

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

In re : Chapter 11
: :
The SCO GROUP, INC., *et al.*,¹ : Case No. 07-11337 (KG)
: (Jointly Administered)
Debtors. : :
: **Hearing Date: 3/15/2010 at 10:00 a.m. (ET)**
: **Objection Deadline: 3/8/2010 at 4:00 p.m. (ET)**

NOTICE OF MOTION OF THE CHAPTER 11 TRUSTEE FOR ORDER UNDER 11 U.S.C. §§ 105(a), 363, AND 365 AND FED. R. BANKR. P. 2002, 6004, 6006 AND 9014 (A) APPROVING THE SALE OF MOBILITY BUSINESS FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363, (B) AUTHORIZING AND APPROVING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS IN CONNECTION THEREWITH, AND (C) GRANTING RELATED RELIEF

TO: Parties required to receive notice pursuant to Del. Bankr. L.R. 2002-1.

PLEASE TAKE NOTICE that on February 26, 2010, Edward N. Cahn, Chapter 11 Trustee for the above-captioned debtors (collectively, the “Debtors”) filed the **MOTION OF THE CHAPTER 11 TRUSTEE FOR ORDER UNDER 11 U.S.C. §§ 105(a), 363, AND 365 AND FED. R. BANKR. P. 2002, 6004, 6006 AND 9014 (A) APPROVING THE SALE OF MOBILITY BUSINESS FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES PURSUANT TO 11 U.S.C. § 363, (B) AUTHORIZING AND APPROVING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS IN CONNECTION THEREWITH, AND (C) GRANTING RELATED RELIEF** (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

PLEASE TAKE FURTHER NOTICE that the Motion seeks approval of the sale of certain assets related to The SCO Group, Inc.’s (“SCO”) mobile productivity solutions and tools business to allow mobile devices to access corporate data (collectively, the “Mobility Business”) to Me Inc Holdings, LLC (“MIH”) pursuant to the terms and conditions of that certain Asset Purchase Agreement (the “APA”) by and between SCO, the Buyer and Darl McBride, a copy of which is attached to the Motion as Exhibit B.

PLEASE TAKE FURTHER NOTICE that any party wishing to submit a competing offer for the Mobility Business must submit a non-contingent offer, marked APA to show any revisions, and evidence of financial wherewithal to close on the transaction on or before March 11, 2010 at 4:00 p.m. (prevailing Eastern Time) to: (i) The SCO Group, Inc., 333 South 520 West, Suite. 170, Lindon, Utah 84042, Attn: Ryan Tibbitts; (ii) Blank Rome LLP, 1201 N. Market Street, Suite 800, Wilmington, DE

¹ 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.

19801, Attn: Bonnie Glantz Fatell, Esq.; (iii) Ocean Park Advisors, LLP, 6033 West Century Blvd. Suite 1290, Los Angeles, CA 90045, Attn: Mark Fisler.

PLEASE TAKE FURTHER NOTICE that, by the Motion, the Trustee seeks to potentially assume and assign the executory contracts listed on Schedule 2.1(a) to the APA. The Trustee will serve counterparties to such executory contracts with a notice of assumption and assignment and of the proposed cure amounts relating to such executory contracts (the "Assumption Notice") by March 1, 2010. The Trustee will attach to the Assumption Notice, the Debtors' calculation of the undisputed cure amounts which the Trustee believes must be paid to cure all prepetition defaults under all executory contracts (the "Cure Amount"). The Trustee requests that if a non-debtor party to any executory contract disputes the Cure Amount or objects to the assumption and/or assignment of an executory contracts that such party be required to file an objection (the "Cure Objection") on or before 4:00 p.m. (prevailing Eastern Time) on March 8, 2010 this Motion (the "Cure Objection Deadline") and to serve a copy of the Cure Amount Objection so as to be received no later than 4:00 p.m. (prevailing Eastern Time) on the same day, upon (i) The SCO Group, Inc., 333 South 520 West, Suite. 170, Lindon, Utah 84042, Attn: Ryan Tibbitts; (ii) Blank Rome LLP, 1201 N. Market Street, Suite 800, Wilmington, DE 19801, Attn: Bonnie Glantz Fatell, Esq.; (iii) Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801, Attn: Joseph J. McMahan, Jr., Esq.; and (iv) Holland & Hart LLP, 60 E. South Temple, Suite 2000, Salt Lake City, Utah 84111, Attn: Marc Porter (collectively, the "Notice Parties").

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed with the Bankruptcy Court in accordance with the local rules and served upon the undersigned counsel on or before **March 8, 2010 at 4:00 p.m.** prevailing Eastern Time.

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

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE KEVIN GROSS AT THE BANKRUPTCY COURT ON **MARCH 15, 2010 AT 10:00 A.M. (EST)**.

Dated: February 26, 2010
Wilmington, Delaware

Respectfully submitted,

BLANK ROME LLP

/s/ Bonnie Glantz Fatell
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