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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.[1]	Case No. 26-25868 Chapter 11 **DCN:** SMR-1 (App. For Order Shortening Time) SMR-2 (Extending Time to File Schedules) SMR-3 (Lease Rejections) SMR-4 (Cash Management) SMR-5 (Cash Use) SMR-6 (Utilities) SMR-7 (Insurance) SMR-8 (Claims and Noticing Agent) SMR-9 (Limiting Notice) SMR-10 (Wages and Benefits) **HEARING INFORMATION** Judge: Hon. Christopher D. Jaime Date: October 8, 2026 Time: **11:00 a.m. (Pacific Time)** Place: Courtroom 32 501 I Street Sacramento, California 95814

OMNIBUS NOTICE OF HEARING
ON DEBTOR'S EMERGENCY FIRST-DAY MOTIONS

PLEASE TAKE NOTICE that the Honorable Christopher D. Jaime, United States Bankruptcy Judge for the Eastern District of California - Sacramento Division, has scheduled an

[1] The last four digits of the Debtor's federal tax identification number is 0967. The mailing address for the Debtor is 1111 Howe Ave. Suite 505 Sacramento, CA 95825.

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emergency hearing on **Thursday, October 8, 2026, at 11:00 a.m. (Pacific Time)** in Courtroom 32 at 501 I Street, Sacramento, California 95814, to consider the below-listed emergency motions (each, an "Emergency Motion, and collectively, the "Emergency Motions") filed by the above-captioned debtor and debtor in possession (the "Debtor") in its chapter 11 bankruptcy case (the "Chapter 11 Case"). A copy of the Court's *Order: (I) Modifying LBR 9014-1(d) to Allow the Filing and Service of an Omnibus Notice of First Day Motions; (II) Shortening Notice with Respect to the First Day Motions; (III) Modifying LBR 9014-1(d)(5) to Allow Requests for Relief to be Joined in a Single Motion; and (IV) Modifying LBR 9014-1(d)(4) Solely for Procedural First Day Motions* is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that parties may appear at the hearing on the Emergency Motions either in person in Courtroom 32 at 501 I Street, Sacramento, California 95814, or by videoconference using the following procedures:

https://www.caeb.uscourts.gov/documents/Forms/Misc/ZoomGov%20Protocols.pdf

PLEASE TAKE FURTHER NOTICE that the Emergency Motions, and other papers filed in support of the Emergency Motions, in the Chapter 11 Case are available free of charge at www.veritaglobal.net/HCCTS.

PLEASE TAKE FURTHER NOTICE that the Emergency Motions, and other papers filed in support of the Emergency Motions, will be served upon you on October 5, 2026 by either first class mail, overnight delivery, facsimile, or email (where available). Any parties seeking to obtain additional copies may also do so by contacting proposed counsel to the Debtor whose contact information is as follows: Sheppard, Mullin, Richter & Hampton LLP, Four Embarcadero Center, 17th Floor, San Francisco, California 94111-4109, Attn: Ori Katz (okatz@sheppard.com) and Kirk Rider (krider@sheppard.commailto:nkoffroth@foxrothschild.com).

PLEASE TAKE FURTHER NOTICE that any opposition to the relief requested in any Emergency Motion may be presented at the above-listed hearing on the respective Emergency Motion (the "First-Day Hearing"). If you do not want the Court to grant the relief sought in any of the Emergency Motions, or if you want the Court to consider your response to any of the Emergency Motions, then you should appear at the First-Day Hearing to state your opposition or response.

The Emergency Motions that the Court will consider at the First-Day Hearing are:

1. *Debtor's Ex Parte Application for Entry of an Order: (I) Modifying LBR 9014-1(d) to Allow the Filing and Service of an Omnibus Notice of First Day Motions; (II) Shortening Notice with Respect to the First Day Motions; (III) Modifying LBR 9014 1(d)(5) to Allow Requests for Relief to be Joined in a Single Motion; and (IV) Modifying LBR 9014-1(d)(4) Solely for Procedural First Day Motions;*

2. *Debtor's Emergency Motion for an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs;*

3. *Debtor's Emergency Motion for Entry of An Order Authorizing Rejection of Certain Unexpired Leases;*

4. *Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Bank Accounts; (B) Continue Use of Cash Management System; (C) Continue Use of Business Forms; and (D) Honor Certain Prepetition Obligations Related thereto; (II) Waiving Requirements of LBR 2015-2; (III) Granting Limited Waiver of Section 345(b) Deposit Requirements; and (IV) Granting Related Relief;*

5. *Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Use Cash in the Ordinary Course of Business in Accordance with Approved Budget; (II) Authorizing the State of California to Recover Prepetition Overpayments from Future Apportionments; (III) Finding that Holders of Equipment Liens Are Adequately Protected; and (IV) Granting Related Relief;*

