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13 UNITED STATES BANKRUPTCY COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION

16 In re  
17 TECHNOLOGY PROPERTIES LIMITED,  
18 LLC,  
19 Debtor.

20 Case No. 13-51589-SLJ-11

21 Chapter 11

22 **HEWLETT-PACKARD COMPANY'S  
23 LIMITED OBJECTION AND  
24 RESERVATION OF RIGHTS WITH  
25 RESPECT TO THE MOORE  
26 DISCLOSURE STATEMENT**

27 Date: October 2, 2014

28 Time: 3:00 p.m.

Place: United States Bankruptcy Court  
Courtroom 3099  
280 South First Street  
San Jose, California

29 Hewlett-Packard Company ("HP") hereby files this limited objection and  
30 Reservation of Rights with respect to the *Disclosure Statement re: Moore Monetization Plan*  
31 *of Reorganization dated August 28, 2014* (Moore Disclosure Statement") [Docket No. 520].

32 HP respectfully states as follows:

33 1. HP entered into a non-exclusive patent license with TPL under the  
34 Moore Microprocessor Portfolio (the "MMP Portfolio") on or about January 16, 2006 (as the

1 same has been amended or modified, the “HP License”). HP is also a litigant against TPL in  
2 a case pending in front of the United States District Court for the Northern District of  
3 California with respect to the CORE Flash Portfolio.<sup>1</sup>

4 2. HP seeks to preserve all of its rights, claims, defenses, and interests in  
5 connection with the HP License. Under section 1125(a) of the Bankruptcy Code, HP is  
6 entitled to full and fair disclosure of the treatment of the HP license under the Plan.

7 3. HP has participated in ongoing discussions with counsel to the Debtor  
8 and Committee to protect HP’s defenses and rights as a licensee. While the Moore  
9 Disclosure Statement and Moore Monetization Plan of Reorganization dated August 28,  
10 2014 (“Moore Plan”) incorporate most of the language and protections previously negotiated  
11 with the Debtor and Committee,<sup>2</sup> they do not contain all of these protections. For example,  
12 the Moore Disclosure Statement is currently silent as to what happens to the licensee  
13 protections found in section XVI if the Moore Plan is terminated or converted to Chapter 7.  
14 In addition, page 65 of the Moore Disclosure Statement (Article XVI section B,  
15 Confirmation Order), omitted the following provision previously negotiated with the Debtor  
16 and Committee, “Whether or not any IP Owner objects to or supports the Plan, or votes for or  
17 against the Plan, the Confirmation Order shall prevent such IP Owner from defeating,  
18 violating or disputing any of the Licensees’ rights, licenses, interests, defenses or other  
19 benefits under such parties’ respective Licenses or this Article XVI.” HP believes that these  
20 changes should be made to the Moore Disclosure Statement and Moore Plan.

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23 <sup>1</sup> HP is filing this limited objection to protect its rights as a licensee. HP does not consent to jurisdiction of the  
24 Bankruptcy Court with respect to any patent litigation. This Limited Objection shall not be deemed or construed to  
25 be a waiver of the rights of HP under applicable law or in equity, including but not limited to, the right (i) to have  
26 final orders entered only after de novo review by a district judge in applicable matters, (ii) to trial by jury in any  
27 proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (iii) to have the  
28 District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to  
assert or exercise any other rights, claims, actions, defenses, setoffs or recoupments to which HP is or may be  
entitled, all of which are expressly reserved.

<sup>2</sup> HP is in the process of reviewing the Joint Disclosure Statement and Amended Joint Plan filed by the Debtor and  
Committee, and reserves its rights to object the Joint Disclosure Statement and Amended Joint Plan.



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Dated: September 25, 2014

Respectfully submitted,

By:  /s/ Stefanie A. Elkins

Stefanie A. Elkins

Attorneys for Hewlett-Packard Company

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In re  
TECHNOLOGY PROPERTIES LIMITED,  
LLC,  
Debtors.

Case No. 13-51589-SLJ-11  
Chapter 11  
**CERTIFICATE OF SERVICE**

1 **CERTIFICATE OF SERVICE**

2 I, Juliet Quiambao, hereby declare:

3 I am over the age of 18 years and not a party to or interested in the within  
4 entitled cause. I am an employee of Friedman & Springwater LLP and my business address  
is 33 New Montgomery Street, Suite 290, San Francisco, California 94105.

5 On September 25, 2014, at my place of business as listed above, I served a true  
6 and correct copy of the following document(s):

7 **HEWLETT-PACKARD COMPANY’S LIMITED OBJECTION AND  
8 RESERVATION OR RIGHTS WITH RESPECT TO THE MOORE  
9 DISCLOSURE STATEMENT**

in the manner indicated below:

10  By Electronic Filing said document(s) and transmission of the Notification of  
Electronic Filing by the Clerk to a Registered Participant(s), addressed as follows:

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I declare under penalty of perjury, under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed at San Francisco, California on September 25, 2014.

/s/ Juliet Quiambao  
Juliet Quiambao