SNELL & WILMER L.L.P.

Alan L. Sullivan (3152)

Todd M. Shaughnessy (6651)

Amy F. Sorenson (8947)

15 West South Temple, Suite 1200

Salt Lake City, Utah 84101-1004

Telephone: (801) 257-1900 Facsimile: (801) 257-1800

CRAVATH, SWAINE & MOORE LLP

Evan R. Chesler (admitted pro hac vice)

David R. Marriott (7572)

Worldwide Plaza 825 Eighth Avenue

New York, New York 10019

Telephone: (212) 474-1000 Facsimile: (212) 474-3700

Attorneys for Defendant/Counterclaim-Plaintiff International Business Machines Corporation

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC.,

Plaintiff/Counterclaim-Defendant,

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION,

Defendant/Counterclaim-Plaintiff.

STIPULATION AND JOINT MOTION FOR EXTENSION OF DEADLINES

Civil No. 2:03CV-0294 DAK

Honorable Dale A. Kimball

Magistrate Judge Brooke C. Wells

The parties, through their counsel of record, hereby stipulate and jointly move the Court for an Order enlarging the deadlines for the following submissions to and including the date indicated:

- June 8, 2007: Both parties' responses to all outstanding requests for admission;
- June 15, 2007: SCO's Reply Memorandum in Support of Its Motion to Deem a Perspective Third Party Deposition in Related Litigation to Be a Deposition Taken in This Case As Well;
- July 13, 2007: Rule 26(a)(3) Disclosures;
- July 27, 2007: Motions in Limine regarding expert opinions;
- August 3, 2007: Objections and counter-designations to Rule 26(a)(3) Disclosures;
- August 10, 2007: All remaining Motions in Limine;
- August 24, 2007: Deadline for Exchanging Jury Instructions;
- 45 days before trial: Final Pretrial Order;
- 30 days before trial: Special Attorney Conference and Settlement Conference; and
- Approximately six weeks prior to trial: the Court will send to the parties a Trial Order setting further deadlines for the case.

The parties submit concurrently herewith a proposed Order confirming these deadlines.

DATED this 24th day of May, 2007.

SNELL & WILMER L.L.P. Alan L. Sullivan Todd M. Shaughnessy Amy F. Sorenson

CRAVATH, SWAINE & MOORE LLP Evan R. Chesler David R. Marriott

By /s/ Amy F. Sorenson
Counsel for Defendant International
Business Machines Corporation

DATED this 24th day of May, 2007.

HATCH, JAMES & DODGE, P.C. Brent O. Hatch Mark F. James

BOIES, SCHILLER & FLEXNER LLP Edward Normand

By /s/ Edward Normand
Counsel for Plaintiff
(e-filed with authorization from counsel)

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of May, 2007, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court and delivered by CM/ECF system to the following:

Brent O. Hatch Mark F. James HATCH, JAMES & DODGE, P.C. 10 West Broadway, Suite 400 Salt Lake City, Utah 84101

Robert Silver Edward Normand BOIES, SCHILLER & FLEXNER LLP 333 Main Street Armonk, New York 10504

Stephen N. Zack Mark J. Heise BOIES, SCHILLER & FLEXNER LLP 100 Southeast Second Street, Suite 2800 Miami, Florida 33131

/s/ Amy F. Sorenson

444075