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Attorneys for The SCO Group, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC.,	SCO'S RESPONSE TO IBM'S
	SEVENTH SET OF
Plaintiff/Counterclaim-Defendant,	INTERROGATORIES
v.	
INTERNATIONAL BUSINESS	Case No. 2:03CV0294DAK
MACHINES CORPORATION,	Honorable Dale A. Kimball
	Magistrate Judge Brooke C. Wells
Defendant/Counterclaim-Plaintiff.	

Plaintiff/Counterclaim Defendant, The SCO Group, Inc., ("SCO"), hereby responds and objects to Defendant/Counterclaim Plaintiff, International Business Machine Corporation's ("IBM") Seventh Set of Interrogatories as follows:

GENERAL OBJECTIONS

SCO hereby incorporates by reference all of the General Objections set forth in SCO's prior Responses to IBM's Interrogatories (the "General Objections"). Each of the General Objections is incorporated by reference into each of the responses set forth below, which responses SCO now makes without waiver of the General Objections or specific objections to the following Interrogatories.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 23:

Regarding SCO's Final Disclosure of Allegedly Misused Material, dated December 22, 2005, please state with specificity – separately with respect to each version, file and line of code, method and concept identified by SCO:

(a)   by whom it has been, and currently is owned, when, and from whom it was acquired;

(b)   whether is appears in Linux and, in particular, the Linux kernel and, if so, which version(s) of Linux, and which files and lines of such version(s);

(c)   whether it was included in UnitedLinux 1.0 and distributed by SCO as part of its Linux offerings and, if so, when and to whom;

(d)   whether it was made available over the internet by SCO and, if so, when and to whom;

(e)   whether it is included in Sun's Open Solaris product and, if so, which version(s) of Open Solaris, and which files and lines of such version(s); and

(f)   whether it is included in, dictated by or related to any standards, and, if so, which ones and as of when.

RESPONSE TO INTERROGATORY NO. 23

In addition to its General Objections, SCO specifically objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, seeks information that is irrelevant and not reasonably calculated to lead to admissible evidence, and calls for information that is exclusively

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a matter of expert testimony. SCO also objects to this Interrogatory on the grounds that the

phrase "dictated by or related to any standards" as used in this Interrogatory is vague, ambiguous

and unintelligible. SCO further objects to this topic on the ground that it seeks information that

is in the possession, custody and control of IBM or third parties from whom IBM could seek

such information. In particular, SCO objects to subpart (e) of this Interrogatory as it requires

SCO to provide information from third party, Sun's Open Solaris product. SCO also objects to

subpart (c) of this Interrogatory based on confidentiality of customer information. SCO also

notes that IBM withdrew subpart (b). Subject to, as limited by, and without waiving the

foregoing general and specific objections, SCO answers with the following informational chart:

Item No.	23(a) Owner	23(a) (cont'd) Acquired	23(c) In UnitedLinux 1.0	23(d) SCO website	23(f) "Standards"
1	IBM*	N/A	yes	As part of SCO Linux before discontinuance	None
2	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
3	IBM*	Sequent	not presently determined	not presently determined	None
4	IBM*	Sequent	not presently determined	not presently determined	None
5	IBM*	Sequent	not presently determined	not presently determined	None
6	IBM*	Sequent	not presently determined	not presently determined	None
7	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
8	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None

9	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
10	IBM*	Sequent	not presently determined	not presently determined	None
11	IBM*	Sequent	not presently determined	not presently determined	None
12	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
13	IBM*	Sequent	not presently determined	not presently determined	None
14	IBM*	Sequent	not presently determined	not presently determined	None
15	IBM*	Sequent	not presently determined	not presently determined	None
16	IBM*	Sequent	not presently determined	not presently determined	None
17	IBM*	Sequent	not presently determined	not presently determined	None
18	IBM*	Sequent	not presently determined	not presently determined	None
19	IBM*	Sequent	not presently determined	not presently determined	None
20	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
21	IBM*	Sequent	not presently determined	not presently determined	None
22	IBM*	Sequent	not presently determined	not presently determined	None
23	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
24	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
25	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
26	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
27	IBM*	Sequent	not presently determined	not presently determined	None
28	IBM*	Sequent	not presently determined	not presently determined	None

