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7 Attorneys for Official Committee of
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8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN JOSE DIVISION**

12 In re:)
13 **TECHNOLOGY PROPERTIES LIMITED LLC,**) Case No. 13-51589-SLJ-11
fka TECHNOLOGY PROPERTIES LIMITED)
14 **INC., A CALIFORNIA CORPORATION,**) Chapter 11
fka TECHNOLOGY PROPERTIES LIMITED,)
15 **A CALIFORNIA CORPORATION,**) Date: July 3, 2014
16 Debtor.) Time: 1:30 p.m.
Place: United States Bankruptcy Court
280 S. First Street, Room 3099
17 San Jose, CA 95113
Judge: Honorable Stephen L. Johnson

18
19 **NOTICE OF INTENT TO REQUEST CONTINUANCE OF MATTERS**
20 **SCHEDULED FOR HEARING ON JULY 3, 2014**

21 **To: THE UNITED STATES TRUSTEE, SECURED CREDITORS AND OTHER PARTIES IN INTEREST:**

22 **PLEASE TAKE NOTICE OF THE FOLLOWING:**

23 1. On March 20, 2013 (the "Petition Date"), Technology Properties Limited LLC (the
24 "Debtor") commenced the above-entitled Chapter 11 bankruptcy case by filing a Voluntary Petition
25 in this Court.

26 2. A trustee has not been appointed for the Debtor, and it continues to function as the
27 debtor-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108.

28 3. On March 28, 2013, the Office of the United States Trustee appointed the Official

1 Committee of Unsecured Creditors (the “Committee”) in this case, pursuant to 11 U.S.C. § 1102.

2 4. On December 17, 2013, the Committee filed the MOTION OF CREDITORS’ COMMITTEE
3 FOR ORDERS: (1) DIRECTING THE APPOINTMENT OF A CHAPTER 11 TRUSTEE; AND (2) DIRECTING
4 THE DEBTOR AND DANIEL E. LECKRONE TO APPEAR AND SHOW CAUSE WHY THEY SHOULD NOT BE
5 HELD IN CONTEMPT OF COURT FOR VIOLATION OF THIS COURT’S ORDER [Docket No. 313] (the
6 “Trustee Motion”).

7 5. On January 13, 2014, the Committee filed the MOTION FOR ORDER GRANTING LEAVE,
8 STANDING AND AUTHORITY TO COMMENCE AND PROSECUTE CLAIMS OF THE DEBTOR’S ESTATE
9 [Docket No. 360] (together with the Trustee Motion, the “Committee Motions”).

10 6. On February 14, 2014, the Committee filed its DISCLOSURE STATEMENT
11 FOR OFFICIAL COMMITTEE OF UNSECURED CREDITORS’ PLAN OF REORGANIZATION (FEBRUARY 14,
12 2014) [Docket No. 436] (the “Committee Disclosure Statement”).

13 7. Also on February 14, 2014, the Debtor filed the DISCLOSURE STATEMENT RE:
14 TPL PLAN OF REORGANIZATION (FEBRUARY 14, 2014) [Docket No. 437] (together with the
15 Committee Motions and the Committee Disclosure Statement, the “Pending Matters”).

16 8. The Court has continued the hearing on the Pending Matters on several occasions,
17 including most recently to July 3, 2014, as it is presently set. The Committee, with the Debtor’s
18 consent, intends to appear before the Court on such date to request a short continuance of the hearing
19 on the Pending Matters to a date during the week of July 7 or as soon as possible consistent with the
20 Court’s calendar.

21 9. Parties in interest with questions regarding the foregoing may contact counsel for the
22 Committee at the contact information provided at the top of the first page of this Notice.

23 Dated: July 2, 2014

DORSEY & WHITNEY, LLP

24
25 By: /s/ Robert A. Franklin

Robert A. Franklin

Attorneys for the

Official Committee of Unsecured Creditors

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17 San Jose, CA 95113
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18
19 **CERTIFICATE OF SERVICE**

20 STATE OF CALIFORNIA)
21) ss.
COUNTY OF SANTA CLARA)

22 I am a citizen of the United States and employed in Santa Clara County. I am over the age of
23 eighteen years and not a party to the above-entitled action; my business address is 305 Lytton
24 Avenue, Palo Alto, California 94301.

25 On July 2, 2014, at my place of business, I served a true and correct copy of the following
26 document(s):

27 **NOTICE OF INTENT TO REQUEST CONTINUANCE OF MATTERS**
28 **SCHEDULED FOR HEARING ON JULY 3, 2014**

1 in the manner indicated below:

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

4 United States Trustee
Office of the U.S. Trustee
John S. Wesolowski
5 E-mail: john.wesolowski@usdoj.gov

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6 Office of the U.S. Trustee/SJ
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7 ltroxas@hotmail.com

8 **Request For Special Notice**

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By Mail by enclosing said document(s) in an envelope and depositing the sealed envelope with the United States Postal Service with the postage fully prepaid, addressed as follows:

Counsel for Chester A. & Marcie Brown, Jr.
Sallie Kim, Esq.
GCA Law Partners LLP
2570 W. El Camino Real, Suite 510
Mountain View, CA 94040

This Certificate was executed on July 2, 2014 at Palo Alto, Santa Clara County, California. I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sandra Bloomer
SANDRA BLOOMER