

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

In re : Chapter 11
:
TSG Group, Inc. (f/k/a The SCO Group, : Case No. 07-11337 (KG)
Inc.), *et al.*,¹ :
: (Jointly Administered)
Debtors. :

**CERTIFICATION OF COUNSEL REGARDING NOTICE OF INTENTION TO
ABANDON PROPERTY AND SETTING TIME FOR OBJECTION**

The undersigned hereby certifies as follows:

1. On July 29, 2011, Edward N. Cahn, in his capacity as Chapter 11 Trustee (the “Trustee”) for the above-captioned debtors (collectively, the “Debtors”), filed the *Notice of Intent to Abandon Property and Setting Time for Objection* [D.I. 1306] (the “Abandonment Notice”) with the United States Bankruptcy Court for the District of Delaware (this “Court”). The Abandonment Notice proposes to abandon the Debtors’ interest in the administrative fee associated with collection of certain “SVRX” software license royalties. The collection of such royalties, most of which royalties are remitted to Novell, Inc. (“Novell”), is of inconsequential value to the Debtors’ estates, too burdensome and costly to collect, and is of no benefit to the Debtors’ estates under the present circumstances.

2. The Notice of Abandonment was served on the parties (the “2002 Service List”) who have requested service pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”). *See* D.I. 1306 (Certificate of Service). Novell and its counsel were served with a copy of the Abandonment Notice. Service of the Abandonment Notice was made upon the 2002 Service List, rather than to all creditors as arguably required pursuant to

¹ 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.

Bankruptcy Rule 6007, because the cost of service thereon is cost-prohibitive and defeats the purpose of the proposed abandonment. The creditor matrix compiled by the Debtors since the commencement of these cases includes in excess of two thousand creditors, for whom service thereon would likely cost the Debtors' estates in excess of \$20,000.00.

3. The deadline to object or respond to the Abandonment Notice was August 12, 2011 at 4:00 p.m. ET (the "Objection Deadline"). The undersigned hereby certifies that, as of the Objection Deadline, he has received no written answer, objection or responsive papers to the Abandonment Notice. The undersigned further certifies that he has caused a review of the Court's docket in this case and no answer, objection or other responsive papers to the Abandonment Notice appears thereon.

4. Accordingly, the Trustee hereby seeks entry of an order in the form attached hereto as Exhibit "A" (the "Proposed Order"), granting the proposed abandonment and limiting notice of the same to those parties listed on the 2002 Service List.

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

Dated: August 12, 2011

BLANK ROME LLP

/s/ Stanley B. Tarr

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