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7 Attorneys for Official
Committee of Unsecured Creditors

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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: March 26, 2014
) Time: 2:00 p.m.
16 Debtor.) 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 MARCH 26, 2014**

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

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

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

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

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1 3. On March 28, 2013, the Office of the United States Trustee appointed the Official
2 Committee of Unsecured Creditors (the "Committee") in this case, pursuant to 11 U.S.C. § 1102.

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

8 5. On January 13, 2014, the Committee filed the MOTION FOR ORDER GRANTING LEAVE,
9 STANDING AND AUTHORITY TO COMMENCE AND PROSECUTE CLAIMS OF THE DEBTOR'S ESTATE
10 [Docket No. 360] (the "Derivative Standing Motion") and together with the Trustee Motion, the
11 "Committee Motions").

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

15 7. Also on February 14, 2014, the Debtor filed the DISCLOSURE STATEMENT RE:
16 TPL PLAN OF REORGANIZATION (FEBRUARY 14, 2014) [Docket No. 437] (the "Debtor's Disclosure
17 Statement," and together with the Trustee Motion, the Derivative Standing Motion and the
18 Committee Disclosure Statement, the "March 26 Matters").

19 8. Each of the March 26 Matters are presently set for hearing before the Court on March
20 26, 2014. The Committee, with the Debtor's consent, intends to appear before the Court on such
21 date to request a continuance of the hearing on the March 26 Matters to **April 29, 2014, at 2:00 p.m.**
22 **PDT.**

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

25 Dated: March 21, 2014

DORSEY & WHITNEY, LLP

26 By: /s/ Thomas T. Hwang

27 Thomas T. Hwang

Attorneys for the

28 Official Unsecured Creditors Committee

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13 **TECHNOLOGY PROPERTIES LIMITED LLC,**) Case No. 13-51589-SLJ-11
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fka TECHNOLOGY PROPERTIES LIMITED,)
15 **A CALIFORNIA CORPORATION,**) Date: March 26, 2014
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16 Debtor.) Place: United States Bankruptcy Court
) 280 S. First Street, Room 3099
17) San Jose, CA 95113
) Judge: Honorable Stephen L. Johnson

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19 **CERTIFICATE OF SERVICE**

20 STATE OF CALIFORNIA)
) ss.
21 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 March 21, 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 MARCH 26, 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

Counsel for Debtor and
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6 Office of the U.S. Trustee/SJ
USTPRegion17.SJ.ECF@usdj.gov;
7 ltroxas@hotmail.com

8 **Request For Special Notice**

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Counsel for Sony Corporation
Sedgwick LLP
Lillian Stenfeldt, Esq.
E-mail: lillian.stenfeldt@sedgwicklaw.com

27 ///

28 ///

1 This Certificate was executed on March 21, 2014 at Palo Alto, Santa Clara County,
2 California. I declare under penalty of perjury that the foregoing is true and correct.

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4 /s/ Cecilia Cavazos

5 CECILIA CAVAZOS
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