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SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
ORI KATZ, State Bar No. 209561
KIRK RIDER, State Bar. No. 364539
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
Telephone: (415) 434-9100
Facsimile: (415) 434-3947
Email: okatz@sheppard.com
krider@sheppard.com

[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-3 (Lease Rejections) SMR-4 (Cash Management) SMR-5 (Cash Use) SMR-6 (Utilities) SMR-7 (Insurance) SMR-10 (Wages and Benefits) **HEARING INFORMATION** Judge: Hon. Christopher D. Jaime Date: November 10, 2026 Time: **11:00 a.m. (Pacific Time)** Place: Courtroom 32 501 I Street Sacramento, California 95814

OMNIBUS NOTICE OF FINAL HEARING ON DEBTOR'S EMERGENCY 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.

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PLEASE TAKE NOTICE that the Honorable Christopher D. Jaime, United States Bankruptcy Judge for the Eastern District of California - Sacramento Division, has scheduled a final hearing on **Tuesday, November 10, 2026, at 11:00 a.m. (Pacific Time)** in Courtroom 32 at 501 I Street, Sacramento, California 95814 (the "Final First-Day Hearing"), 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") on a final basis.

PLEASE TAKE FURTHER NOTICE that parties may appear at the Final First-Day 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 any supplements to the Emergency Motions, and other supplemental pleadings and papers filed in support of the Emergency Motions, will be served upon you on October 15, 2026 by either first class mail, overnight delivery, facsimile, or email (where available), or via the Electronic Court Filing System for those parties that have filed a notice of appearance in the Chapter 11 Case. 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 final relief requested in any Emergency Motion must be filed in the Chapter 11 Case and be served on proposed counsel to the Debtor by no later than **October 22, 2026** (the "Objection Deadline"). If you do not want the Court to grant the relief sought in any of the Emergency Motions on a final basis, or if you want the Court to consider your response to any of the Emergency Motions, then you should file your

opposition or response by the Objection Deadline. Any Replies in further support of any of the Emergency Motions must be filed in the Chapter 11 Case by no later than **October 29, 2026**.

The Emergency Motions that the Court will consider on a final basis at the Final First-Day Hearing are:

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

2. *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;*

3. *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;*

4. *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*

5. *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;* and

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6. *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 12, 2026

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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