

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

-----  
In re : Chapter 11  
: :  
The SCO GROUP, INC., *et al.*,<sup>1</sup> : Case No. 07-11337 (KG)  
: (Jointly Administered)  
Debtors. : :  
: **Hearing Date: 4/20/2010 at 4:00 p.m. (ET)**  
: **Objection Deadline: 4/13/2010 at 4:00 p.m. (ET)**  
-----

**NOTICE OF MOTION OF THE CHAPTER 11 TRUSTEE FOR ORDER UNDER  
11 U.S.C. §§ 105(a) AND 363 AND FED. R. BANKR. 2002 AND 6004  
(A) APPROVING THE SALE OF THE IP ASSET FREE AND CLEAR OF ALL LIENS,  
CLAIMS, INTERESTS, AND ENCUMBRANCES PURSUANT  
TO 11 U.S.C. § 363 AND (B) GRANTING RELATED RELIEF**

TO: Parties required to receive notice pursuant to Del. Bankr. L.R. 2002-1.

PLEASE TAKE NOTICE that on March 29, 2010, Edward N. Cahn, Chapter 11 Trustee for the above-captioned debtors filed the MOTION OF THE CHAPTER 11 TRUSTEE FOR ORDER UNDER 11 U.S.C. §§ 105(a) AND 363 AND FED. R. BANKR. 2002 AND 6004 (A) APPROVING THE SALE OF THE IP ASSET FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363 AND (B) GRANTING RELATED RELIEF (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court"). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that the Motion seeks approval of the sale of The SCO Group, Inc.'s ("SCO") asset, "The SCO Group, Inc. – Perk Up," which includes United States Patent Number 6,931,544, Method and Apparatus for Executing Multiple JAVA™ Applications on a Single JAVA™ Virtual Machine, together with any patents and patents issuing from applications claiming priority to such patents (the "IP Asset") to Liberty Lane, LLC ("Liberty Lane") pursuant to the terms and conditions of the certain Patent Assignment by and between SCO and Liberty Lane, a copy of which is attached to the Motion as Exhibit B.

PLEASE TAKE FURTHER NOTICE that any party wishing to submit a competing offer for the IP Asset must submit a non-contingent offer and evidence of financial wherewithal to close on the transaction on or before April 19, 2010 at 4:00 p.m. (prevailing Eastern Time) to: (i) The SCO Group, Inc., 333 South 520 West, Suite 170, Lindon, Utah 84042, Attn: Ryan Tibbitts; (ii) Blank Rome LLP, 1201 N. Market Street, Suite 800, Wilmington, DE 19801, Attn: Bonnie

---

<sup>1</sup> 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.

Glantz Fatell, Esq.; (iii) Ocean Park Advisors, LLP, 6033 West Century Blvd. Suite 1290, Los Angeles, CA 90045, Attn: Mark Fisler.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed with the Bankruptcy Court in accordance with the local rules and served upon the undersigned counsel on or before **April 13, 2010 at 4:00 p.m.** prevailing Eastern Time.

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE KEVIN GROSS AT THE BANKRUPTCY COURT ON **APRIL 20, 2010 AT 4:00 P.M. (EST)**.

Dated: March 29, 2010  
Wilmington, Delaware

Respectfully submitted,

**BLANK ROME LLP**

/s/ Bonnie Glantz Fatell  
Bonnie Glantz Fatell (No. 3809)  
1201 Market Street, Suite 800  
Wilmington, DE 19801  
Telephone: (302) 425-6400  
Facsimile: (302) 425-6464

Counsel for Edward N. Cahn, Chapter 11 Trustee