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

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In re

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TECHNOLOGY PROPERTIES LIMITED, LLC,

Case No. 13-51589 SLJ

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Debtor.

Chapter 11

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JOINDER BY NIKON CORPORATION
IN (I) FUJITSU'S RESERVATION OF
RIGHTS AND OBJECTION TO
DISCLOSURE STATEMENT FOR
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' PLAN OF
REORGANIZATION, AND
(II) MOTION FOR APPOINTMENT OF
§ 1102(a)(2) COMMITTEE AND
RELATED RELIEF FOR LICENSEE
DEFENDERS

Date: January 23, 2014
Time: 10:00 a.m.
Place: Courtroom 3099
280 South First Street
San Jose, California

NIKON'S JOINDER IN FUJITSU'S
OBJECTION AND MOTION

1 Nikon Corporation (“Nikon”) is party to one or more patent license agreements with the
2 Debtor and is a party-in-interest similarly situated to Fujitsu Limited (“Fujitsu”), as described in
3 (i) *Fujitsu’s Reservation of Rights and Objection to Disclosure Statement for Official Committee*
4 *of Unsecured Creditors’ Plan of Reorganization* [Dkt. No. 378] (the “Licensee Objection”), and
5 (ii) *Motion for Appointment of § 1102(a)(2) Committee and Related Relief for Licensee Defenders*
6 [Dkt. No. 379] (the “Licensee Committee Motion”) (collectively, the “Licensee Filings”).¹

7 Nikon has various licenses, rights and defenses as to the Debtor and other relevant parties.
8 Nikon shares the concerns and objections expressed in the Licensee Filings. While each of the
9 Licensee Defenders referenced in the Licensee Filings has its own concerns regarding the threats
10 to various rights and defenses arising in connection with its respective licenses, Nikon believes
11 that the additional disclosure requested in the Licensee Objection is necessary and appropriate.
12 Accordingly, Nikon joins in Fujitsu’s request for such additional disclosure and hereby objects to
13 the Committee Disclosure Statement as failing to provide adequate information.

14 Nikon also shares the view expressed in the Licensee Committee Motion that it is
15 necessary and appropriate for this Court to appoint a Licensee Defender Committee to represent
16 the settlement licensees in this Chapter 11 case. As the OCC Plan evidences, licensees cannot
17 rely on any other constituency for adequate representation. Such a committee would be a cost-
18 effective solution to problems common to the licensees and could constructively contribute to this
19 case, including by proposing an alternative plan of reorganization to better address the needs of
20 all constituents.²

21 Accordingly, for the foregoing reasons and others that may be further addressed, Nikon:

22 (1) joins in the relief requested in the Licensee Objection and Licensee Committee
23 Motion; and

25 ¹ Capitalized terms used herein but not otherwise defined shall have the meanings given
26 them in the Licensee Objection or the Licensee Committee Motion, as applicable.

27 ² Nikon desires peace without being further harmed by the Debtor’s estate or the
28 Committee. It is clear that a better plan is needed in order to achieve that goal and to reduce the
need for further litigation.

1 (2) reserves all of its other rights and defenses, including the right to seek such other
2 and further relief as may be just and proper under the circumstances.

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Dated: January 16, 2014

MORRISON & FOERSTER LLP

By: /s/ G. Larry Engel
G. Larry Engel
Kristin A. Hiensch

Attorneys for Nikon Corporation