29	IBM*	Sequent	not presently determined	not presently determined	None
30	IBM*	Sequent	not presently determined	not presently determined	None
31	IBM*	Sequent	not presently determined	not presently determined	None
32	IBM*	Sequent	not presently determined	not presently determined	None
33	IBM*	Sequent	not presently determined	not presently determined	None
34	IBM*	Sequent	not presently determined	not presently determined	None
35	IBM*	Sequent	not presently determined	not presently determined	None
36	IBM*	Sequent	not presently determined	not presently determined	None
37	IBM*	Sequent	not presently determined	not presently determined	None
38	SCO	AT&T/USL/Novell	no	no	None
39	IBM*	Sequent	no	not presently determined	None
40	IBM*	Sequent	not presently determined	not presently determined	None
41	IBM*	Sequent	not presently determined	not presently determined	None
42	IBM*	Sequent	not presently determined	not presently determined	None
43	IBM*	Sequent	not presently determined	not presently determined	None
44	IBM*	Sequent	not presently determined	not presently determined	None
45	IBM*	Sequent	not presently determined	not presently determined	None
46	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
47	IBM*	Sequent	not presently determined	not presently determined	None
48	IBM*	Sequent	not presently determined	not presently determined	None
49	IBM*	Sequent	not presently determined	not presently determined	None
50	IBM*	Sequent	not presently determined	not presently determined	None
51	IBM*	Sequent	not presently determined	not presently determined	None

52	IBM*	Sequent	not presently determined	not presently determined	None
53	IBM*	Sequent	not presently determined	not presently determined	None
54	IBM*	Sequent	not presently determined	not presently determined	None
55	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
56	IBM*	Sequent	not presently determined	not presently determined	None
57	IBM*	Sequent	not presently determined	not presently determined	None
58	IBM*	Sequent	not presently determined	not presently determined	None
59	IBM*	Sequent	not presently determined	not presently determined	None
60	IBM*	Sequent	not presently determined	not presently determined	None
61	IBM*	Sequent	not presently determined	not presently determined	None
62	IBM*	Sequent	not presently determined	not presently determined	None
63	IBM*	Sequent	no	not presently determined	None
64	IBM*	Sequent	not presently determined	not presently determined	None
65	IBM*	Sequent	not presently determined	not presently determined	None
66	IBM*	Sequent	not presently determined	not presently determined	None
67	IBM*	Sequent	not presently determined	not presently determined	None
68	IBM*	Sequent	not presently determined	not presently determined	None
69	IBM*	Sequent	not presently determined	not presently determined	None
70	IBM*	Sequent	not presently determined	not presently determined	None
71	IBM*	Sequent	not presently determined	not presently determined	None
72	IBM*	Sequent	not presently determined	not presently determined	None
73	IBM*	Sequent	not presently determined	not presently determined	None
74	IBM*	Sequent	not presently determined	not presently determined	None

75	IBM*	Sequent	not presently determined	not presently determined	None
76	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
77	IBM*	Sequent	not presently determined	not presently determined	None
78	IBM*	Sequent	not presently determined	not presently determined	None
79	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
80	IBM*	Sequent	not presently determined	not presently determined	None
81	IBM*	Sequent	not presently determined	not presently determined	None
82	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
83	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
84	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
85	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
86	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
87	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
88	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
89	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
90	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
91	IBM*	Sequent	not presently determined	not presently determined	None
92	IBM*	Sequent	not presently determined	not presently determined	None

93	IBM*	Sequent	not presently determined	not presently determined	None
94	IBM*	Sequent	not presently determined	not presently determined	None
95	IBM*	Sequent	not presently determined	not presently determined	None
96	IBM*	Sequent	not presently determined	not presently determined	None
97	IBM*	Sequent	not presently determined	not presently determined	None
98	IBM*	Sequent	not presently determined	not presently determined	None
99	IBM*	Sequent	not presently determined	not presently determined	None
100	IBM*	Sequent	not presently determined	not presently determined	None
101	IBM*	Sequent	not presently determined	not presently determined	None
102	IBM*	Sequent	not presently determined	not presently determined	None
103	IBM*	Sequent	not presently determined	not presently determined	None
104	IBM*	Sequent	not presently determined	not presently determined	None
105	IBM*	Sequent	not presently determined	not presently determined	None
106	IBM*	Sequent	not presently determined	not presently determined	None
107	IBM*	Sequent	not presently determined	not presently determined	None
108	IBM*	Sequent	not presently determined	not presently determined	None
109	IBM*	Sequent	not presently determined	not presently determined	None
110	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
111	IBM*	Sequent	not presently determined	not presently determined	None
112	SCO	AT&T/USL/Novell	not presently determined	no	None
113-143	IBM*	Sequent	not presently determined	not presently determined	None
144	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None

145	IBM*	Sequent	not presently determined	not presently determined	None
146	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
147	IBM*	Sequent	not presently determined	not presently determined	None
148	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
149	SCO	AT&T/USL/Novell	not presently determined	not presently determined	not presently determined
150	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
151	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
152	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards", but related to latest POSIX versions, XPG since v4.2
153	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
154	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
155	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
156	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
157	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards", but related to latest POSIX versions, XPG since v4.2

