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12 Attorneys for Debtor and Debtor In
13 Possession Technology Properties Limited, LLC

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re:

TECHNOLOGY PROPERTIES LIMITED,
LLC, a California limited liability company

Debtor.

Case number 13- 51589SLJ

Chapter 11

Date: January 9, 2014

Time: 10:00 a.m.

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

FOURTH CHAPTER 11 STATUS CONFERENCE STATEMENT OF TPL

Debtor and debtor in possession Technology Properties Limited LLC ("TPL") hereby
submits its Status Conference Statement.

I. Compliance with Reporting Requirements

1. TPL has filed its report on Official Form 26 to comply with its obligations as to
PDS.

1
2 2. TPL is current with the filing of its Monthly Operating Report (“MOR”). The last
3 MOR filed was for November 2013.

4 **II. Chapter 11 Plan and Disclosure Statement**

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6 1. After the Official Committee of Unsecured Creditors (“OCC”) indicated it
7 would not agree to further extension of exclusivity and sought termination of exclusivity, on
8 October 31, 2013 TPL filed its Plan of Reorganization (October 31, 2013) along with Disclosure
9 Statement Re: TPL Plan of Reorganization (October 31, 2013). After several hearings and
10 amended Plans and Disclosure Statements having been filed by TPL, TPL is prepared to proceed
11 with the TPL Plan of Reorganization (December 23, 2013) and Disclosure Statement Re: TPL
12 Plan of Reorganization (December 23, 2013) (the “TPL Disclosure Statement”). The TPL
13 Disclosure Statement hearing is set for January 23, 2014.

14 2. Likewise, the OCC filed its Official Committee of Unsecured Creditors’ Plan of
15 Reorganization (Dated December 17, 2013) and Disclosure Statement For Official Committee of
16 Unsecured Creditors’ Plan of Reorganization (Dated December 17, 2013) (the “OCC Disclosure
17 Statement”). The OCC Disclosure Statement hearing is set for January 23, 2014.

18
19 January 16, 2014 is the deadline for parties wishing to object to the Plan and Disclosure
20 Statement.

21 **III. Motion to Appoint Trustee**

22 1. On December 16, 2013, the OCC filed the Motion of Creditors’ Committee For
23 Orders (1) Directing the Appointment of a Chapter 11 Trustee; and (2) Directing the Debtor and
24 Daniel E. Leckrone to Appear and Show Cause Why They Should Not Be Held in Contempt of
25 Court for Violation of This Court’s Order (“Motion to Appoint Trustee”). The OCC Motion to
26 Appoint Trustee is also set for hearing on January 23, 2014. The deadline for serving and filing
27

1 of written objections is fourteen (14) days in advance of the hearing (January 9, 2014), and the
2 deadline for serving and filing of written replies to any such objections is seven (7) days in advance
3 of the hearing (January 16, 2014).
4

5 2. On December 27, 2013, Creditor Charles H. Moore filed its Supporting Motion (To
6 The Creditor's Committee Motion) For Order Appointing Chapter 11 Trustee And Removing
7 Debtor In Possession ("Moore Motion"). Notwithstanding the untimeliness of the filing, Charles
8 H. Moore ("Moore") chose to set the Moore Motion for hearing on January 23, 2014 without
9 first obtaining an order of this court. TPL vigorously opposes the ignoring of the code and
10 deadlines by Moore.
11

12 **Conclusion**

13 TPL requests a continuance of the status conference for approximately ninety days.

14 Dated: January 2, 2014

BINDER & MALTER, LLP

16 By: /s/

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18 Attorneys for Debtor and Debtor-in-possession
TECHNOLOGY PROPERTIES LIMITED LLC
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, DIVISION 5

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TECHNOLOGY PROPERTIES LIMITED,
LLC,

Debtor.

Case No: 13-51589 SLJ

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280 South First Street
San Jose, California

CERTIFICATE OF SERVICE

I, Tam Tran, 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 January 2, 2014, I served a true and correct copy of the following document(s):

FOURTH CHAPTER 11 STATUS CONFERENCE STATEMENT OF TPL

via electronic transmission and 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

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c/o Robert Franklin, Esq.
c/o Thomas Hwang, Esq.
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Special Notice

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1 Executed on January 2, 2014, at Santa Clara, California. I certify under penalty of
2 perjury that the foregoing is true and correct.

3 /s/ Tam Tran
4 Tam Tran
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