ROB BONTA, State Bar No. 202668
Attorney General of California
ANJANA N. GUNN, State Bar No. 251200
Supervising Deputy Attorney General
COLIN D. SCHOELL, State Bar No. 332896
Deputy Attorney General
600 West Broadway, Suite 1800
San Diego, CA 92101
Telephone: (619) 321-5862
Fax: (916) 732-7920
E-mail: Colin.Schoell@doj.ca.gov
Attorneys for Defendant
California State Board of Education

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

IN RE **HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS,** Debtor and Debtor in Possession	Case No. 26-25868 Chapter 11 Adv No. 26-02134 **JOINT STIPULATION TO STAY THE ADVERSARY PROCEEDING AND ALL ASSOCIATED DEADLINES** Courtroom: 32 Judge: The Hon. Christopher D. Jaime Action Filed: October 4, 2026
HIGHLANDS COMMUNITY CHARTER AND TECHNICAL SCHOOLS, Plaintiff, **v.** **TWIN RIVERS UNIFIED SCHOOL DISTRICT BOARD OF TRUSTEES; CALIFORNIA STATE BOARD OF EDUCATION,** Defendants.	

This stipulation ("Stipulation") staying the adversary proceeding and all associated deadlines is entered into by and among Plaintiff and Debtor in Possession Highlands Community Charter and Technical Schools ("Plaintiff") and Defendants California State Board of Education

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and Twin Rivers Unified School District Board of Trustees ("Defendants") (collectively, "the Parties"), with reference to the following facts and recitals:

RECITALS

1. On October 4, 2026, Plaintiff filed a Chapter 11 petition for relief.

2. On October 13, 2026, Plaintiff filed the complaint in adversary proceeding number 26-02134, and a Motion for Order Extending Stay to the Revocation Appeal Under Bankruptcy Code Sections 105(a) and 362 ("Motion for Stay"). This Court issued the summons in this adversary proceeding the next day, on October 14, 2026.

3. Following briefing by the Parties, on November 10, 2026, this Court heard the Motion for Stay and issued its Order Granting Motion for Injunction Under 11 U.S.C. § 105(a) ("Stay Order"). The Stay Order enjoined Defendants' hearing on the appeal of the charter revocation action, and "all further and other actions to revoke, terminate, cancel, annul, modify, or otherwise affect the Schools' Charters" through "June 30, 2027, or further order of this court." Stay Order, 22, ECF No. 33.

4. The Parties have discussed the above and agree to stipulate to a stay of the adversary proceeding and all associated deadlines for 90 days, without prejudice to further extensions, in order to trail the Chapter 11 reorganization plan process.

STIPULATION

NOW, THEREFORE, the Parties hereby agree and stipulate that, subject to this Court's approval:

1. That the adversary proceeding and all associated deadlines be stayed 90 days, without prejudice to any further extensions.

2. That Defendants' responsive pleadings to the complaint will be due 30 days after the expiration of the stay of the adversary proceeding. All other statutory deadlines, including discovery and the scheduling conference, will run from the expiration of the stay of the adversary proceeding.

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IT IS SO STIPULATED.

Dated: November 18, 2026

Respectfully submitted,

ORI KATZ
Attorney for Plaintiff
Highlands Community Charter and Technical Schools

Dated: November 18, 2026

Respectfully submitted,

GABRIEL HERRERA
Attorney for Defendant
Twin Rivers Unified School District Board of Trustees

Dated: November 18, 2026

Respectfully submitted,

ROB BONTA
Attorney General of California
ANJANA N. GUNN
Supervising Deputy Attorney General

COLIN D. SCHOELL
Deputy Attorney General
Attorneys for Defendant
California State Board of Education

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