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

11
12 In re
13 TECHNOLOGY PROPERTIES LIMITED,
14 LLC,
15 Debtor.

Case No. 13-51589-SLJ-11

Chapter 11

**HEWLETT-PACKARD COMPANY'S
LIMITED OBJECTION AND
RESERVATION OF RIGHTS WITH
RESPECT TO THE JOINT DISCLOSURE
STATEMENT**

16 Date: October 14, 2014
17 Time: 2:00 p.m.
18 Place: United States Bankruptcy Court
19 Courtroom 3099
20 280 South First Street
21 San Jose, California

22 Hewlett-Packard Company ("HP") hereby files this limited objection and
23 reservation of rights with respect to the *Disclosure Statement re: Joint Plan of*
24 *Reorganization by Official Committee of Unsecured Creditors and Debtor* dated September
25 4, 2014 ("Disclosure Statement") [Docket No. 538]. HP respectfully states as follows:

26 1. HP entered into a non-exclusive patent license with TPL under the
27 Moore Microprocessor Portfolio (the "MMP Portfolio") on or about January 16, 2006 (as the
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1 same has been amended or modified, the “HP License”). HP is also a litigant against TPL in
2 a case pending in front of the United States District Court for the Northern District of
3 California with respect to the CORE Flash Portfolio.¹

4 2. HP seeks to preserve all of its rights, claims, defenses, and interests in
5 connection with the HP License. Under section 1125(a) of the Bankruptcy Code, HP is
6 entitled to full and fair disclosure of the treatment of the HP license under the Plan.

7 3. HP has participated in ongoing discussions with counsel to the Debtor
8 and Committee to protect HP’s defenses and rights as a licensee. The Joint Plan of
9 Reorganization by Official Committee of Unsecured Creditors and Debtor dated September
10 4, 2014 (“Joint Plan”) contains many protections for the licensees found in section XVI of
11 the Joint Plan. However, the disclosure statement contains no discussion or reference to the
12 section XVI of the Joint Plan. HP requests that the protections found in section XVI of the
13 Joint Plan be described in the Disclosure Statement.

14 4. The Disclosure Statement contemplates that “Licensee Objectors” will
15 receive certain benefits under the Joint Plan. HP is not currently listed a Licensee Objector.
16 The Joint Plan provides that a licensee may become a Licensee Objector by giving notice any
17 time prior to the commencement of the confirmation hearing. HP hereby provides notice of
18 its intention to be a Licensee Objector under the Joint Plan.

19 5. HP has contacted counsel for the Debtor and Committee regarding this
20 limited objection and believes that the Debtor and the Committee will be willing to address
21 HP’s requested additional disclosures.

22 6. Nothing in this Limited Objection shall constitute a waiver of any of
23 the rights, interests and remedies that may be available to HP pursuant to the Bankruptcy

24 ¹ HP is filing this limited objection to protect its rights as a licensee. HP does not consent to jurisdiction of the
25 Bankruptcy Court with respect to any patent litigation. This Limited Objection shall not be deemed or construed to
26 be a waiver of the rights of HP under applicable law or in equity, including but not limited to, the right (i) to have
27 final orders entered only after de novo review by a district judge in applicable matters, (ii) to trial by jury in any
28 proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (iii) to have the
District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to
assert or exercise any other rights, claims, actions, defenses, setoffs or recoupments to which HP is or may be
entitled, all of which are expressly reserved.

1 Code and applicable law, and all such rights, interests and remedies are hereby expressly
2 reserved. HP explicitly reserves the right to object to the Joint Plan and any confirmation
3 order.

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5 Dated: October 1, 2014

Respectfully submitted,

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By: /s/ Stefanie A. Elkins

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Stefanie A. Elkins

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Attorneys for Hewlett-Packard Company

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Case No. 13-51589-SLJ-11
Chapter 11
CERTIFICATE OF SERVICE

1 **CERTIFICATE OF SERVICE**

2 I, Stefanie Elkins, hereby declare:

3 I am over the age of 18 years and not a party to or interested in the within
4 entitled cause. I am an employee of Friedman & Springwater LLP and my business address
is 33 New Montgomery Street, Suite 290, San Francisco, California 94105.

5 On October 1, 2014, at my place of business as listed above, I served a true
6 and correct copy of the following document(s):

7 **HEWLETT-PACKARD COMPANY’S LIMITED OBJECTION AND**
8 **RESERVATION OF RIGHTS WITH RESPECT TO THE**
9 **JOINT DISCLOSURE STATEMENT**

10 in the manner indicated below:

11 **By Electronic Filing** said document(s) and transmission of the Notification of
12 Electronic Filing by the Clerk to a Registered Participant(s), addressed as follows:

13 **UNITED STATES TRUSTEE**
14 Office of the U.S. Trustee
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22 **REQUEST FOR SPECIAL NOTICEbro**

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23 I declare under penalty of perjury, under the laws of the United States of
24 America that the foregoing is true and correct, and that this declaration was executed at San
25 Francisco, California on October 1, 2014.

26 */s/ Stefanie Elkins*
27 Stefanie Elkins