

Exhibit 3



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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

THE SCO GROUP,)	
)	
Plaintiff,)	PLAINTIFF'S SUPPLEMENTAL
)	RESPONSE TO DEFENDANT'S
)	FIRST SET OF INTERROGATORIES
v.)	
)	
INTERNATIONAL BUSINESS)	Case No. 2:03CV0294DAK
MACHINES CORPORATION,)	
)	Judge: Dale A. Kimball
Defendant.)	Magistrate Brooke C. Wells
)	

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, and the Local Rules for the United States District Court for the District of Utah, Plaintiff, The SCO Group, Inc. ("SCO"), hereby files this Supplemental Response to Interrogatories No. 1 through 8 of Defendant's First Set of Interrogatories and states as follows:

natural levels for the purposes of destroying competition in the operating systems market for UNIX software on Intel machines, and to improperly gain advantage and extract profits from customers through inducing customers to unnecessarily switch operating systems from UNIX to Linux, without any technological benefit for customers, solely to gain additional services work for IBM and license middleware to customers in lieu of operating system software. In other words, Linux adds no technology advantage to customers—its only advantage is that it is purportedly “free” for customers. If Linux is not distributed at a zero price point, customers will not switch to Linux and therefore will not purchase related IBM services or middleware. By artificially restraining the price of Linux to zero, which price is very substantially below the actual development cost contributed by IBM and others, IBM induces customers to switch to Linux. This is, among other things, unfair competition.

INTERROGATORY NO. 8:

Please identify all agreements with which plaintiff alleges IBM interfered and describe, in detail, each instance in which plaintiff alleges or contends that IBM interfered with those agreements, including but not limited to: (a) the date of the alleged interference; (b) all persons involved in the alleged interference; (c) the specific manner in which IBM is alleged to have interfered with the agreement; (d) the specific actions, if any, that IBM induced or encouraged plaintiff's customers or licensees to take; (e) the specific action, if any, that plaintiff's customer or licensee took as a result of the actions allegedly induced or encouraged by IBM; and (f) the specific trade secret or confidential or proprietary information, if any, involved in the alleged interference.

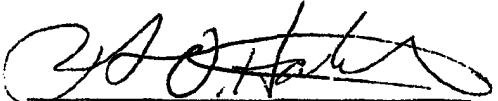
SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8:

In addition to the General Objections set forth in Plaintiff's Responses, SCO notes that discovery is in preliminary stages and SCO has not yet received responsive discovery from IBM that would allow it to fully answer this question because part of this information is peculiarly within the knowledge of IBM. Subject to and without waiving these objections, Plaintiff supplements and revises its response to this Interrogatory No. 8 and states, on information and belief, at various times from 2000 to the present, IBM has induced or attempted to induce breach of agreements between SCO and some of its customers by assisting and/or performing services in switch from UnixWare to Linux that involved or would involve breach of SCO's software agreements through improper use of shared libraries for use on Linux of various applications designed for UnixWare. Customers that IBM has contacted for such improper purposes include Sherwin Williams, Auto Zone, Target, Krogers, Advanced Auto, Shaw's Supermarkets, State of Maine (Department of Labor), Eckerds, and Safeway.

In addition, IBM, through Karen Smith and Daniel Frye and possibly others, approached certain of SCO's partners during LinuxWorld in January 2003 to induce such partners to stop doing business with SCO, including Hewlett Packard, Intel and Computer Associates. SCO's own investigation into this matter is continuing, and additional information will be provided as it becomes available, including upon receiving such information from IBM.

DATED this 23rd day of October, 2003.

As to Objections:

By: 

Stephen N. Zack
Mark J. Heise
BOIES, SCHILLER & FLEXNER LLP

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

As to Responses:

Christopher S. Sontag
Sr. Vice President
Operating Systems Division
The SCO Group, Inc.

STATE OF UTAH)
 : ss.
County of Utah _____)

The above signed Christopher S. Sontag, being duly sworn upon oath, deposes and says that he has read the above responses to discovery requests and that the responses contained therein are true to the best of his knowledge, information and belief.

Notary Public

(Seal)