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8 Attorneys for Secured Creditor: Swamy Venkidu

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:
TECHNOLOGY PROPERTIES LIMITED,
LLC,
Debtor.

Case No.: 13-51589 SLJ
Chapter 11
Date: January 23, 2013
Time: 10:00 a.m.

**VENKIDU'S RESPONSE TO OFFICIAL UNSECURED CREDITOR'S COMMITTEE
MOTION TO APPOINT CHAPTER 11 TRUSTEE – REQUEST TO CONTINUE
HEARING**

Secured Creditor, Swamy Venkidu ("Venkidu"), as shareholder agent for a group of shareholders, files this statement in response to the Unsecured Creditor Committee's ("Committee") Motions to Appoint Trustee. Venkidu submits that the Request to Appoint a Trustee at this stage is premature, and that the hearing on the motion should be continued, for the reasons articulated below.

1. Chapter 11 Disclosure Statements and Plans have been filed by the Technology Properties, Limited ("TPL") and the Committee. Ballots and Confirmation Hearings on these Plans are expected within the next 45 to 90 days. A vote on the Plan either for the Debtor's Plan or the Committee's plan will render the issue as to the appointment of the

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Trustee moot.

- 2. The Committee has requested an Order of Examination of the Debtor and Alliacense; the results of this examination should provide evidence as to whether it would be appropriate to appoint a Chapter 11 trustee in this case.
- 3. Venkidu is concerned about the costs of this reorganization and the additional burden on the estate by the appointment of a Chapter 11 trustee.
- 4. Fujitsu and several other licensees have filed motions to appoint a Licensee Defender Committee, an appointment which will further complicate this case and burden it with additional professional fees.

Wherefore, Venkidu requests that the Court continue the hearing of the Motion to Appoint Trustee to a date which is the later of: a) The date ballots are received on the proposed Chapter 11 Plans, or b) The date on which the Rule 2004 examinations scheduled by the Committee are concluded.

Respectfully Submitted,

Dated: January 20, 2014

/s/ Javed I. Ellahie
Javed I. Ellahie
Attorney for Swamy Venkidu

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:
TECHNOLOGY PROPERTIES LIMITED,
LLC,
Debtor.

Case No.: 13-51589 SLJ
Chapter 11
Date: May 9, 2013
Time: 10:00 a.m.

I, the undersigned, declare that I am a citizen/permanent resident of the United States over the age of 18 years, employed in the County of Santa Clara, and not a party to the within action. My business address is 12 South First Street, Suite 600, San Jose, CA 95113. On the date set forth below, I served the within:

**VENKIDU'S RESPONSE TO OFFICIAL UNSECURED CREDITOR'S COMMITTEE
MOTION TO APPOINT CHAPTER 11 TRUSTEE**

though the courts Electronic Filing System ("ECF") to:

Heinz Binder on behalf of Debtor Technology Properties Limited LLC
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Gateway, Inc.
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Peter C. Califano on behalf of Requestor Alliacense Limited LLC
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Gregory J. Charles on behalf of Requestor Patriot Scientific Corp.
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5 Roya Shakoori on behalf of Debtor Technology Properties Limited LLC
6 roya@bindermalter.com

7 Wendy W. Smith on behalf of Debtor Technology Properties Limited LLC
8 Wendy@bindermalter.com

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

10 Executed on the date set forth below at San Jose, California.

11 Dated: January 20, 2014

/s/ Javed Ellahie
Javed Ellahie

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