## 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. : Objection Deadline: October 5, 2011 at 4:00 p.m. ET Hearing Date: October 17, 2011 at 10:30 a.m. ET

NOTICE OF APPLICATION OF THE CHAPTER 11 TRUSTEE TO APPROVE THE RETENTION AND EMPLOYMENT OF DBBMCKENNON AS ACCOUNTANTS TO AUDIT THE DEBTORS' 401(K) PLAN FOR THE YEAR ENDED DECEMBER 31, 2010 AND THEREAFTER IN ACCORDANCE WITH ERISA RULES AND REGULATIONS NUNC PRO TUNC TO SEPTEMBER 16, 2011

TO: (i) the Office of the United States Trustee; and (ii) all parties who have timely filed requests for Notice under Bankruptcy Rule 2002

Edward N. Cahn, Chapter 11 Trustee for the above-captioned debtors (collectively, the "Debtors") filed the attached Application of the Chapter 11 Trustee to Approve the Employment and Retention of dbbmckennon as Accountants to Audit the Debtors' 401(k) Plan for the Year Ended December 31, 2010 and Thereafter in Accordance with ERISA Rules and Regulations Nunc Pro Tunc to September 16, 2011 (the "Application") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court").<sup>2</sup>

133091.01600/22057556v.3

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<sup>&</sup>lt;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.

<sup>&</sup>lt;sup>2</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Application.

OBJECTIONS AND RESPONSES TO THE APPLICATION, IF ANY, MUST BE IN WRITING AND FILED WITH THE BANKRUPTCY COURT NO LATER THAN 4:00 P.M. PREVAILING EASTERN TIME ON OCTOBER 5, 2011.

Objections or other responses to the Application, if any, must also be served so that they are received not later than October 5, 2011, 4:00 p.m., prevailing Eastern time, by (a) counsel to the Trustee, Blank Rome LLP, 1201 Market Street, Suite 800, Wilmington, DE 19801, Attn: Bonnie Glantz Fatell, Esquire; and (b) the Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 N. King Street, Suite 2207, Lock Box 35, Wilmington, Delaware 19801, Attn: Juliet M. Sarkessian, Esquire.

IF OBJECTIONS OR RESPONSES ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE APPLICATION WILL BE HELD BEFORE THE HONORABLE KEVIN GROSS, UNITED STATES BANKRUPTCY COURT, 824 MARKET STREET, SIXTH FLOOR, COURTROOM 3, WILMINGTON, DELAWARE 19801 ON OCTOBER 17, 2011 AT 10:30 A.M. PREVAILING EASTERN TIME.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

## Dated: September 20, 2011 BLANK ROME LLP

/s/\_\_Stanley B. Tarr

Bonnie Glantz Fatell (No. 3809) Stanley B. Tarr (No. 5535) 1201 Market Street, Suite 800 Wilmington, DE 19801

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