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Proposed Counsel for Highlands Community Charter and Technical Schools

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 DCN SMR-14 Judge: Hon. Christopher D. Jaime Date: November 10, 2026 Time: 11:00am Place: Courtroom 32 501 I Street Sacramento, California 95814

REVISED EXHIBIT IN SUPPORT OF DEBTOR'S APPLICATION TO EMPLOY KURTZMAN CARSON CONSULTANTS, LLC DBA VERITA GLOBAL AS ADMINISTRATIVE ADVISOR

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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"), hereby submits the following revised exhibit in support of the *Debtor's Application to Employ Kurtzman Carson Consultants, LLC dba Verita Global as Administrative Advisor*.

Exhibit	Description	Page(s)
A	Revised Proposed Order Authorizing Verita's Employment - *Redline against Docket No. 93*	3-6

Dated: November 6, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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

EXHIBIT A

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
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ORDER AUTHORIZING EMPLOYMENT OF KURTZMAN CARSON CONSULTANTS, LLC DBA VERITA GLOBAL, AS ADMINISTRATIVE ADVISOR

The Court, having considered the application (the "Application") of Highlands Community Charter and Technical Schools (the "Debtor") a California Non-Profit Corporation, and the debtor and debtor in possession in the above-captioned chapter 11 case (the "Bankruptcy Case"), for an order authorizing the employment of Kurtzman Carson Consultants, LLC dba Verita Global ("Verita") as administrative advisor (the "Administrative Advisor") to the Debtor (the "Application"), and the *Declaration of Evan Gershbein* and in support thereof, no objection being filed, and good cause appearing therefor,

IT IS HEREBY ORDERED:

1. The Application is approved.

2. The Debtor is authorized to employ Verita upon the terms and conditions set forth in the Application, Bankruptcy Code section 327 and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure.

~~3. Without further order of this Court, the Debtor is authorized to compensate Verita in accordance with the terms and conditions of the Services Agreement upon receipt of reasonably detailed monthly invoices setting forth the services provided by Verita and the rates charged for each, and to reimburse Verita for all reasonable and necessary expenses it may incur, upon the presentation of appropriate documentation, without the need for Verita to file fee applications or otherwise seek Court approval for the compensation of its services and reimbursement of its expenses as the Administrative Advisor.~~

3. Notwithstanding anything to the contrary in this Order, the Application, or Verita's service agreement, the Court is not approving Verita's terms and conditions of employment under 11 U.S.C. § 328(a). Verita shall file with this Court applications for the payment of fees in accordance with the procedures set forth in sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, any order of this Court or any applicable guidelines regarding submission and approval of fee applications, except for the fees and costs incurred pursuant to 28 U.S.C. § 156 which shall be governed by this Court's order at Docket No. 76. No funds from any retainer shall be disbursed until fees and expenses are awarded by the Court.

4. Professionals retained by the Debtor in this Chapter 11 Case have performed a significant amount of work after the Petition Date and before entry of this Order, and satisfy the exceptional circumstances exception for the compensation for pre-employment services. Any application or motion for compensation must distinguish between any services provided before the effective date of employment and services provided after the effective date of employment. The effective date of employment is the date of this Order.

5. In connection with any increases in Verita's rates ~~set forth in the Application~~, Verita shall provide reasonable notice (i.e. at least ten days) by filing notice of such increase at least ten (10) days prior to ~~filing a fee statement or fee application reflecting such an~~the effective date of such increase.

6. Notwithstanding any provision in Verita's services agreement to the contrary, approval of the Application shall not alter the result dictated by the holding in *Baker Botts L.L.P. v. ASARCO LLC*, 135 S. Ct. 2158, 2169 (2015) and its construction of 11 U.S.C. § 330(a)(1).

DATED:

_____

United States Bankruptcy Judge