IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
The SCO GROUP, INC., et al.,	Case No. 07-11337 (KG) (Jointly Administered)
Debtors.	
	Hearing Date: June 12, 2009 at 2:00 p.m. (ET) Objection Deadline: June 1, 2009 at 4:00 p.m. (ET)

NOTICE OF MOTION TO CONVERT CASES TO CHAPTER 7

TO: All Creditors, Equity Security Holders and Parties Listed on the Attached Certificate of Service

PLEASE TAKE NOTICE THAT on May 11, 2009, International Business Machines Corporation ("IBM") filed its Motion of International Business Machines Corporation for an Order Converting the Debtors' Chapter 11 Bankruptcy Cases to Cases Under Chapter 7 of the Bankruptcy Code (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE THAT the Motion seeks the conversion of the above-captioned chapter 11 bankruptcy cases to cases under chapter 7 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE THAT if you wish to oppose the Motion, then on or before June 1, 2009 at 4:00 p.m. EST (the "Objection Deadline"), you must file a written objection with the Bankruptcy Court at the address shown below:

Clerk of the Court for the United States Bankruptcy Court for the District of Delaware 824 North Market Street, 3rd Floor Wilmington, Delaware 19801

PLEASE TAKE FURTHER NOTICE THAT any objection to the Motion must be in writing and served upon so as to be actually received by: (a) undersigned counsel to IBM and (b) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207 Wilmington, Delaware 19801, Attention: Joseph J. McMahon, Jr., Esquire, on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT if an objection is timely filed, served and received and such objection is not otherwise timely resolved, a hearing to consider such objection and the Motion will be held before The Honorable Kevin Gross at the Bankruptcy Court, 824 Market Street, 6th Floor, Courtroom 3, Wilmington, Delaware 19801 on June 12, 2009 at 2:00 p.m. (ET).

PLEASE TAKE FURTHER NOTICE that copies of the Motion are available: (1) for viewing at the Clerks' Office at 824 North Market Street, 3rd Floor, Wilmington, Delaware

19801; (2) on the Court's docket website at <u>www.deb.uscourts.gov</u>; or (3) by written request to undersigned counsel for IBM.

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

Dated: May 11, 2009

POTTER ANDERSON & CORROON LLP

By:

Laurie Selber Silverstein (No. 2396) Gabriel R. MacConaill (No. 4734)

Hercules Plaza

1313 North Market Street, 6th Floor

Wilmington, Delaware 19801

Phone: (302) 984-6000 Fax: (302) 658-1192

- and -

CRAVATH, SWAINE & MOORE LLP

Richard Levin David R. Marriott

Worldwide Plaza, 825 Eighth Avenue

New York, New York 10019

Phone: (212) 474-1000 Fax: (212) 474-3700

Of Counsel:

INTERNATIONAL BUSINESS MACHINES CORPORATION

Alec S. Berman 1133 Westchester Avenue White Plains, New York 10604 (914) 642-3000

Attorneys for Creditor
International Business Machines Corporation