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Proposed Counsel for Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

In re Highlands Community Charter and Technical Schools, Debtor and Debtor in Possession.	Case No. 26-25868 Chapter 11 Adv No. 26-02134 DCN: SMR-1
Highlands Community Charter and Technical Schools, Plaintiff, v. Twin Rivers Unified School District Board of Trustees and California State Board of Education, Defendants.	<u>Hearing Information</u> Judge: Hon. Christopher D. Jaime Date: November 10, 2026 Time: 11:00 a.m. Place: Courtroom 32, Department B 501 I Street Sacramento, California 95814

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

I, Ori Katz, declare as follows:

1. I am a partner in the Finance and Bankruptcy Practice Group of the firm Sheppard, Mullin, Richter & Hampton LLP ("Sheppard Mullin" or the "Firm"), and as such am authorized to make this declaration on behalf of Sheppard Mullin. I am an attorney licensed to practice law in all of the courts of the State of California and in all of the United States District Courts in California. I am proposed counsel for Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor"), the debtor and debtor-in-possession, in the above-captioned chapter 11 case. The Debtor owns, manages and operates two adult-serving charter schools in Sacramento County: Highlands Community Charter School ("HCCS") and California Innovative Career Academy ("CICA" and, together with HCCS, the "Schools").

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

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

4. I am familiar with the chapter 11 filings and in preparing same, I obtained the Debtor's bylaws, a true and correct copy of which are attached as **Exhibit E** to the concurrently filed Exhibit List.

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

Executed on this 3rd day of November 2026, at San Francisco, California.

/s/ Ori Katz
Ori Katz