

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
The SCO GROUP, INC., <u>et al.</u> , <sup>1</sup>	)	Case No. 07-11337 (KG)
	)	(Jointly Administered)
	)	
Debtors.	)	

**Objection Deadline: TBD**  
**Hearing Date: TBD**

**DEBTORS' OBJECTION TO CLAIM OF MARK J. LANGE**

Debtors, The SCO Group, Inc. and SCO Operations, Inc. object to the allowance of the claim filed by Mark J. Lange ("Lange") claim #183 ("Lange Claim"), a copy of which is attached hereto as Exhibit A, against the Debtors' estates for the reasons that follow:

**Introduction**

1. On September 14, 2007 (the "Petition Date"), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
2. This Court has jurisdiction over this Objection under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding per 28 U.S.C. § 157(b)(2)(B).

**Background**

3. On May 1, 2008, Lange filed the Lange Claim. As stated in the Lange Claim, Lange filed the claim on the basis that Lange is an equity security holder.
4. The Lange Claim improperly asserts a claim of ownership of stock. In addition, the Debtors dispute the Lange Claim because the Bar Date in this matter was April 21, 2008 and the Lange Claim was filed after the Bar Date.

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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 SCO Group, Inc., a Delaware corporation, Fed. Tax ID. #2823; and (b) SCO Operations, Inc., a Delaware corporation, Fed. Tax ID. #7393.

**Relief Requested**

5. By this Objection, the Debtors seek entry of an order pursuant to section 502(b) of the Bankruptcy Code and Rule 3007 of the Federal Rules of Bankruptcy Procedure disallowing the Lange Claim.

**Applicable Authority**

6. Code Section 502(b) provided in pertinent part that:

The court, after notice and a hearing, shall determine the amount of [a] claim in lawful currency of the United States as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that ... such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.

11 U.S.C. § 502(b)(1).

7. For the reasons set forth above, the Debtors submit that, pursuant to Code Section 502(b)(1) and Bankruptcy Rule 3007, the Court should disallow the Lange Claim.

**Notice**

8. Notice of this Objection has been given to the following parties, or in lieu thereof, to their counsel, if known: (i) the Office of the United States Trustee; (ii) parties requesting notice under Bankruptcy Rule 2002; and (iii) Mark J. Lange, 308 Water Street North, Northfield, MN 55057. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

**No Prior Request**

9. No prior objection has been made to this or any other court.

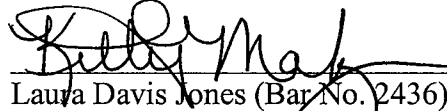
**Compliance with Delaware Bankruptcy Local Rule 3007-1**

10. This Objection complies with the requirements of Del.Bank.LR 3007.

WHEREFORE, the Debtors respectfully request that the Court enter an order (i) disallowing the Lange Claim and (ii) granting it such other and further relief as is just and proper.

Dated: July 16, 2009

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