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*Attorneys for Defendant/Counterclaim-Plaintiff  
International Business Machines Corporation*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF UTAH**

THE SCO GROUP, INC.,

Plaintiff/Counterclaim-Defendant,

v.

INTERNATIONAL BUSINESS MACHINES  
CORPORATION,

Defendant/Counterclaim-Plaintiff.

**DECLARATION OF ULRICH DREPPER**

Civil No. 2:03CV-0294 DAK

Honorable Dale A. Kimball

Magistrate Judge Brooke C. Wells

I, Ulrich Drepper, declare as follows:

1. I am currently employed by Red Hat, Inc. as a Consulting Engineer. As a Consulting Engineer, I create, edit, and supervise the development of Linux source code.

Additionally, I have been since 1995 the maintainer of the GNU libc (“glibc”) library, which is used to run dynamically linked ELF binaries.

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. During the period of 1997-1998, I participated in a project called 86Open, whose purpose was to create a standard Application Binary Interface (ABI) for Unix-like operating systems on the x86 Intel hardware platform. The Santa Cruz Operation (“Santa Cruz”) was an active participant in this project and hosted the only meeting at its Santa Cruz office.

4. By August 1997 Linux had implemented the TIS Committee ELF format as its programming and binary interface.

5. The Linux operating system was represented in 86Open by Linus Torvalds, Caldera Systems, Inc., and myself, among others. I observed Santa Cruz actively encourage representatives of other operating systems (including Linux) to use the Linux ELF ABI. Santa Cruz’s creation of lxrund and its advocacy for the Linux ELF implementation resulted in Linux ELF’s adoption as the 86Open binary standard and as the *de facto* binary standard for Linux and all other x86 Unix-like operating systems.

6. In 1999, Intel assembled representatives of the most important parties involved with Unix on the new Intel IA-64 hardware platform. The purpose of this collaboration

was to create the IA-64 ABI, and in the course of events to also revise the ELF standard, by then enshrined in a document called "gABI". I was one of the two representatives of Linux involved in the project, and I worked alongside Intel, HP, Sun, SGI, IBM, and Santa Cruz in developing modifications to the ELF binary format.

7. The gABI ELF standard document itself was edited by Santa Cruz's David Prosser, and I worked closely with him in creating some of the material that was incorporated into ELF as part of this process.

8. In the course of my work on the ELF binary format, I have observed SCO and its predecessors encourage the use of ELF in Linux.

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

Executed: 9/19/2006

Location: Los Gatos, CA



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ULRICH DREPPER