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14
15 **UNITED STATES BANKRUPTCY COURT**
16
17 **NORTHERN DISTRICT OF CALIFONRIA**
18
19 **SAN JOSE DIVISION**
20

21 In re:

22 TECHNOLOGY PROPERTIES LIMITED,
23 LLC, a California limited liability company,
24
25 Debtor.
26

27 Case No.: 13- 51589SLJ

28 Chapter 11

Date: August 21, 2014
Time: 3:00 p.m.
Place: Courtroom 3099
280 South First Street
San Jose, California

29
30 **STIPULATED EX PARTE APPLICATION TO MODIFY DEADLINES**
31 **TO FILE PLAN AND DISCLOSURE STATEMENT**
32

33 Debtor and debtor in possession Technology Properties Limited LLC ("TPL"), Daniel
34 E. Leckrone ("Leckrone"), on behalf of TPL, as an individual, and as TPL's sole member, and
35 the Committee of Unsecured Creditors (the "Committee") of In re Technology Properties
36

1 Limited LLC hereby apply to the Court for an order modifying this Court's July 18, 2014
2 scheduling order with respect to the filing of a plan and disclosure statement herein and
3 setting a new hearing date as set forth below.

4
5 TPL respectfully represents as follows in support of this Stipulated Ex Parte
6 Application:

- 7 1. The instant Chapter 11 case was filed on March 20, 2013.
- 8
9 2. Throughout 2014, TPL and the Committee each filed and were prosecuting
10 competing plans of reorganization. On July 18, 2014, TPL, Leckrone and
11 the Committee executed a binding term sheet ("Term Sheet") that set forth
12 the essential terms of a joint TPL-Committee plan.
- 13
14 3. The Term Sheet contains a requirement for confirmation of the joint plan
15 within 45 days of its execution. At the July 18, 2014 status conference this
16 Court created an accelerated schedule to accommodate the time frame. The
17 Court ordered the parties to file their joint plan by August 8, 2014, and
18 shortened time for a hearing on approval of the disclosure statement
19 thereon to August 21, 2014.
- 20
21 4. TPL, Leckrone, and the Committee have been working diligently to
22 finalize the joint plan and have exchanged numerous drafts but could not
23 meet the August 8th deadline. The parties believe that they will be able to
24 file the joint plan by August 20, 2014.
- 25
26
27

1 5. On August 18, 2014, TPL, Leckrone, and the Committee executed an
2 Amendment to Term Sheet extending the deadline for confirmation for 45
3 days from August 18, 2014.

4
5 6. TPL and the Committee expect to file their joint disclosure statement not
6 later than August 29, 2014.

7 WHEREFORE, TPL, Leckrone, and the Committee respectfully request that this
8 Court (a) modify its July 18, 2014 order (b) set August 29, 2014, as the deadline for TPL
9 and the Committee to file their joint disclosure statement, (c) set a date in September 2014
10 to be determined by the court for a disclosure hearing, (d) set a date in September 2014 to
11 be determined by the court, for deadlines for any objections to the joint disclosure
12 statement, and (e) shorten the deadline for notice of the disclosure hearing and deadline for
13 objections as required to permit the filings and hearing as requested.

14
15 Dated: August 18, 2014

BINDER & MALTER, LLP

16
17 By: /s/ Roya Shakoori
18 Roya Shakoori
19 Attorneys for Debtor and Debtor-in-Possession
20 TECHNOLOGY PROPERTIES LIMITED LLC

21
22 **THE EXTENSION OF DEADLINES ABOVE IS STIPULATED**

23 Dated: August 18, 2014

DORSEY & WHITNEY, LLP

24 By: /s/ Robert A. Franklin
25 Robert A. Franklin
26 Attorneys for the Committee of Unsecured
27 Creditors of In re Technology Properties Limited
28 LLC

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Attorneys for Debtor and Debtor-in-Possession
TECHNOLOGY PROPERTIES LIMITED, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, DIVISION 5

In re

TECHNOLOGY PROPERTIES LIMITED,
LLC, a California limited liability company,

Debtor.

Case No: 13-51589 SLJ

Chapter 11

Date: August 21, 2014

Time: 3:00 p.m.

Place: Courtroom 3099
280 South First Street
San Jose, CA 95113

CERTIFICATE OF SERVICE

I, Natalie D. Gonzalez, declare:

I am employed in the County of Santa Clara, California. I am over the age of eighteen (18) years and not a party to the within entitled cause; my business address is 2775 Park Avenue, Santa Clara, California 95050.

On August 18, 2014, I served a true and correct copy of the following document(s):

- 1. STIPULATED EX PARTE APPLICATION TO MODIFY DEADLINES TO FILE PLAN AND DISCLOSURE STATEMENT**
- 2. ORDER ON STIPULATED EX PARTE APPLICATION TO MODIFY**

via electronic transmission and/or the Court's CM/ECF notification system to the parties registered to receive notice as follows:

U.S. Trustee

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United States Trustee
Office of the U.S. Trustee
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San Jose, CA 95113
Email: john.wesolowski@usdoj.gov

Unsecured Creditors Committee Attorney

c/o John Walshe Murray, Esq.
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Special Notice

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Executed on August 18, 2014, at Santa Clara, California. I certify under penalty of perjury that the foregoing is true and correct.

/s/ Natalie D. Gonzalez
Natalie D. Gonzalez