

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re : Chapter 11  
:   
The TSG GROUP, INC., et al.,<sup>1</sup> : Case No. 07-11337 (KG)  
: (Jointly Administered)  
Debtors. :   
: **Hearing Date: August 28, 2012 at 10:00 a.m. ET**  
: **Objection Deadline: August 21, 2012 at 4:00 p.m. ET**

**NOTICE OF MOTION OF THE CHAPTER 11 TRUSTEE TO CONVERT CASES  
FROM CHAPTER 11 TO CHAPTER 7 OF THE BANKRUPTCY CODE**

TO: (I) the Office of the United States Trustee for the District of Delaware; and  
(II) those parties who have requested notice pursuant to Bankruptcy Rule  
2002 and Rule 2002-1(b) of the Local Rules

**PLEASE TAKE NOTICE** that on August 6, 2012, Edward N. Cahn, Esq. (the  
“**Chapter 11 Trustee**”), in his capacity as chapter 11 trustee for the above-captioned debtors  
(collectively, the “**Debtors**”), filed the *Motion of the Chapter 11 Trustee to Convert Cases from  
Chapter 11 to Chapter 7 of the Bankruptcy Code* (the “**Motion**”) with the United States  
Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware  
19801 (the “**Bankruptcy Court**”). A copy of the Motion is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the relief  
sought in the Motion must be filed with the Bankruptcy Court on or before **August 21, 2012 at  
4:00 p.m.**, prevailing Eastern time.

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a  
copy of the response or objection upon: (i) counsel to the Chapter 11 Trustee: Bonnie Glantz  
Fatell, Esq. and Stanley B. Tarr, Esq., Blank Rome LLP, 1201 N. Market Street, Suite 800,

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<sup>1</sup> The Debtors and the last four digits of each of the Debtors’ federal tax identification numbers are as follows: (a) The TSG Group, Inc. [f/k/a The SCO Group, Inc.], a Delaware corporation, Fed. Tax Id. #2823; and (b) TSG Operations, Inc. [f/k/a SCO Operations, Inc.], a Delaware corporation, Fed. Tax Id. #7393.

Wilmington, DE 19801; and (ii) the Office of the United States Trustee: Juliet Sarkessian, Esq., United States Trustee's Office, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF SOUGHT BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION WILL BE HELD ON AUGUST 28, 2012 AT 10:00 A.M. PREVAILING EASTERN TIME (THE "HEARING") BEFORE THE HONORABLE KEVIN GROSS, CHIEF UNITED STATES BANKRUPTCY JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, WILMINGTON, DELAWARE 19801.**

Dated: August 6, 2012

BLANK ROME LLP

*/s/ Stanley B. Tarr*

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Bonnie Glantz Fatell (DE No. 3809)

Stanley B. Tarr (DE No. 5535)

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Wilmington, DE 19801

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*Counsel for Edward N. Cahn, Chapter 11 Trustee*