6. *Debtor's Emergency Motion For Interim and Final Orders: (1) Approving Debtor's Adequate Assurance of Payment For Utility Services: (2) Prohibiting Utility Providers From Altering. Refusing, or Discontinuing Service; (3) Approving Debtor's Proposed Procedures; and (4) Granting Related Relief; and*

7. *Debtor's Emergency Motion for Interim and Final Orders: (I) Authorizing the Debtor to Maintain, Renew, or Supplement Its Insurance Policies and Satisfy All Obligations Related Thereto; and (II) Granting Related Relief;*

8. *Debtor's Emergency Application For Order Authorizing and Approving the Appointment of Kurtzman Carson Consultants, LLC dba Verita Global as Notice, Claims, and Solicitation Agent;*

9. *Debtor's Emergency Motion for Order Limiting Scope of Notice;* and

10. *Debtor's Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Pay Prepetition Wages, Salaries, and Other Compensation, (B) Continue Employee Benefits, (C) Honor Certain Prepetition Obligations Related Thereto; and (II) Granting Related Relief.*

Dated: October 5, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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

EXHIBIT A

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
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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.[1]	Case No. 26-25868 Chapter 11 **DCN: SMR-1** Hon. Christopher D. Jaime **Hearing Information** Hearing Date: [●] Location: Courtroom 32 501 I Street Sacramento, California 95814 [*Relief requested on an ex parte basis*]

ORDER (I) MODIFYING LBR 9014-1(d) TO ALLOW THE FILING AND SERVICE OF AN OMNIBUS NOTICE OF FIRST DAY MOTIONS, (II) SHORTENING NOTICE WITH RESPECT TO THE FIRST DAY MOTIONS, (III) MODIFYING LBR 9014-1(d)(5) TO ALLOW REQUESTS FOR RELIEF TO BE JOINED IN A SINGLE MOTION, AND (IV) MODIFYING LBR 9014-1(d)(4) SOLELY FOR PROCEDURAL FIRST DAY MOTIONS

[1] The last four digits of the Debtor's federal tax identification number is 0967. The mailing address for the Debtor is 1111 Howe Ave., Suite 505, Sacramento, CA 95825.

This Court, having considered the *Debtor's Ex Parte Application for Entry of an Order (I) Modifying LBR 9014-1(d) to Allow the Filing and Service of an Omnibus Notice of First Day Motions, (II) Shortening Notice with Respect to the First Day Motions, (III) Modifying LBR 9014-1(d)(5) to Allow Requests for Relief to Be Joined in a Single Motion, and (IV) Modifying LBR 9014-1(d)(4) Solely for Procedural First Day Motions* (the "Application")[2] of Highlands Community Charter and Technical Schools, the above-captioned debtor and debtor in possession (the "Debtor"), filed on the Petition Date; and upon the First Day Declaration; and upon the Raymond Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and General Orders 182 and 223 of the United States District Court for the Eastern District of California; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtor's notice of the Application is reasonable and sufficient under the circumstances, and no other or further notice need be provided; and this Court having found that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein and that such relief is necessary to avoid immediate and irreparable harm pursuant to Bankruptcy Rule 6003; and the Court having found cause for consideration of the Application on an *ex parte* basis; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is granted in its entirety.

2. The Debtor shall file and serve a single, omnibus notice of the Hearing on the First Day Motions (the "Omnibus Notice") on the Notice Parties in the manner set forth in the Application. The Hearing on the First Day Motions shall take place on the date and time set forth

[2] Capitalized terms used but not defined herein have the meanings assigned to them in the Application.

in the Omnibus Notice. Proof of service of such Omnibus Notice on the Notice Parties shall be sufficient to provide notice of the Hearing on the First Day Motions; *provided*, *however*, that the Court may require other or further notice of any final hearing on a First Day Motion. LBR 9014-1(d) is hereby modified to the extent necessary to permit the foregoing Omnibus Notice procedure for the First Day Motions.

3. The periods required for notice of the Hearing on the First Day Motions are hereby modified and shortened; *provided*, *however*, that service of all documents for the First Day Motions on the Notice Parties, by either email, facsimile, first class mail, or overnight delivery, not later than twenty-four (24) hours prior to the date and time set for the Hearing, shall be deemed sufficient notice to have the matter heard at the Hearing.

4. Any opposition to the relief requested in a First Day Motion may be presented at the hearing on the respective First Day Motion.

5. Parties may appear at the hearings on the First Day Motions by videoconference using the following procedures:

https://www.caeb.uscourts.gov/documents/Forms/Misc/ZoomGov%20Protocols.pdf.

6. To the extent necessary and typical, LBR 9014-1(d)(5) is modified to permit the Debtor to join multiple requests for relief in the First Day Motions.

7. To the extent necessary, LBR 9014-1(d)(4) is modified to expand the page limitation from six to ten pages solely for the Procedural First Day Motions.

8. The Court will retain jurisdiction to implement and enforce the terms of this Order.

Dated: October 05, 2026

Christopher D. Jaime, Chief Judge
United States Bankruptcy Court