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

15 **In re:**
16 **TECHNOLOGY PROPERTIES**
17 **LIMITED LLC, a California limited**
18 **liability company**

19 **Debtor.**

CASE NO. 13-51589-SLJ

Chapter 11

Date: October 2, 2014
Time: 3:00 p.m.
Place: United States Bankruptcy Court
280 South First Street
Courtroom 3099
San Jose, California

**SANDISK'S JOINDER TO OBJECTION OF
STMICROELECTRONICS, INC. TO
DISCLOSURE STATEMENT RE: MOORE
MONETIZATION PLAN OF
REORGANIZATION DATED AUGUST 28, 2014**

21 STMicroelectronics, Inc. ("STMicro") and SanDisk Corporation ("SanDisk") are
22 defendants in certain litigation commenced by Technology Properties Limited LLC (the "Debtor")
23 in the United States District Court for the District of Delaware (the "Fast Logic Litigation")¹.

24 ¹ SanDisk does not consent to jurisdiction of the Bankruptcy Court with respect to the Fast
25 Logic Litigation. This Joinder shall not be deemed or construed to be a waiver of the rights of
26 SanDisk under applicable law or in equity, including but not limited to, the right (i) to have final
27 orders entered only after de novo review by a district judge in applicable matters, (ii) to trial by jury in
28 any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases,
(iii) to have the 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 SanDisk is or may be entitled, all of which are expressly reserved.

Joinder to STMicro Objection

1 SanDisk hereby joins in the *Objection of STMicroelectronics, Inc. to Disclosure Statement*
2 *re: Moore Monetization Plan of Reorganization dated August 28, 2014* (the “STMicro Objection”)
3 filed at Docket No. 549 on September 25, 2014 and requests the same relief as STMicro -- that
4 the Court not approve the Moore Disclosure Statement² without further disclosure about the
5 Markman decision, projections on the costs and expected recoveries and claims/risk of substantial
6 fee shifting concerning the Fast Logic Litigation.

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8 Dated: September 26, 2014

JONES DAY

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10 By: /s/ Lori Sinanyan

Richard L. Wynne

Lori Sinanyan

Attorneys for SanDisk Corporation

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² Terms not defined herein shall have the meaning given to them in the STMicro Objection.