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Attorneys For Creditor Charles H. Moore

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

In Re:

TECHNOLOGY PROPERTIES LIMITED,  
LLC, f/k/a TECHNOLOGY PROPERTIES  
LIMITED, INC., a California corporation, f/k/a  
TECHNOLOGY PROPERTIES LIMITED, a  
California corporation,

Debtor.

Case No.: 13-51589-SLJ-11

Chapter 11

Date: November 12, 2014

Time: 10:00 a.m.

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

Honorable Stephen L. Johnson

**CREDITOR CHARLES H. MOORE'S OBJECTION TO THE DISCLOSURE STATEMENT RE: JOINT  
PLAN OF REORGANIZATION BY OFFICIAL COMMITTEE OF UNSECURED CREDITORS AND  
DEBTOR DATED OCTOBER 29, 2014**

Creditor Moore believes that the time for objection to the competing disclosure  
statements has passed; it is now time to get out the vote.

However, one aspect of the Joint Disclosure Statement dated October 29, 2014 requires  
supplementation or explanation (and thus requires this objection), if for no other reason than to  
put the two plans and disclosure statements on relatively even footing.

As always, Creditor Moore was unaware that most of the *Fast Logic* litigation was the  
subject of mediation and about to be settled; we must read about it in the papers. Creditor  
Moore's own disclosure statement reflected the status quo of two weeks ago; that is, objections  
from two of the *Fast Logic* defendants centering on claims that the *Markman* determination in

1 that case was so adverse to Plaintiff TPL's position that the inevitable loss in the case would  
2 carry with it a seven-figure prevailing party attorney's fee award against Debtor TPL and its  
3 presumably asset-less co-defendant, Leckrone entity HSN.

4 Now, the Joint Disclosure statement informs us, at page 12 and following pages, that  
5 two of the four *Fast Logic* defendants just settled with TPL following mediation, and that  
6 defendant Sandisk might be next in line to reach a resolution.

7 This being a Leckrone-related matter, all of the terms and conditions of the settlement  
8 are deemed "confidential" and are unavailable to this Court, to Creditor Moore or to the other  
9 TPL creditors.

10 Creditor Moore submits that in light of the attention and emphasis previously afforded  
11 the *Fast Logic* litigation in both sides' disclosure statements, and giving due respect to  
12 confidentiality, at a minimum the Debtor and Committee should reveal the following:

- 13 1. Will receipt of the *Fast Logic* settlement proceeds have a material effect on the Joint  
14 Plan waterfall, i.e., will TPL creditors be paid sooner than under current Plan  
15 projections because of these settlements?
- 16 2. Has Debtor TPL recovered more, or less, in settlement proceeds than it spent in  
17 costs in the *Fast Logic* litigation?
- 18 3. How much was Mr. Leckrone's company Alliacense paid for its litigation support in  
19 the now-concluded *Fast Logic* cases?

20 These three questions can be answered without breaching any confidentiality agreement  
21 or diminishing TPL's negotiation or litigation posture as to the remaining two cases (Sandisk  
22 and Micron). The answers are necessary to permit TPL's creditors to be adequately informed  
23 about past, present and future TPL litigation under the Leckrone/Venkidu regime, and to allow  
24 adjustment of the Moore MMP Disclosure statement to reflect this latest development.

25 Dated: November 5, 2014

CHILES and PROCHNOW, LLP

26 By: s/Kenneth H. Prochnow  
27 Kenneth H. Prochnow  
28 Attorneys for Creditor Charles H. Moore