCCTS plays an important role in the lives of the students it serves. I have personally seen adult students make progress in their English language and literacy skills, build confidence in communicating with others, and become better prepared to pursue educational, employment, and career goals. Many of the students I have worked with are balancing school with work, family responsibilities, and other challenges. HCCTS provides them with an opportunity to continue their education while receiving individualized support from teachers and staff. I have

seen students who initially struggle with English or literacy develop greater confidence and independence as they progress through their education. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. HCCTS is important to me personally and professionally because it has allowed me to build my career in adult education while making a direct difference in the lives of students. During my time at HCCTS, I have grown from a Paraeducator into teaching, instructional leadership, EL Civics coordination, and my current role as an ESL Literacy Specialist. The position has provided me with meaningful professional growth and the opportunity to use my skills to support adult learners and my colleagues. My employment at HCCTS also provides important financial stability for my household and allows me to continue building my career in a field that I value.

7. HCCTS is part of the broader community it serves. HCCTS contributes to the local community by providing educational opportunities to adults who may otherwise face significant barriers to continuing their education. Through my work with adult English learners and EL Civics, I have seen how the school helps students develop English language skills, access information and resources, prepare for employment and career opportunities, and become more confident participating in their communities. HCCTS also brings together teachers, support staff, administrators, and community partners to provide students with educational and career-related support.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. If HCCTS were forced to close or stop operating, I would lose my position and the ability to

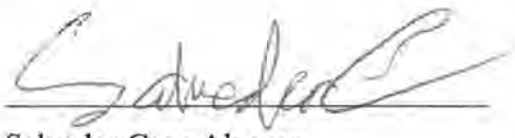
continue working with the students I currently serve. Losing my position in the middle of the school year would create significant financial and professional uncertainty for me and my household. I would also lose the opportunity to continue working in adult education and supporting students with whom I have developed professional relationships over several years. Finding comparable employment immediately would not necessarily be possible, particularly in the middle of the school year, and a sudden loss of employment would disrupt the stability that my current position provides.

9. A closure would also harm the students and the broader community. A closure would also harm the students and the broader community. Based on my experience working directly with HCCTS students, many adult learners depend on the flexibility, support, and educational opportunities provided by the school. Students who are working, raising families, learning English, or pursuing career goals could face significant disruption if they were suddenly required to find another educational program. A closure could interrupt students' progress, delay their educational and career goals, and make it more difficult for some students to find a program that meets their specific needs. I believe the loss of HCCTS would have a significant impact on the adult learners and families who rely on the school for accessible education and support. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

[*Remainder of Page Intentionally Left Blank*]

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Salvador Cruz-Alvarez

DECLARATION OF Sky Fuller IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Sky Fuller, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have worked at Highlands Community Charter and Technical Schools (HCCTS) for six and a half years, primarily as an educator serving adult learners from diverse educational, linguistic, and cultural backgrounds. I was drawn to HCCTS because of its mission to serve underserved populations and provide equitable access to education. This mission is deeply

personal to me, as neither of my parents graduated from high school. I understand how limited educational opportunities can affect not only individuals but also future generations. I believe education has the power to change the trajectory of families, and I am passionate about helping our students access opportunities that can lead to lasting generational change.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. During my six and a half years at HCCTS, I have primarily taught English Language Development (ELD) and Social Science to adult learners. My students come from diverse linguistic, cultural, and educational backgrounds, including immigrants and refugees, many of whom have experienced interrupted or limited formal education. I help students develop the language, literacy, and academic skills necessary to pursue their educational goals. Through Social Science instruction, I also help students understand American history, government, civic rights and responsibilities, and the democratic processes that shape their communities. This knowledge empowers students to become more informed and engaged members of society, advocate for themselves and their families, and prepare for the U.S. citizenship examination. For many of my students, this education provides not only a pathway toward a high school diploma but also the knowledge and confidence to participate more fully in their communities.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have witnessed students make meaningful progress in their English language proficiency, academic skills, and confidence. Many of my students balance their education with employment, childcare, and other family responsibilities. Some arrive with very limited literacy skills or little experience in a formal classroom. Over time, I have seen students become more confident communicating in English, navigating everyday situations, and participating in their education.

