

EXHIBIT H

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

<p>THE SCO GROUP, INC., a Delaware corporation, Plaintiff & Counter-Defendant, vs. NOVELL, INC., a Delaware corporation, Defendant & Counter-Plaintiff.</p>	<p>NOVELL, INC.'S SECOND SET OF REQUESTS FOR PRODUCTION TO THE SCO GROUP, INC.</p> <p>Case No. 2:04CV00139</p> <p>Judge Dale A. Kimball</p>
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TO THE SCO GROUP, INC. AND ITS COUNSEL OF RECORD:

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant and Counter-Plaintiff Novell, Inc. ("Novell") hereby requests that Plaintiff and Counter-Defendant The SCO Group, Inc. ("SCO") produce the identified documents and materials for copying and inspection at the offices of Morrison & Foerster LLP, 425 Market Street, San Francisco, California 94105, within thirty (30) days after the service of this request.

REQUEST FOR PRODUCTION NO. 18:

Please produce all documents concerning your Answer to Paragraph 15 of Novell's Counterclaims.

REQUEST FOR PRODUCTION NO. 19:

Please produce all documents concerning your Answer to Paragraph 74 of Novell's Counterclaims.

REQUEST FOR PRODUCTION NO. 20:

Please produce all documents concerning the contention at page 111 of your Memorandum in Opposition to IBM's Motion for Summary Judgment on SCO's Breach-of-Contract Claims, filed November 30, 2004, in the IBM Litigation, that "SVRX Licenses" "refer[s] just to the SVRX product Schedules that, unlike the software agreements themselves, identify all such amounts," including, but not limited to, all SVRX Product Schedules.

REQUEST FOR PRODUCTION NO. 21:

Please produce all documents concerning any licenses or agreements relating to UNIX, UnixWare, or the Merged Product (or future versions of the Merged Product) that SCO has negotiated, entered into, renewed, or amended since the execution of the APA, including, but not limited to, the licenses, agreements, renewals, or amendments, SCO revenue attributable thereto, and all communications by and between SCO and Novell relating thereto.

REQUEST FOR PRODUCTION NO. 22:

Please produce all contracts or licenses that convey or concern any right to those items listed in Section VI of Schedule 1.1(a) of the APA.

REQUEST FOR PRODUCTION NO. 23:

Please produce all contracts or licenses that convey or concern any right to those items listed in Attachment A to APA Amendment No. 1.

REQUEST FOR PRODUCTION NO. 24:

Please produce all documents concerning the drafting or negotiation of the APA.

REQUEST FOR PRODUCTION NO. 38:

Please produce all documents concerning your claim that Novell is without authority or right to effect the waivers of the IBM and Sequent agreements that Novell describes in Paragraphs 86 - 88 of its Counterclaims, including, but are not limited to, all documents concerning or cited in pages 41 - 47 and 107 - 119 of your Memorandum in Opposition to IBM's Motion for Summary Judgment on SCO's Breach-of-Contract Claims, filed November 30, 2004, in the IBM Litigation.

REQUEST FOR PRODUCTION NO. 39:

Please produce all documents concerning any statement made by Novell that you claim constitutes slander of title.

REQUEST FOR PRODUCTION NO. 40:

Please produce all documents concerning any claim that statements made by Novell concerning its ownership of UNIX or UnixWare copyrights were made with malice.

REQUEST FOR PRODUCTION NO. 41:

Please produce all documents concerning any claim that statements made by Novell concerning its ownership of UNIX or UnixWare copyrights were not privileged.

REQUEST FOR PRODUCTION NO. 42:

Please produce all documents concerning any claim that statements made by SCO concerning its purported ownership of UNIX or UnixWare copyrights were made without malice.

REQUEST FOR PRODUCTION NO. 43:

Please produce all documents concerning any claim that statements made by SCO concerning its purported ownership of UNIX or UnixWare copyrights were privileged.

REQUEST FOR PRODUCTION NO. 44:


Please produce all documents concerning SCO's efforts after the execution of the APA to market, sell, or promote its UNIX platforms and/or its products relating to UNIX or UnixWare, or to complete the Merged Product.

REQUEST FOR PRODUCTION NO. 45:

Please produce all documents concerning the transfer of any UNIX or UnixWare assets from the Santa Cruz Operation, Inc., to or between Caldera, Inc., Caldera Systems, Inc., Caldera International Inc., and/or SCO.

DATED: December 14, 2005

MORRISON & FOERSTER LLP

By: 

Kenneth W. Brakebill