158	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
159	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
160	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
161	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
162	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
163	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
164	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
165	SCO	AT&T/USL/Novell	not presently determined	not presently determined	No standards; related to interfaces included in SVID, since 1980s.
166	SCO	AT&T/USL/Novell	not presently determined	not presently determined	No standards; related to interfaces included in SVID, since 1980s.
167	SCO	AT&T/USL/Novell	yes	no	None
168	SCO	AT&T/USL/Novell	no	not presently determined	None
169	SCO	AT&T/USL/Novell	not presently determined	Yes: generally readable but copyrighted by SCO on each page	None
170	SCO	AT&T/USL/Novell	yes	no	None
171	SCO	AT&T/USL/Novell	not presently determined	Yes: generally readable but copyrighted by SCO on each page	None

172	SCO	AT&T/USL/Novell	not presently determined	Yes: generally readable but copyrighted by SCO on each page	None
173	SCO	AT&T/USL/Novell	not presently determined	Yes: generally readable but copyrighted by SCO on each page	None
174	SCO	AT&T/USL/Novell	no	not presently determined	None
175	SCO	AT&T/SUN	no	no	not presently determined
176	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	None
177	SCO	AT&T/SUN	not presently determined	not presently determined	None
178	IBM*	N/A	not presently determined	not presently determined	None
179	IBM*	Sequent	not presently determined	not presently determined	None
181	IBM*	Sequent	not presently determined	not presently determined	None
182	IBM*	Sequent	not presently determined	not presently determined	None
183	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards", but related to all XPGs, the C standards, the POSIX standards
184	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards", but related to all XPGs, the C standards, the POSIX standards
185	SCO	AT&T/USL/Novell	not presently determined	no	None
186	IBM*	Sequent	not presently determined	not presently determined	None
187	IBM*	Sequent	not presently determined	not presently determined	None

188	IBM*	Sequent	not presently determined	not presently determined	None
189	IBM*	Sequent	not presently determined	not presently determined	None
190	IBM*	Sequent	not presently determined	not presently determined	None
191	IBM*	Sequent	not presently determined	not presently determined	None
192	IBM*	Sequent	not presently determined	not presently determined	None
193	IBM*	Sequent	not presently determined	not presently determined	None
194	SCO	AT&T/USL/Novell	no	no	No standards. In SVID 3rd edition and all System V ABIs.
195	SCO	AT&T/USL/Novell	no	no	No standards. In SVID 3rd edition.
196	SCO	AT&T/USL/Novell	no	no	Dispute whether the following are "standards", but related to the latest POSIX, XPG2 and on
197	SCO	AT&T/USL/Novell	not presently determined	not presently determined	None+F145
198	SCO	AT&T/USL/Novell	no	no	None
199	SCO	AT&T/USL/Novell	no	no	None
200	not presently determined	not presently determined	not presently determined	not presently determined	not presently determined
201	SCO	AT&T/USL/Novell	no	Yes: password protected to licensees	None
202	SCO	AT&T/USL/Novell	not presently determined	not presently determined	not presently determined
204	IBM*	Sequent	not presently determined	not presently determined	None
205	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards", but related to

					UNIX 98 and on
206	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards", but related to latest POSIX versions, XPG since v5
207	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions, XPG since v4.2
208	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs
209	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v2
210	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v2

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211	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
212	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v2
213	SCO	AT&T/USL/Novell	not presently determined	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
214	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v2
215	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
216	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and

					all XPGs since v4.2
217	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
218	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
219	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
220	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
221	SCO	AT&T/USL/Novell	not presently determined	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v2

222	SCO	AT&T/USL/Novell	not presently determined	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v2
223	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
224	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
225	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
226	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v3
227	SCO	AT&T/USL	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and

					all XPGs since v3
228	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to POSIX.1
229	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
230	SCO	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs since v4.2
231	SCO .	AT&T/USL/Novell	yes	Yes: password protected to licensees	Dispute whether the following are "standards": but related to latest POSIX versions and all XPGs
232	IBM*	Sequent	not presently determined	not presently determined	none
233	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	none
234	IBM*	Sequent	not presently determined	not presently determined	none
235	IBM*	Sequent	not presently determined	not presently determined	none
236	IBM*	Sequent	not presently determined	not presently determined	none