For many, earning a high school diploma represents an opportunity to pursue better employment, further education, and greater economic stability for their families. HCCTS provides a pathway for adults who might otherwise have few opportunities to continue their education. I have also helped dozens of students prepare for and pass their citizenship exams. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Teaching at HCCTS has been one of the most meaningful experiences of my career. I entered education as a second career because I wanted to make a difference in people's lives. During my six and a half years at HCCTS, I have witnessed hundreds of students walk across the stage to receive their high school diplomas. I have also seen the extraordinary commitment of students who spend entire days at school while balancing employment and family responsibilities. These experiences have reinforced my belief in the importance of our school's mission and motivated me to pursue a master's degree in education to further develop my skills as a teacher.

7. My decision to invest in my education was based in part on my confidence that HCCTS would continue operating. I personally attended all of the Twin Rivers Unified School District board meetings concerning the school's future and heard board members state that their votes were not intended to close the school, but to give Highlands and CICA additional time to address the identified issues. Based on those statements, my firsthand experience with the school's impact on students, and my understanding that efforts were underway to resolve the outstanding disputes, I believed the school would have an opportunity to continue serving its students. Had I understood that closure was a more immediate possibility, I might have made different decisions about the time and financial resources I committed to furthering my education.

8. HCCTS is part of the broader community it serves. The impact of HCCTS extends beyond the classroom. Many of our students are parents of children attending local schools. By helping parents develop stronger English language, literacy, and academic skills, we empower them to communicate with their children's teachers, support their education, access community resources, and pursue opportunities that can provide a better future for their families. Without these skills, children are often placed in the position of serving as their family's primary translators, sometimes navigating complex or sensitive situations involving medical diagnoses, financial matters, or other adult responsibilities. This can place an emotional burden on children and take time and attention away from their own education and development. By educating parents, HCCTS helps reduce these barriers, strengthens families, and supports the success of the next generation. I believe this is one of the most meaningful ways our school contributes to the broader community.

9. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with my students in the middle of the school year. The financial consequences would be significant for me and my family. I have three children and also provide financial assistance to both of my parents, who struggle to make ends meet. I have made substantial investments in my professional education with the expectation that I would be able to continue my teaching career at HCCTS. An unexpected loss of income would place considerable strain on my ability to meet my own financial obligations while continuing to support my family. Finding another teaching position in the middle of the academic year could be particularly challenging, leaving me facing an uncertain period of unemployment. Beyond the financial hardship, I would be devastated to leave my students and the work to which I have dedicated the past six and a half years.

10. A closure would also harm the students and the broader community. I believe the closure of HCCTS would have serious consequences for the students and communities we serve. Many of my students have already overcome significant barriers simply to return to school. For adults balancing employment, family responsibilities, language barriers, and limited financial resources, finding another accessible educational program may be difficult. A sudden closure could interrupt their progress toward graduation, disrupt the relationships and support systems they have established, and discourage some from continuing their education altogether. For students who have experienced interrupted schooling or limited access to education, another disruption could be particularly damaging. I am concerned that many of the students we serve would lose an educational opportunity that is difficult to replace. The local community colleges are also impacted and, based on my discussions with colleagues who work at these institutions and my review of their program requirements, many programs require a minimum English proficiency level of Beginning High. Many of our students are below that level, including students with very limited literacy skills who may not qualify for these programs. I am not aware of another nearby school that could immediately accommodate HCCTS students at all proficiency levels and allow them to continue their education without significant delay or disruption.

11. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

[*Remainder of Page Intentionally Left Blank*]

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Sky Fuller

DECLARATION OF Stacey Williams IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Stacey Williams hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been a teacher at HCCTS since 2020. I was drawn to teach at HCCTS by its mission of teaching underserved adults. I have spent my entire 40 career teaching ESL to adults who want to change their lives in the United States for the better.

4. Teaching at HCCTS is different from t at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. For the adult learners I serve, the value of Highlands reaches far beyond the classroom: **English creates independence.** Students gain confidence to do more than just exist within their new lives. They

learn to speak with doctors, communicate with their children's teachers, and handle everyday situations. **Education opens doors.** A high school diploma, stronger literacy and math skills, and career training can make further education and better employment possible. Many students have never had the opportunity to go to school and this first chance at education means they have the opportunity to learn things they never thought possible. **Community creates belonging.** Immigrants, refugees, and adults returning to school find people who know them, encourage them, recognize their strengths and perhaps most importantly, give them a safe place to begin a new life. **Support makes persistence possible.** Flexible learning options and caring staff help students continue the education while managing work, childcare, and other responsibilities. **Learning benefits whole families.** When adults become more confident learners, they can support their children's education and model perseverance. Generational change begins with parents first. **The future depends on education.** An educated electorate can make better decisions about their health, their children's lives, and the future of more than just their household; they hold the future of the United States in their hands.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. Students in my classes have gone on to get professional jobs as engineers, computer technicians, and customer service representatives. Many students have come back to tell me how their time at HCCTS was invaluable to their current lives. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. My own life has been enriched by knowing the students that I work with. Many of the stories of hardship are unbelievably tragic and yet, the students show up to school everyday and depend on my teaching and my kindness to build new lives. It is a deeply humbling experience to work with the students who attend HCCTS and one that my friends and family cannot believe is possible.

7. HCCTS is part of the broader community it serves. One small but potentially huge community service that HCCTS has provided is the teaching of CPR and other life saving technics

to the entire student body at no cost to them. The impact that this could, and has already had, on one individual life is immeasurable.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. This would leave me feeling very empty and as if I have failed my students. I have been a teacher for a very long time and would hate to end my career on such a miserable note.

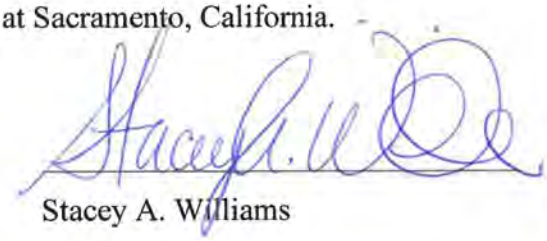
9. A closure would also harm the students and the broader community. The closure of HCCTS could mean much more than losing a place to take classes. For my adult students, it could interrupt their education or for many students end their access to education, weaken their support network, and make goals they have worked hard toward feel harder to reach.

10. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

11. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Stacey A. Williams

DECLARATION OF STEFANIA SIDERI IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Stefania Sideri hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I teach mathematics at HCCTS, and I chose to work here because I was once an international student myself. When I moved from Greece to pursue my master's degrees, I experienced firsthand the challenges of adjusting to a new environment. This experience helped me understand how important it is to support students from diverse backgrounds, as well as adults who are rebuilding their lives regardless of the obstacles they have faced in life. Working at HCCTS allows me to help students overcome challenges, build confidence, and work toward a better future for themselves and their families.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. As a math teacher, my role is not just to teach mathematics but also to support students in their lives beyond the classroom. I work to make lessons meaningful and accessible while providing individual support to help students build confidence in their abilities. My experience with HCCTS students has shown me how tremendously hardworking and determined they are. Despite the many responsibilities and obstacles, they face in their daily lives, they continue to show up, learn, and work hard to achieve their educational goals.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen students face and overcome significant life challenges, such as losing a job, struggling to provide for their families, and having difficulty communicating in English in their daily lives. HCCTS does more than help students earn their high school diplomas; it also provides support and resources to help them get back on their feet and move forward. Students can receive guidance with building a resume, searching for jobs, digital tutoring and finding resources for essential needs such as childcare and food assistance. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally because I believe education can change lives, regardless of a person's background or the challenges they have faced. I have taught at a traditional high school in the past, but being part of HCCTS has shown me how much more I can contribute to education and has brought so much more meaning and purpose to my life. As a mathematics teacher, I have the opportunity not only to help students learn math but also to support them through life's challenges, encourage them when they feel discouraged, and remind them that it is never too late to work toward their goals. I am proud to share the work I do with my family because I know that my role at HCCTS goes beyond teaching a subject. I am part

