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6 Attorneys For Creditor Charles H. Moore

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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION

11 IN RE:

12 TECHNOLOGY PROPERTIES LIMITED,  
LLC, a California corporation,

13 Debtor.

Case No.: 13-51589-SLJ-11

Chapter 11

14 Date: October 1, 2014  
Time: 2:00 p.m.  
Place: Courtroom 3099  
280 South First Street  
San Jose, California

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17 **CREDITOR CHARLES H. MOORE'S MOTION TO APPOINT CHAPTER 11 TRUSTEE AND TO**  
18 **REMOVE DEBTOR-IN-POSSESSION**

19 Creditor Charles H. Moore hereby moves the Court for an order appointing a chapter 11  
20 trustee and removing the debtor-in-possession pursuant to 11 U.S.C. Section 1104(a)(2) and  
21 1104(a)(1) (Creditor Moore's "Motion").

22 Creditor Moore's Motion will be based on this motion, the notice of hearing, the  
23 memorandum of points and authorities, the request for judicial notice, the declaration of  
24 Charles H. Moore and all the papers, records, and pleadings on file in this action, and such  
25 other evidence as may be presented at the hearing on this motion.

26 Dated: September 3, 2014

Chiles and Prochnow, LLP

27 By:           /s/ Kenneth H. Prochnow            
28 Kenneth H. Prochnow, Attorneys for  
Creditor Charles H. Moore