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

NOTICE OF MOTION OF THE CHAPTER 11 TRUSTEE PURSUANT TO SECTIONS 105 AND 363(b)(1) OF THE BANKRUPTCY CODE FOR ORDER AUTHORIZING FURTHER EXPANSION OF SCOPE OF RETENTION OF KING & McCLEARY, LLC TO PERFORM CERTAIN TAX RETURN SERVICES

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 Motion of the Chapter 11 Trustee Pursuant to Sections 105 and 363(b)(1) of the Bankruptcy Code for an Order Authorizing Further Expansion of Scope of Retention of King & McCleary, LLC to Perform Certain Tax Return Services (the "Motion")<sup>2</sup> with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court").

OBJECTIONS AND RESPONSES TO THE MOTION, IF ANY, MUST BE IN WRITING AND FILED WITH THE BANKRUPTCY COURT NO LATER THAN 4:00 P.M. PREVAILING EASTERN TIME ON OCTOBER 10, 2011.

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 Motion.

Objections or other responses to the Motion, if any, must also be served so that they are received not later than October 10, 2011, 4:00 p.m., prevailing Eastern time, by (i) counsel to the Trustee: (a) 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.

IF OBJECTIONS OR RESPONSES ARE TIMELY FILED AND SERVED IN

ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION 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 4:00 P.M. PREVAILING EASTERN TIME.

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

Dated: September 30, 2011

**BLANK ROME LLP** 

/s/ Stanley B. Tarr
Bonnie Glantz Fatell (No. 3809)
Stanley B. Tarr (No. 5535)
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