of a community that gives people hope, creates opportunities, and helps students build better futures for themselves and their families.

7. HCCTS is part of the broader community it serves because it provides more than a pathway to earning a high school diploma. It also offers English-language development, career and technical education (CTE) programs, industry-aligned workforce training, and digital tools that help adults prepare for employment. Many adults in our community face challenges that make continuing their education difficult, including balancing work, parenting, transportation, housing instability, health needs, and other family responsibilities. HCCTS recognizes these realities by providing flexibility, individualized academic support, workforce preparation, and resources that help students navigate obstacles in their daily lives.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. The impact on me would be both professionally and personally devastating. I have built meaningful relationships with my students and worked closely with them to create plans for their futures. I have weekly check-ins with them to make sure they are making progress, staying on track, and working toward their goals. It would be heartbreaking to see these relationships and plans suddenly interrupted, leaving students without any support and guidance. I worry that some students might feel alone, lose motivation, or give up on the progress they have worked so hard to achieve. Losing my position would also mean losing not only my job and my ability to provide for my family, but also work that gives me a strong sense of purpose and fulfillment. Knowing that the relationships I have built, the plans I have made with students, and the efforts I have put into supporting their futures could be interrupted would be emotionally difficult. HCCTS is much more than a workplace to me; it is a community I care deeply about.

9. A closure would also harm the students and the broader community. Many of our students have already faced setbacks in life, and HCCTS has given them another opportunity to work toward a better future. Closing the school would not only interrupt their education but also disrupt the meaningful relationships they have built with their teachers and take away an important source of support, guidance, and encouragement. I am not aware of another school nearby that

could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 12th day of October, 2026, at Sacramento, California.



Stefania Sideri

DECLARATION OF Stephen Fowler IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Stephen Fowler, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I am an Independent Study teacher that teaches English Language Development, and Social Science and English Language Arts

Teaching at HCCTS is different from Teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I am writing to ask you to pause the upcoming state board hearing about Highlands. I am a teacher here, and I see how much our students need this school. Highlands is a safe place and a lifeline for nearly 2,000 students.

If you close Highlands now, these families will lose their only chance to learn English, get a U.S. high school diploma, and build a better life.

4. In my experience, HCCTS plays an important role in the lives of the students it serves. Every morning, I log on to teach online classes to over 60 students, including many women who fled the wars in Ukraine and Afghanistan. Many arrived never having held a pencil or spelled their own names. Now, I get chills watching them smile with confidence as they read simple English sentences and learn how our society works. Our school serves adults who never finished high school and parents who work long hours. No other local program offers the flexible hours and family support that we do. For people living on the edge, Highlands is the bridge from survival to independence.

5. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. I fully have given my heart and ability to serve these students. It is a personal mission and I was hoping to begin our teaching into the underserved and those needing second chances incarcerated in the jail system in our area.

HCCTS is part of the broader community it serves. Again I repeat, no other local program offers the flexible hours and family support that we do. For people living on the edge, Highlands is the bridge from survival to independence.

7. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. I would have to go on unemployment after working for 29 years as a teacher in the community. I am the main money earner in our family and this would negatively impact our home. A closure would also harm the students and the broader community. Further, I'd liked to states that Highland's compliance track record strongly supports keeping our doors open. In early 2026, the Twin Rivers

Unified School District staff formally recommended against revocation. Furthermore, in May 2026, the Sacramento County Office of Education heard our appeal and overturned the revocation because it found that Highlands fully implemented all required revisions in compliance with California law. Most recently, the State Auditor confirmed that we have fully implemented all 18 items directed at our school.

Under a new leadership team led by Jonathan Raymond, we have made deep, real changes. Every class is taught by a certified teacher, attendance is tracked carefully every period, and strong financial controls protect our budget. Closing the school now would be like turning off the oxygen while a patient is in surgery. We just need time for these changes to work. Please pause the hearing so we can keep serving these families and moving forward together.

Thank you for your time and for considering our students.

8. I am not aware of another school nearby that could immediately take in HCCTS students, and allow them to continue their education in the same way, without significant delay or disruption.

9. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Stephen Fowler

DECLARATION OF SVETLANA BRUNNER IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Svetlana Brunner, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I have been working at Highlands as an English Teacher since early 2022. I joined this school because I value its educational mission and am committed to supporting students' academic growth and success.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. In my role as an English teacher, I work directly with adult students from diverse cultural and linguistic backgrounds helping them develop English language proficiency, and work towards earning their high school diploma.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have seen students arrive at HCCTS with little or no English, develop language skills, gain professional training, and go on to secure jobs or start their own businesses, becoming independent, contributing members of the community who pay taxes. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. It provides purpose, stability, and opportunities for growth for my family and me. Beyond my work, I have found true friends and become part of a professional community of knowledgeable, dedicated, and motivated teachers and staff who inspire and support one another.

7. HCCTS is part of the broader community it serves. HCCTS actively supports the local community, including helping a Black-owned local café recover after storm damage some years ago, so it could reopen and continue serving the community.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at HCCTS would mean much more than losing an income for my family. It would mean losing meaningful, rewarding work, hopes, true friendships, and a professional

community that has become an important part of my life. It would also shake my belief in the promise of this country, where education and hard work should open doors to a better future. HCCTS gives me the opportunity to make a real difference in students' lives, and I would deeply miss being part of that mission.

9. A closure would also harm the students and the broader community. Many of our students have nowhere else to go. Colleges often cannot accommodate low level English learners, especially those facing transportation barriers, while adult schools lack sufficient seats to serve everyone who needs an opportunity. At HCCTS, we know our students and their families personally, understand their individual needs, and provide the support they need to succeed. I have witnessed students arrive with little or no English and gradually gain language skills, professional training, confidence, and hope for a better future. If Highlands closes, many may lose their last real chance to learn English, find employment, support their families, and become fully participating members of society. For me, as an educator and an American citizen, it is deeply painful to imagine losing the opportunity to help students who are working so hard to build better lives for themselves, their families, and for our country. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

SVETLANA BRUNNER

DECLARATION OF TOM PEARSON IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, **TOM PEARSON**, hereby declare as follows:

1. I am a teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I work with English as a Second Language students at HCCTS, and I've served in a variety of teaching, mentoring, and administrative positions over the past 10 years here.

4. Teaching at HCCTS is different from working at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. At the moment, I work with our lowest-level English learners, meaning these are students who have only a very basic understanding of the language. Over 95% of my students are women from Afghanistan, and most of them were unable to attend much, if any, school in their birth country. But now, they bring tremendous enthusiasm and motivation to the classroom and are excited about the opportunity to get hands-on practice and direction in their new language.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have watched dozens and dozens of my former students move to higher levels of English, obtain CTE trainings and certificates, and proceed beyond graduation to gain employment. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Working with adult language learners has been my career and passion for the last 20 years. I have had teaching roles elsewhere that enabled me to use my expertise and passion, but none where I saw so much direct impact on the communities we serve.

