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13 TECHNOLOGY PROPERTIES LIMITED LLC

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFONRIA**  
16 **SAN JOSE DIVISION**

17 In re:	Case No.: 13- 51589SLJ
18 TECHNOLOGY PROPERTIES LIMITED, 19 LLC, a California limited liability company, 20 Debtor.	Chapter 11

21 **NOTICE OF OBJECTION TO CLAIM NOS. 26, 26-1 AND 26-2 OF CHARLES H.**  
22 **MOORE AND OPPORTUNITY TO REQUEST HEARING**

23 TO CHARLES H. MOORE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS;  
24 THE UNITED STATES TRUSTEE; and THEIR RESPECTIVE COUNSEL.

25 NOTICE IS HEREBY GIVEN that Debtor and Debtor-in-Possession Technology  
26 Properties Limited LLC (“Debtor”) objects to Claim Nos. 26, 26-1, and 26-2 filed by Charles H.  
27 Moore in the amount of \$30,195,000 for the reasons and on the grounds set forth in the  
28 Objection to Claim Nos. 26, 26-1, and 26-2 (“Objection”), which is being served upon you  
concurrently herewith. The Debtor requests that the claim be disregarded and disallowed in its

1  
2 entirety for the reasons stated in the Objection, namely that the contingency upon which the  
3 claim is predicated has not occurred and even if it had, there is no basis for the relief sought.

4 Debtor further gives notice that this motion is subject to B.L.R. 9014-1(b)(3), which  
5 provides:

- 6 (i) That Bankruptcy Local Rule 9014-1 of the United States Bankruptcy Court for the  
7 Northern District of California prescribes the procedures to be followed and that  
8 any objection to the requested relief, or a request for hearing on the matter, must  
9 be filed with the Bankruptcy Court located at 280 S. First Street, Room 3020, San  
10 Jose, California 95113 and serve upon counsel for the Debtor, Robert G. Harris,  
11 Esq., Binder & Malter LLP, 2775 Park Avenue, Santa Clara, California 95050,  
12 within 21 days of the mailing of this Notice;
- 13 (ii) That a request for hearing of objection must be accompanied by any declarations  
14 or memoranda of law the party objecting or requesting wishes to present in  
15 support of its position;
- 16 (iii) That if there is not a timely objection to the requested relief or request for hearing,  
17 the Court may enter an order granting relief by default; and
- 18 (iv) That the Debtor will give at least 7 days written notice of hearing to the objecting  
19 or requesting party, and to any trustee or committee appointed in the case, in the  
20 event an objection or request for hearing is timely made.

21 The Debtor further gives notice that pursuant to B.L.R. 3007-1, where a factual dispute is  
22 involved, the initial hearing on an objection to claim is deemed a status conference at which the  
23 court will not receive evidence. Where the objection involves only a matter of law, the matter  
24 may be argued at the initial hearing. The Debtor reserves the right to object to the claims on  
25 additional grounds.

26 Dated: February 4, 2015

BINDER & MALTER, LLP

By: /s/ Robert G. Harris

Robert G. Harris

Attorneys for Debtor and Debtor-in-Possession  
TECHNOLOGY PROPERTIES LIMITED LLC