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SNELL & WILMER L.L.P.
Alan L. Sullivan (3152)
Todd M. Shaughnessy (6651)
Amy F. Sorenson (8947)
15 West South Temple, Suite 1200
Salt Lake City, Utah 84101-1004
Telephone: (801) 257-1900
Facsimile: (801) 257-1800

CRAVATH, SWAINE & MOORE LLP
Evan R. Chesler (admitted pro hac vice)
David R. Marriott (7572)
Worldwide Plaza
825 Eighth Avenue
New York, New York 10019
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Attorneys for Defendant/Counterclaim-Plaintiff
International Business Machines Corporation

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC.,	**DECLARATION OF MIKE ANDERSON**
Plaintiff/Counterclaim-Defendant,	Civil No. 2:03CV-0294 DAK
v.	Honorable Dale A. Kimball
INTERNATIONAL BUSINESS MACHINES CORPORATION,	Magistrate Judge Brooke C. Wells
Defendant/Counterclaim-Plaintiff.	

I, Mike Anderson, declare as follows:

1. I am currently employed by International Business Machines Corporation ("IBM") as a Software Engineer in IBM's Linux Technology Center ("LTC"). I have worked for IBM since 1999.

2. This declaration is submitted in connection with the lawsuit brought by The SCO Group, Inc. ("SCO") against IBM, titled The SCO Group, Inc. v. International Business Machines Corporation, Civil No. 2:03CV-0294 DAK (D. Utah 2003). I make this declaration based upon personal knowledge.

3. I understand that SCO has alleged in Item 189 of its Final Disclosures that I disclosed "Dynix/ptx MPIO technology" to Linux and in Item 190 that I disclosed "Dynix/ptx device driver impementation [sic] techniques" to Linux.

4. All of the contributions that I have made to Linux in the areas of MPIO and device drivers were original to IBM. None of them included any Unix System V material. None of them was a modification or derivative work of Unix System V. None of them was based on System V. And none of them was written with reference to System V.

5. All of my Linux contributions were based on my own creativity and general experience. The contributions that I made to Linux in the area of MPIO were for a different architecture than Dynix/ptx supported and were all based on general MPIO knowledge available in the public literature.

6. One example of this public literature is R. L. Cormier, R. J. Dugan and R. R. Guyette article "System/370 Extended Architecture: The Channel Subsystem" in the May 1983

edition of the IBM Journal of Research and Development. This article is available from

http://www.research.ibm.com/journal/rd/273/ibmrd2703C.pdf

7.   I understand that SCO alleges that I made Linux contributions to the following

files in connection with MPIO:

            include/linux/raid/multipath.h
            drivers/md/multipath.c

I have never made any contributions to these files.

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

Executed: September 13, 2006.

Beaverton, Oregon

                                     Mike Anderson