

HEINZ BINDER, ESQ., ID #96533  
ROBERT G. HARRIS, ESQ., ID #124678  
Binder & Malter, LLP  
2775 PARK AVENUE  
Santa Clara, California 95050  
Telephone: (408) 295-1700  
Facsimile: (408) 295-1531  
Email: [Heinz@bindermalter.com](mailto:Heinz@bindermalter.com)  
Email: [Rob@bindermalter.com](mailto:Rob@bindermalter.com)

Attorneys for Reorganized Debtor  
Technology Properties Limited, LLC

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In re

TECHNOLOGY PROPERTIES LIMITED,  
LLC,

Debtor.

Case No: 13-51589 SLJ

Chapter 11

Date: September 21, 2016

Time: 2:00 p.m.

Place: Courtroom 3099  
280 South First Street  
San Jose, California

**NOTICE OF HEARING ON MOTION FOR RELIEF FROM DEFAULT  
ON ORDER RE REQUEST OF MICHAEL DAVIS FOR PAYMENT OF  
ADMINISTRATIVE EXPENSE (FRCP 60(b); FRBP 9024)**

TO MICHAEL DAVIS AND HIS COUNSEL OF RECORD:

PLEASE TAKE NOTICE that at the date, time and place set forth above Reorganized Debtor Technology Properties Limited ("TPL") a hearing will be held on TPL's Motion For Relief From Default On Order Re Request Of Michael Davis For Payment Of Administrative Expense (FRCP 60(b); FRBP 9024)(the "Motion").

TPL seek relief from the default asserted under the Motion on the ground that the payment of the full \$75,000 commission owed to Mr. Davis 12 days late was the result of excusable neglect from which the Court should relieve it by modifying its Order, specifically,

1 misconstrued statements from a competing creditor and misleading statements about a  
2 consensual extension made by the opposing party. Based on the foregoing, TPL seeks to have  
3 the Order set aside, in part, and the parties restored to their original positions so as to prevent the  
assertion of a plan default by the smallest administrative claimant and likely conversion of this  
heavily negotiated case to Chapter 7.

4 PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Local Rule 9014-  
5 1(c)(1) “[a]ny opposition shall be filed and served on the initiating party at least 14 days prior to the  
actual scheduled hearing date.

6 The Motion is based on this Notice, the Motion, the Declaration of Swamy Venkidu in  
7 support of the Motion, and a supporting Memorandum of Points and Authorities. Copies of these  
pleadings may be obtained by contacting the undersigned.

8 Date: August 22, 2016

BINDER & MALTER, LLP

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10 By: /s/ Robert G. Harris  
Robert G. Harris

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12 Attorneys for Reorganized Debtor  
Technology Properties Limited, LLC  
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