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6 UNITED STATES BANKRUPTCY COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN JOSE DIVISION

9 IN RE:  
10 TECHNOLOGY PROPERTIES LIMITED, LLC  
11 DEBTORS.

Case No. 13-51589 SLJ

Chapter 11

PATRIOT SCIENTIFIC CORP.'S MOTION TO  
MODIFY THE AUTOMATIC STAY

DATE: JULY 22, 2014

TIME: 10.00 AM

PLACE: UNITED STATES BANKRUPTCY  
COURT

280 S. FIRST STREET, ROOM 3099  
SAN JOSE, CA 95113

JUDGE: HONORABLE STEPHEN L. JOHNSON

18 To the extent necessary, Patriot Scientific Corp. ("Patriot") seeks relief from the  
19 automatic stay to amend a demand in a pending arbitration to add Technology  
20 Properties Limited, LLC ("TPL") as a respondent. Patriot further seeks relief to  
21 prosecute the arbitration to final award.

22 This motion is based upon the following undisputed facts.

23 1. Patriot and TPL are members of a joint venture, Phoenix Digital  
24 Solutions, LLC ("PDS").

25 2. The PDS Operating Agreement provides for three managers.

26 3. Patriot and TPL each appoint one manager, and they mutually select an  
27 independent manager.

28 4. TPL will not consent to the appointment of an independent manager.

1           5.       The PDS Operating Agreement specifically states that the American  
2 Arbitration Association will appoint the third manager in the event that an agreement  
3 cannot be reached.

4           6.       Patriot does not seek monetary relief in the Arbitration.

5           This motion is based upon the contemporaneously filed Notice of Hearing,  
6 Memorandum of Points and Authorities in support of the motion, the Declaration of  
7 Clifford Flowers and its exhibits, and the entire record of this proceeding.

8           Pursuant to B.L.R. 4001-1 Patriot hereby advises that TPL should appear  
9 personally or by counsel at the preliminary hearing.

10 Dated: July 1, 2014

Law Offices of Gregory Charles

11  
12 By: s/ Gregory Charles  
13 Gregory Charles  
14 Attorneys for the Plaintiffs  
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UNITED STATES BANKRUPTCY COURT  
Northern District of California

In re:

Bankruptcy No.:

R.S. No.:

Hearing Date:

Time:

Debtor(s)

Relief From Stay Cover Sheet

Instructions: Complete caption and Section A for all motions. Complete Section B for mobile homes, motor vehicles, and personal property. Complete Section C for real property. Utilize Section C as necessary. If moving party is not a secured creditor, briefly summarize the nature of the motion in Section D.

(A) Date Petition Filed: \_\_\_\_\_ Chapter: \_\_\_\_\_  
 Prior hearings on this obligation: \_\_\_\_\_ Last Day to File §523/§727 Complaints: \_\_\_\_\_

(B) Description of personal property collateral (e.g. 1983 Ford Taurus):

Secured Creditor [ ] or lessor [ ]

Fair market value:	\$ _____	Source of value:	_____
Contract Balance:	\$ _____	Pre-Petition Default:	\$ _____
Monthly Payment:	\$ _____	No. of months:	_____
Insurance Advance:	\$ _____	Post-Petition Default:	\$ _____
		No. of months:	_____

(C) Description of real property collateral (e.g. Single family residence, Oakland, CA):

Fair market value: \$ \_\_\_\_\_ Source of value: \_\_\_\_\_ If appraisal, date: \_\_\_\_\_

Moving Party's position (first trust deed, second, abstract, etc.):

Approx. Bal.	\$ _____	Pre-Petition Default:	\$ _____
As of (date):	_____	No. of months:	_____
Mo. payment:	\$ _____	Post-Petition Default:	\$ _____
Notice of Default (date):	_____	No. of months:	_____
Notice of Trustee's Sale:	_____	Advances Senior Liens:	\$ _____

Specify name and status of other liens and encumbrances, if known (e.g. trust deeds, tax liens, etc.):

Position	Amount	Mo. Payment	Defaults
1 <sup>st</sup> Trust Deed: _____	\$ _____	\$ _____	\$ _____
2 <sup>nd</sup> Trust Deed: _____	\$ _____	\$ _____	\$ _____
_____:			
_____:			
_____:			
(Total)	\$ _____	\$ _____	\$ _____

(D) Other pertinent information:

Dated: 7/8/14

s/ Gregory Charles  
 \_\_\_\_\_  
 Signature  
 \_\_\_\_\_  
 Print or Type Name

Attorney for \_\_\_\_\_ Patriot Scientific Corporation