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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-13 Judge: Hon. Christopher D. Jaime Date: November 10, 2026 Time: 11:00am Place: Courtroom 32 501 I Street Sacramento, California 95814

SUPPLEMENTAL DECLARATION OF JERRY W. SIMMONS IN SUPPORT OF APPLICATION TO EMPLOY THE LAW OFFICES OF YOUNG, MINNEY & CORR, LLP AS SPECIAL CHARTER SCHOOL COUNSEL

I, Jerry W. Simmons, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and a partner in the Sacramento office of the law firm Law Offices of Young, Minney & Corr, LLP ("YM&C"), the proposed special charter school counsel for Highlands Community Charter and Technical Schools ("HCCTS" or the "Debtor") a California Non-Profit Corporation, and the debtor and debtor in possession in the above-captioned chapter 11 case (the "Bankruptcy Case"). If called as a witness, I could and would testify competently thereto. My office is located at 655 University Avenue, Suite 150, Sacramento, California 95825.

2. This supplemental declaration is submitted pursuant to Bankruptcy Rules 2014(a) and 2016(b) and Bankruptcy Code sections 327 and 329 and in further support of the *Debtor's Application to Employ the Law Offices of Young, Minney & Corr, LLP as Special Charter School Counsel* (the "Application") filed on October 13 at Docket No. 86 and in response to informal questions submitted by the Office of the United States Trustee regarding YM&C's employment. I give capitalized terms not defined in this supplemental declaration the same meanings given to them in the Application.

Disclosure Pursuant to Fed. R. Bankr. Pro. 2016(b)

3. In further supplementation of the Application pursuant to Federal Rule of Bankruptcy Procedure 2016(b), YM&C confirms that its engagement as Proposed Special Charter School Counsel to the Debtor is governed solely by the terms disclosed in the Application. YM&C has not entered into any other fee agreement or compensation arrangement in connection with that engagement and has neither shared nor agreed to share any compensation with any other person or entity.

Retainer Amount

4. As of the Petition Date, YM&C holds a retainer in the amount of $514,951.61.

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5. 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 9th day of November, 2026, at Sacramento, California.

/s/ Jerry W. Simmons
JERRY W. SIMMONS