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## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC., by and through the Chapter 11 Trustee in Bankruptcy, Edward N. Cahn,

Plaintiff/Counterclaim-Defendant,

VS.

INTERNATIONAL BUSINESS MACHINES CORPORATION,

Defendant/Counterclaim-Plaintiff.

THE SCO GROUP, INC.'S MOTION TO REOPEN THE CASE

Civil No.: 2:03CV0294

Honorable Tena Campbell

Pursuant to the Court's Order dated September 10, 2010 (Docket No. 1093),

Plaintiff/Counterclaim-Defendant, The SCO Group, Inc. ("SCO"), respectfully moves the Court
to reopen this case in order to proceed with SCO's unfair competition claim concerning the

Project Monterey joint venture and with SCO's tortious interference claims alleging that IBM
interfered with SCO's market and business relationships. The grounds for this Motion are
described in full in SCO's Memorandum in Support of Its Motion to Reopen the Case filed
concurrently herewith.

DATED this 4th day of November, 2011.

By: /s/ Brent O. Hatch HATCH, JAMES & DODGE, P.C. Brent O. Hatch Mark F. James

BOIES, SCHILLER & FLEXNER LLP David Boies Robert Silver Stuart H. Singer Edward Normand

Counsel for The SCO Group, Inc.

## **CERTIFICATE OF SERVICE**

I, Brent O. Hatch, hereby certify that on this 4th day of November, 2011, a true and correct copy of the foregoing **SCO's Motion to Reopen the Case** was filed with the Court and served via electronic mail to the following recipients:

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