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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,
13 LLC, A CALIFORNIA LIMITED LIABILITY
COMPANY,

14 Debtor.

Case No.: 13-51589-SLJ-11

Creditor Charles H. Moore's Notice of
Hearing on His Supporting Motion
To Appoint Chapter 11 Trustee and To
Remove Debtor In Possession

Chapter 11

Date: January 23, 2014
Time: 2:00 p.m.
Place: Courtroom 3099
280 South First Street
San Jose, California

20
21 **NOTICE OF HEARING ON CREDITOR CHARLES H. MOORE'S SUPPORTING MOTION**
22 **(TO THE CREDITOR'S COMMITTEE MOTION) FOR ORDER**
23 **APPOINTING CHAPTER 11 TRUSTEE AND REMOVING DEBTOR IN POSSESSION**

24 To: The Debtor, The United States Trustee, The Official Committee of Unsecured Creditors,
25 Secured Creditors and Other Parties In Interest:

26 NOTICE IS HEREBY GIVEN of the following:

27 1. On March 20, 2013, (the "Petition Date") Technology Properties Limited LLC
28 (the "Debtor") commenced the above-entitled Chapter 11 bankruptcy case by filing a Voluntary

1 Petition in this Court.

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

4 3. On March 28, 2013, the Office of The United States Trustee appointed the
5 Official Committee of Unsecured Creditors (the "Committee") in this case, pursuant to 11
6 U.S.C. Sec. 1102.

7 4. On December 16, 2013, the Committee filed the Motion Of Creditors'
8 Committee For Orders: (1) Directing the Appointment of a Chapter 11 Trustee; and (2)
9 Directing The Debtor and Daniel E. Leckrone To Appear and Show Cause Why They Should
10 Not Be Held In Contempt of Court For Violation of this Court's Order [Docket 313] (the
11 "Motion"). The Committee's Motion requests that that the Court enter an order (a) appointing a
12 chapter 11 trustee in this case and (b) directing the Debtor and its responsible individual Daniel
13 E. Leckrone to appear and show cause why they should not be held in contempt of court for
14 their illegal and detrimental conduct in this case.

15 5. On December 27, 2013, Creditor Charles H. Moore ("Moving Party Moore")
16 filed his "Supporting Motion (To The Creditor's Committee Motion) for Order Appointing
17 Chapter 11 Trustee and Removing Debtor In Possession" ("Creditor Moore's Motion").
18 Creditor Moore's Motion supports and joins in the Committee's Motion for an Order Directing
19 the Appointment of a Chapter 11 Trustee (Part (1) of Paragraph 4 above).

20 6. Creditor Moore's Motion is based upon this Notice, on the "Declaration of
21 Charles H. Moore In Support of His Supporting Motion To Appoint Chapter 11 Trustee"
22 submitted herewith; on his memorandum of points and authorities in support of motion
23 submitted herewith; in his request for judicial notice in support of motion submitted herewith;
24 on the pleadings and papers on file herein; on such reply papers as may be filed subsequently;
25 and on such oral and documentary evidence and argument as may be presented at the time of
26 the hearing.

27 7. A hearing to consider approval of the Committee's Motion, and of Creditor
28 Moore's Motion, will be held on **January 23, 2014, at 2:00 p.m. (Pacific Standard Time)**

1 before the Honorable Stephen L. Johnson, United States Bankruptcy Judge, United States
2 Courthouse and Federal Building, 280 South First Street, Room 3099, San Jose, CA 95113.

3 8. Pursuant to 9014-1(c)(1) of the Bankruptcy Local Rules for the Northern
4 District of California, the deadline for serving and filing of written objections to Creditor
5 Moore's Motion is fourteen (14) days in advance of the hearing (January 9, 2014), and the
6 deadline for serving and filing of written replies to any such objections is seven (7) days in
7 advance of the hearing (January 16, 2014).

8 9. Creditors and parties in interest with questions or who desire copies of Creditor
9 Moore's Motion may contact counsel for Creditor Moore at the contact information provided at
10 the top of the first page of this notice.

11 Dated: December 27, 2013

12 CHILES and PROCHNOW, LLP

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14 By: s/Kenneth H. Prochnow
15 Kenneth H. Prochnow
16 Attorneys for Creditor Charles H. Moore

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