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6 Attorneys for Cupertino City Center Buildings,  
a California Limited Partnership.  
7

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

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

Case No.: 13-51589-SLJ-11

Chapter 11

**STATEMENT OF POSITION REGARDING  
MOTION OF CREDITORS' COMMITTEE  
FOR ORDERS: DIRECTING THE  
APPOINTMENT OF A CHAPTER 11  
TRUSTEE**

Date: January 23, 2014

Time: 10:00 a.m.

Place United States Bankruptcy Court  
280 South First Street  
San Jose, California

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21 Secured Creditor Cupertino City Center ("CCC") hereby submits the following  
22 statement of position concerning the Creditors' Committee's Motion for Appointment of  
23 Chapter 11 Trustee ("Motion") [Dkt. 313].

24 CCC opposes the Motion on the grounds that it is premature and would potentially cause  
25 unnecessary delay of this proceeding. CCC believes the Debtor should be entitled to solicit  
26 votes in favor of its proposed plan of reorganization. CCC requests that the Court deny the  
27 Motion, or delay consideration of the Motion until after a confirmation hearing on the Debtor's  
28 plan.

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Dated: January 22, 2014

Respectfully Submitted,

SCHNADER HARRISON SEGAL & LEWIS LLP

By: /s/ Christopher H. Hart  
Christopher H. Hart  
Attorneys for Cupertino City Center Buildings, a  
California Limited Partnership

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11 In re:  
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13 Debtor.

Case No.: 13-51589-SLJ-11

Chapter 11

**CERTIFICATE OF SERVICE RE:  
STATEMENT OF POSITION REGARDING  
MOTION OF CREDITORS' COMMITTEE  
FOR ORDERS: DIRECTING THE  
APPOINTMENT OF A CHAPTER 11  
TRUSTEE**

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I, Celeste Alas, declare under penalty of perjury under the laws of the United States of America that the following is true and correct:

I am employed in the City and County of San Francisco, State of California, in the office of a member of the bar of this court, at whose direction the service was made. I am a resident of the United States, over the age of eighteen (18) years, and not a party to or interested in the within-entitled cause. My business address is SCHNADER HARRISON SEGAL & LEWIS LLP, 650 California Street, 19<sup>th</sup> Floor, San Francisco, California 94108.

I caused to be served the following document(s):

- **STATEMENT OF POSITION REGARDING MOTION OF CREDITORS' COMMITTEE FOR ORDERS: DIRECTING THE APPOINTMENT OF A CHAPTER 11 TRUSTEE**

I caused the above documents to be served by the following means:

- BY ECF.** Based on a court order or an agreement of the parties to accept service, transmission of the Notification of Electronic Filing by the Clerk to a Registered Participant who has consented to electronic service shall constitute effective service in accordance with BLR 9013-3(c) and 9022-1(b).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 22, 2014, at San Francisco, California.

/s/ Celeste Alas  
Celeste Alas