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8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION  
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12 In Re:

13 TECHNOLOGY PROPERTIES LIMITED,  
LLC, f/k/a TECHNOLOGY PROPERTIES  
14 LIMITED, INC., a California corporation,  
f/k/a TECHNOLOGY PROPERTIES  
15 LIMITED, a California corporation,  
16 Debtor.

Case No.: 13-51589-SLJ-11

Chapter 11

Date: August 21, 2014

Time: 3:00 p.m.

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

Honorable Stephen L. Johnson

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21 **CREDITOR CHARLES H. MOORE'S OBJECTION TO**  
22 **STIPULATED EX PARTE APPLICATION TO MODIFY DEADLINES**

23 On July 18, 2014, the Committee of Unsecured Creditors ("Creditor Committee") and  
24 the debtor, Technology Properties Limited, LLC (debtor "TPL") were ordered by this court to  
25 file a joint plan and disclosure statement by August 8, 2014. The August 8<sup>th</sup> deadline passed  
26 with no joint plan or disclosure statement filed. On August 11, 2014, Creditor Charles H.  
27 Moore (Creditor "Moore") filed his objection to debtor's failure to comply with this court's  
28 prior order to file a joint plan and disclosure statement on or before August 8, 2014. Today,

CREDITOR C. MOORE'S OBJECTION TO STIPULATION -1-

In Re: Technology Properties Limited, LLC, etc.; Case No. 13-51589-SLJ-11

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1 almost two weeks later, the debtor and Creditor Committee filed "Stipulated Ex Parte  
2 Application to Modify Deadlines to File Plan and Disclosure Statement" (the "Stipulation") for  
3 the court's approval.

4 Creditor Moore reaffirms his objection and further objects to the Stipulation on the  
5 grounds that the continuance will result in unconscionable delay and is prejudicial to the  
6 interests of creditors as a whole. The court should hold debtor to its representations and  
7 promises.

8 In seeking an order approving an extension, the debtor and the Creditor Committee have  
9 failed to show good cause (or any cause at all) as to why this court should grant an extension.  
10 Creditor Moore requests that the court deny the extension of time and issue an order to show  
11 cause why a chapter 11 trustee should not be appointed in light of (a) the debtor's repeated and  
12 continuing failure to present an acceptable reorganization plan and disclosure statement, and  
13 (b) the debtor's violations of this court's order directing that such a plan and disclosure  
14 statement be submitted.

15 Dated: August 19, 2014

CHILES and PROCHNOW, LLP

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17 By: s/Kenneth H. Prochnow  
Kenneth H. Prochnow  
18 Attorneys for Creditor Charles H. Moore  
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