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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 TO SEAL CONFIDENTIAL **DOCUMENTS**

Civil No. 2:03CV0294 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 sealing Exhibits 1 and 2 of Attachment A to the subpoena attached as Exhibit A to the Notice of Subpoena Duces Tecum re Houlihan Valuation Advisors, filed by International Business Machines Corporation ("IBM") on February 22, 2006 (Docket No. 631).

DATED this 9th day of March, 2006.

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

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

By___/s/ Todd M. Shaughnessy Counsel for Defendant International **Business Machines Corporation**

DATED this 27th day of February, 2006.

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

By___/s/ Brent O. Hatch Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of March, 2006, a true and correct copy of the foregoing was sent by U.S. Mail, postage prepaid, to the following:

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

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By___/s/ Todd M. Shaughnessy

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