7. HCCTS is part of the broader community it serves. We have long connected students with other resources and been a touchpoint for students in crisis or trauma. Teachers and staff go beyond their job descriptions to help students find solutions to myriad problems and obstacles.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school

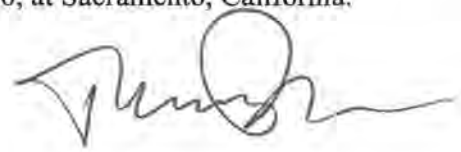
year. I love working with our vulnerable immigrant population, and it would be very difficult to find a comparable job on short notice.

9. A closure would also harm the students and the broader community. There are options that do some of the things HCCTS does, but none that serve such a broad variety and range of students, nor as flexibly and professionally. Community colleges and adult schools in the area are trying to pick up some of the slack, but they do not have the staff, the resources, or the reach to offer the range of classes and programs, and many of the programs we offer are not in their mandate. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2026, at Sacramento, California.



Tom Pearson

DECLARATION OF Uriel Medina IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Uriel Medina, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's *Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362* (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I am a Social Science Teacher at Highlands, where I teach U.S. Government/Economics and World History. I have worked here for 7 years. What interested me about Highlands was the opportunity to work with adult students who are trying to learn English and finish their high school diploma while also dealing with everyday responsibilities. In a lot of

ways, I resembled my mother who tried many times to learn English and finish her high school diploma even though she had other obligations. I liked the idea of working with adults who were coming back to finish their education, especially those who had been out of school for years. Since working here, I've come to appreciate how much it means to students to have another opportunity to earn their diploma.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or developing career and technical skills while also managing jobs, families, and other responsibilities. I work with students from different backgrounds and learning levels. Many of my students need extra support, especially those who are still learning English. I help by breaking down difficult topics, and using real-life examples. For some students, this is the only opportunity they get to practice English and learn about how the government works in this country. I use this time to support them and make sure they know their rights and where they can go in the future.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I've seen students who struggled with school in the past make progress toward earning their diplomas at Highlands. Some students start off unsure of themselves, but over time they become more confident and independent. Many are also improving their English while working toward their diplomas. I think Highlands gives students a chance to accomplish something they may have thought was no longer possible. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Working at Highlands means a lot to me because I get to help students who are trying to improve their lives through education. It's rewarding to see their progress and know that I've played a small part in

helping them reach their goals. This job also provides stability for me and my family, and losing it would create financial uncertainty. Highlands has given me the opportunity to grow as a teacher while doing work that I genuinely enjoy.

7. HCCTS is part of the broader community it serves. Highlands helps the community by providing resources to many students through partnerships with La Familia for example. I have had many students seek resources such as immigration, housing support and Highlands has been able to point those students to the corresponding support they need.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position at Highlands would put me in a difficult financial situation. I am currently the sole provider for my family as my wife returned to school and stays home to care for my child. We depend on my income to pay our mortgage, bills and everyday expenses. Finding another teaching position in the middle of the school year would be challenging, and losing my job would create a lot of financial stress and uncertainty for us.

9. A closure would also harm the students and the broader community. Closing Highlands would take away an important opportunity for many of our students. They have worked hard to overcome challenges and get closer to earning their diplomas. I worry that forcing them to start over somewhere else could discourage some from continuing their education. For many, Highlands is their second chance and losing that opportunity would affect not only them but also their families and our community. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.

Uriel Medina

DECLARATION OF ZIA UL HAQ HABIBI IN SUPPORT OF DEBTOR'S EMERGENCY MOTION FOR ORDER EXTENDING STAY TO THE REVOCATION APPEAL UNDER BANKRUPTCY CODE SECTIONS 105(a) AND 362

I, Zia Ul Haq Habibi, hereby declare as follows:

1. I am a Teacher currently employed at Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), a California Non-Profit Corporation organized under the laws of the State of California, and the above-captioned debtor and debtor-in-possession in this voluntary chapter 11 case (the "Chapter 11 Case") filed on the date hereof (the "Petition Date") under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). I submit this declaration (this "Declaration") in support of the Debtor's Emergency Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362 (the "Motion"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. Except as otherwise indicated, all facts in this Declaration are based upon my personal knowledge, my discussions with the Debtor's management team and the Debtor's advisors, my review of relevant documents and information, or my opinions based upon my experience and knowledge. 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.

