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9 PATRIOT SCIENTIFIC CORPORATION

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

13 In re:

14 }
15 } **TECHNOLOGY PROPERTIES**
16 } **LIMITED LLC,**
17 } **fka TECHNOLOGY PROPERTIES**
18 } **LIMITED INC., A CALIFORNIA**
19 } **CORPORATION,**
20 } **fka TECHNOLOGY PROPERTIES**
21 } **LIMITED,**
22 } **A CALIFORNIA CORPORATION,**

23 Debtor.

Case No. 13-51589-SLJ-11

Chapter 11

Date: October 14, 2014

Time: 1:30 p.m.

Place: United States Bankruptcy Court
280 S. First Street, Room 3099
San Jose, CA 95113

Judge: Honorable Stephen L. Johnson

24 **AMENDED OBJECTION BY PATRIOT SCIENTIFIC CORPORATION**
25 **TO JOINT DISCLOSURE STATEMENT**

26 **I. INTRODUCTION**

27 Patriot Scientific Corporation ("Patriot"), a creditor, hereby amends its objection
28 filed on October 1, 2014 to the Joint Disclosure Statement ("Statement") filed by the
Debtor and the Official Committee of Unsecured Creditors ("OCUC"). The Statement
does not provide adequate information within the meaning of 11 U.S.C. § 1125.

OBJECTION

1
2 1. The Statement does not contain "adequate information" within the meaning
3 of section 1125 of the Bankruptcy Code and cannot be approved unless it is modified to
4 provide additional and clarifying information.

5 2. Section 1125(b) of the Bankruptcy Code conditions a debtor's solicitation of
6 votes on a proposed chapter 11 plan on the bankruptcy court's determination that the
7 disclosure statement contains "adequate information." The Bankruptcy Code defines
8 adequate information as:

9 [I]nformation of a kind, and in sufficient detail, as far as is
10 reasonably practicable in light of the nature and history of the
11 debtor and the condition of the debtor's books and records, that
12 would enable a hypothetical reasonable investor typical of
13 claims or interests in the relevant class to make an informed
14 judgment about the plan . . .

15 3. The Statement provides at p. 56:

16 "Patriot contends that any controversies arising out of the [July
17 2014] PDS-Alliacense Agreement must be resolved prior to
18 and as a condition of Plan confirmation, and that certain
19 controversies still exist arising out of obligations under the
20 PDS-Alliacense Agreement, including the following:

21 (1) obtaining TPL's approval of a second MMP licensing
22 company as appointed by PDS, and (2) appointment of a third
23 PDS Manager. Patriot also contends that upon
24 accomplishment of the former obligation, the PDS-Alliacense
25 Agreement provides that Alliacense is obligated to deliver the
26 lists of prospective licensees to be considered (and associated
27 work product) to PDS."
28

1 its intention to perform its obligation under the July 2014 Agreement to share information
2 about prospective licensees to be utilized by the new firm.

3 10. The Disclosure Statement should be amended to reflect the significant risk
4 that the MMP licensing program will not resume for some time, or at all, in light of this
5 latest round of disputes caused by Dan Leckrone's conflicted ownership of TPL and
6 Alliacense.

7 **CONCLUSION**

8 Wherefore, Patriot prays that the Court appropriately note these objections.

9
10 DATED: October 10, 2014

LAW OFFICES OF GREGORY CHARLES

11
12 By: /s/ Gregory J. Charles
13 Gregory J. Charles

14 DATED: October 10, 2014

KIRBY NOONAN LANCE & HOGE LLP

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16 By: / Charles T. Hoge
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18 Attorneys for Creditor
19 Patriot Scientific Corporation

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CERTIFICAT OF SERVICE

I am over eighteen years of age, not a party, and employed in San Jose, California at the above address. I am familiar with the processing of documents for delivery noted below. I caused to be served the following on the date listed below:

1. AMENDED OBJECTION BY PATRIOT SCIENTIFIC CORPORATION TO JOINT DISCLOSURE STATEMENT

✓ ECF: I caused the document[s] to be sent to the person[s] at the e-mail address[es] listed below through the electronic court filing system maintained by the court in this action.

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I declare that the above is true and correct.

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