237	IBM*	Sequent	not presently determined	not presently determined	none
238	IBM*	Sequent	not presently determined	not presently determined	none
239	IBM*	Sequent	not presently determined	not presently determined	none
240	IBM*	Sequent	not presently determined	not presently determined	none
241	IBM*	Sequent	not presently determined	not presently determined	none
242	IBM*	Sequent	no	not presently determined	none
243	IBM*	Sequent	no	not presently determined	none
244	IBM*	Sequent	not presently determined	not presently determined	none
245	IBM*	Sequent	no	not presently determined	none
246	IBM*	Sequent	not presently determined	not presently determined	none
247	IBM*	Sequent	not presently determined	not presently determined	none
248	IBM*	Sequent	not presently determined	not presently determined	none
249	IBM*	Sequent	not presently determined	not presently determined	none
250	IBM*	Sequent	not presently determined	not presently determined	none
251	IBM*	Sequent	not presently determined	not presently determined	none
252	IBM*	Sequent	not presently determined	not presently determined	none
253	IBM*	Sequent	not presently determined	not presently determined	none
254	IBM*	Sequent	not presently determined	not presently determined	none
255	IBM*	Sequent	not presently determined	not presently determined	none
256	IBM*	Sequent	not presently determined	not presently determined	none
257	IBM*	Sequent	not presently determined	not presently determined	none
258	IBM*	Sequent	not presently determined	not presently determined	none
259	IBM*	Sequent	not presently determined	not presently determined	none

260	IBM*	Sequent	not presently determined	not presently determined	none
261	IBM*	Sequent	not presently determined	not presently determined	none
262	IBM*	Sequent	not presently determined	not presently determined	none
263	IBM*	Sequent	not presently determined	not presently determined	none
264	IBM*	Sequent	not presently determined	not presently determined	none
265	IBM*	Sequent	not presently determined	not presently determined	none
266	IBM*	Sequent	not presently determined	not presently determined	none
267	IBM*	Sequent	not presently determined	not presently determined	none
268	IBM*	Sequent	not presently determined	not presently determined	none
269	IBM*	Sequent	not presently determined	not presently determined	none
270	IBM*	Sequent	not presently determined	not presently determined	none
271	IBM*	Sequent	not presently determined	not presently determined	none
272	SCO	AT&T/USL/Novell	yes for elf.h; no for remainder	Elf.h, elftypes.h, and SVR4.2-es-mp-libelf.h: password protected to Licensees; remainder have not been available	None
273	SCO	AT&T/USL/Novell	not presently determined	Yes: generally readable but copyrighted by SCO on each page	None
274	SCO	AT&T/USL/Novell	not presently determined	not presently determined	None
275	SCO	AT&T/USL/Novell	not presently determined	not presently determined	None
276	SCO	AT&T/USL/Novell	not presently determined	not presently determined	None
277	SCO	AT&T/USL/Novell	not presently determined	not presently determined	None
278	SCO	AT&T/USL/Novell	not presently determined	not presently determined	None

279	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	none
280	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	none
281	IBM*	Sequent	not presently determined	not presently determined	none
282	IBM*	Sequent	not presently determined	not presently determined	none
283	IBM*	Sequent	not presently determined	not presently determined	none
284	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	none
285	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	none
286	IBM*	Sequent	not presently determined	not presently determined	none
287	IBM*	Sequent	yes	As part of SCO Linux before discontinuance	none
288	IBM*	Sequent	not presently determined	not presently determined	none
289	IBM*	N/A	not presently determined	not presently determined	none
290	IBM*	Sequent	not presently determined	not presently determined	none
291	IBM*	Sequent	not presently determined	not presently determined	none
292	IBM*	Sequent	not presently determined	not presently determined	none
293	IBM*	Sequent	not presently determined	not presently determined	None

* IBM owns the property subject to the restrictions on disclosure and use contained within the agreements with ATT, now held by SCO.

INTERROGATORY NO. 25:

For each IBM request for admission to which SCO's response is anything other than an unqualified admission, state the following: (a) why the proposition is denied or is not an unqualified admission and (b) the respects, if any, in which the proposition is true.

RESPONSE TO INTERROGATORY NO. 25

SCO interprets Federal Rule of Civil Procedure 36 to require a party responding to a request for admission to provide the detail requested in this Interrogatory. Accordingly, SCO incorporates by reference its responses to IBM's Requests for Admissions, due May 1, 2006.

DATED this 7th day of April, 2006.

Respectfully submitted,

HATCH, JAMES & DODGE, P.C.
Brent O. Hatch
Mark F. James

BOIES, SCHILLER & FLEXNER LLP
Robert Silver
Stuart H. Singer
Stephen N. Zack
Edward Normand

By_____

Counsel for The SCO Group, Inc.