

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
The SCO GROUP, INC., <u>et al.</u> , ¹)	Case No. 07-11337 (KG)
)	(Jointly Administered)
Debtors.)	

Objection Deadline: TBD
Hearing Date: TBD

**DEBTORS' OBJECTION TO CLAIM
OF SNOW, CHRISTENSEN & MARTINEAU**

Debtors, The SCO Group, Inc. and SCO Operations, Inc. object to the allowance of the claim filed by Snow, Christensen & Martineau (“Snow Christensen”) claim #184 (“Snow Christensen Claim”), a copy of which is attached hereto as Exhibit A, against the estate of SCO Group, Inc. for the reasons that follow:

Introduction

1. On September 14, 2007 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
2. This Court has jurisdiction over this Objection under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding per 28 U.S.C. § 157(b)(2)(B).

Background

3. On March 24, 2008, Snow Christensen filed a proof of claim, #67 (“Claim No. 1”), on the basis of stock ownership. The Debtors objected to, and the Court disallowed, Claim No. 1, by entry of the *Order Granting and Sustaining Debtors’ First (Non-Substantive) Omnibus Objection to Claims* [D.E. #620] on November 24, 2008.

¹ The Debtors and the last four digits of each of the Debtors’ federal tax identification numbers are as follows: (a) The SCO Group, Inc., a Delaware corporation, Fed. Tax ID. #2823; and (b) SCO Operations, Inc., a Delaware corporation, Fed. Tax ID. #7393.

4. On May 2, 2008, Snow Christensen filed the Snow Christensen Claim. The Snow Christensen Claim states that it amends Claim No. 1. As in Claim No. 1, the Snow Christensen Claim is filed on the basis that it is an equity security holder.

5. The Snow Christensen Claim improperly asserts a claim of ownership of stock and, therefore, the Snow Christensen Claim should likewise be disallowed. Moreover, the disallowance of Claim #1, based on the same issue, is law of the case.

Relief Requested

6. By this Objection, the Debtors seek entry of an order pursuant to section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure disallowing the Snow Christensen Claim.

Applicable Authority

6. Code Section 502(b) provided in pertinent part that:

The court, after notice and a hearing, shall determine the amount of [a] claim in lawful currency of the United States as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that ... such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.

11 U.S.C. § 502(b)(1).

7. For the reasons set forth above, the Debtors submit that, pursuant to Code Section 502(b)(1) and Bankruptcy Rule 3007, the Court should disallow the Snow Christensen Claim.

Notice

8. Notice of this Objection has been given to the following parties, or in lieu thereof, to their counsel, if known: (i) the Office of the United States Trustee; (ii) parties requesting notice under Bankruptcy Rule 2002; and (iii) Snow Christensen & Martineau, 10 Exchange Place, Eleventh Floor, Salt Lake City, UT 84111. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

9. No prior objection has been made to this or any other court.

Compliance with Delaware Bankruptcy Local Rule 3007-1

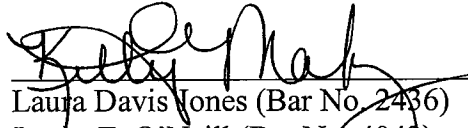
10. This Objection complies with the requirements of Del. Bank. L R 3007.

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WHEREFORE, Debtor SCO Group, Inc. respectfully requests that the Court enter an order (i) disallowing the Snow Christensen Claim and (ii) granting it such other and further relief as is just and proper.

Dated: July 16, 2009

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