

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

In re : Chapter 11  
:   
The TSG Group, Inc., *et al.*,<sup>1</sup> : Case No. 07-11337 (KG)  
:   
: (Jointly Administered)  
Debtors. :   
Re: Dkt. No. 1474

**CERTIFICATION OF COUNSEL REGARDING CHAPTER 7  
TRUSTEE'S MOTION FOR ENTRY OF AN ORDER AUTHORIZING  
ABANDONMENT, DISPOSAL, AND/OR DESTRUCTION OF PROPERTY  
AND PAYMENT OF RELATED EXPENSES**

The undersigned hereby certifies as follows:

1. On January 31, 2013, Edward N. Cahn, Esq., in his capacity as Chapter 7 Trustee for the above-captioned debtors (the "**Chapter 7 Trustee**"), filed the *Motion of the Chapter 7 Trustee for Entry of An Order Authorizing Abandonment, Disposal, and/or Destruction of Property and Payment of Related Expenses* [D.I. 1474] (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (this "**Court**").

2. The deadline to object or respond to the Motion was February 15, 2013 at 4:00 p.m. ET (the "**Objection Deadline**").

3. Prior to the Objection Deadline, counsel for the Chapter 7 Trustee received informal comments to the proposed order from the Office of the United States Trustee ("**OUST**"). No other comments or responses to the Motion were received.

4. The Chapter 7 Trustee has agreed to modify the proposed order as requested by the OUST to resolve the informal comments. Accordingly, the Chapter 7 Trustee hereby submits the revised *Order Authorizing Abandonment, Disposal, and/or Destruction of Property and*

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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) 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.

*Payment of Related Expenses* (the “**Revised Proposed Order**”) attached hereto as **Exhibit A**. A blackline comparison of the Revised Proposed Order marked to show changes from the form of order originally attached to the Motion is attached hereto as **Exhibit B**. The OUST has no objection to the entry of the Revised Proposed Order

WHEREFORE, the Chapter 7 Trustee respectfully requests that this Court enter the Revised Proposed Order.

Dated: February 20, 2013

**BLANK ROME LLP**

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