The Importance of HCCTS and the Impact of Its Closure

3. HCCTS has had a positive and meaningful impact on my professional life and on the students I teach. I am an adult English teacher at HCCTS, where I work with students who are building foundational English and literacy skills. I came to this work because I believe education can create opportunities for adults who have not always had access to traditional educational pathways. Teaching at HCCTS gives me the opportunity to serve an underserved population in our community and to help students build the language skills, confidence, and independence they need to reach their personal, educational, and employment goals.

4. Teaching at HCCTS is different from teaching at a traditional school, because our students are adults who are working toward a high school diploma, learning English, or

developing career and technical skills while also managing jobs, families, and other responsibilities. I teach adult English learners at different levels, including students who begin with very limited English or literacy skills. Despite the many responsibilities they carry outside of school, my students come to class because they want to learn, improve their lives, and become active members of the community. I see their commitment in the way they attend class, practice English, support one another, and continue working toward their goals even when learning is difficult.

5. In my experience, HCCTS plays an important role in the lives of the students it serves. I have personally seen students enter my class at Level Zero with very limited English and make significant progress over the course of a school year. Some of those students later reached out to me for letters of recommendation when they were ready to apply for jobs. I provided those letters, and they went on to obtain employment. They are now working, paying taxes, supporting their families, and contributing to the community. Their progress shows that learning English at HCCTS is not only about classroom achievement; it can help students become more independent and participate more fully in their communities. I am not aware of another school or program in the area that offers the same combination of tuition-free adult diploma completion, English language instruction, career and technical training, and student support services that HCCTS provides.

6. HCCTS is also important to me personally and professionally. Teaching at HCCTS is meaningful to me because I can see the direct impact of my work on adults who are trying to build better lives for themselves and their families. My position allows me to use my experience as an English teacher to serve students who may otherwise have limited access to education. Seeing a student move from learning basic English to communicating independently, pursuing employment, and participating more confidently in the community gives purpose to my work. My employment at HCCTS is also an important source of stability for me and my family.

7. HCCTS is part of the broader community it serves. I have seen this contribution directly through my students. When adult learners improve their English, they are better able to communicate at work, interact with schools and service providers, seek employment, support their

children and families, and participate in community life. I have also seen students use the education they received at HCCTS to obtain jobs and become contributing members of the local workforce. In this way, the school serves not only individual students but also their families, employers, and the broader community.

8. If HCCTS were forced to close or stop operating, I would lose my position and my ability to continue working with the students I currently work with, in the middle of the school year. Losing my position would interrupt work that is professionally meaningful to me and would prevent me from continuing to support students whose progress I have personally followed. It would also mean the loss of my employment and the stability that my position provides for me and my family.

9. A closure would also harm the students and the broader community. I saw this concern firsthand when media reports about the school began. Students came to me worried and asked, “Hey teacher, does it mean our school will close and we will not be able to learn English and achieve our goals?” Their question showed me how important HCCTS is to them and how much they depend on the school as a pathway toward their goals. Many of my students already balance work, family obligations, and other responsibilities just to attend school. A closure would interrupt their English learning, separate them from teachers and classmates who know their needs, and make it harder for them to continue progressing toward employment, independence, and greater participation in the community. I am not aware of another school nearby that could immediately take in HCCTS students and allow them to continue their education in the same way, without significant delay or disruption.

10. For these reasons, I respectfully request that the Court grant the relief requested in the Motion so that HCCTS can continue to operate and I can continue serving the students who depend on this school.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12 day of October, 2026, at Sacramento, California.



Zia Ul Haq Habibi