Brent O. Hatch (5715) bhatch@hjdlaw.com Mark F. James (5295) mjames@hjdlaw.com HATCH, JAMES & DODGE, PC 10 West Broadway, Suite 400 Salt Lake City, Utah 84101 Telephone: (801) 363-6363

Facsimile: (801) 363-6666

dboies@bsfllp.com Robert Silver (admitted pro hac vice) rsilver@bsfllp.com Edward Normand (admitted pro hac vice) enormand@bsfllp.com **BOIES SCHILLER & FLEXNER LLP**

Armonk, New York 10504 Telephone: (914) 749-8200

333 Main Street

Facsimile: (914) 749-8300

David Boies (admitted pro hac vice)

Attorneys for Plaintiff, The SCO Group, Inc.

Stuart Singer (admitted pro hac vice) ssinger@bsfllp.com Sashi Bach Boruchow (admitted pro hac vice) sboruchow@bsfllp.com **BOIES SCHILLER & FLEXNER LLP** 401 East Las Olas Blvd. **Suite 1200** Fort Lauderdale, Florida 33301

Telephone: (954) 356-0011 Facsimile: (954) 356-0022

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

THE SCO GROUP, INC., by and through the Chapter 11 Trustee in Bankruptcy, Edward N. Cahn,

Plaintiff/Counterclaim-Defendant,

vs.

NOVELL, INC., a Delaware corporation,

Defendant/Counterclaim-Plaintiff.

SCO'S PROPOSED VOIR DIRE **QUESTIONS**

Civil No. 2:04 CV-00139

Judge Ted Stewart

PROPOSED VOIR DIRE QUESTIONS

- 1. Raise your hand if you have ever had someone accuse you of writing something inaccurate about someone else.
- 2. Raise your hand if you have been accused of taking credit for an idea that was not your own.
- 3. Raise your hand if you or someone in your immediate family has worked for a computer company or a computer software company.
- 4. Raise your hand if you have very positive opinions of large computer companies such as Novell, IBM, Microsoft, Sun, etc.
- 5. Raise your hand if you have ever used a computer operating system called UNIX or Linux.
- 6. Raise your hand if you have any familiarity with "open source" software.
- 7. Raise your hand if you know what Linux is.
- 8. Raise your hand if you like to keep up with news in the computer/technology sector.
- 9. Raise your hand if you have ever seen, read, or heard anything about disputes related to software such as UNIX and Linux.
- 10. Raise your hand if you have ever worked for a company that has declared bankruptcy.
- 11. Raise your hand if you feel you have strong feelings about a company in bankruptcy bringing claims for losses.
- 12. Raise your hand if you feel you have lost money due to a company seeking bankruptcy protection or have had a bad experience because a company sought bankruptcy protection.
- 13. Raise your hand if you or a member of your immediate family has been sued.
- 14. Raise your hand if you have ever worked for a large corporation.
- 15. Raise your hand if you have a college education.
- 16. Raise your hand if you have any work experience or special training in software development or sales.

17. Raise your hand if you have any experience with copyrights or patents.

DATED this 23rd day of February, 2010.

By: /s/ Brent O. Hatch HATCH, JAMES & DODGE, P.C. Brent O. Hatch Mark F. James

BOIES, SCHILLER & FLEXNER LLP David Boies Robert Silver Stuart H. Singer Edward Normand Sashi Bach Boruchow

Counsel for The SCO Group, Inc.

CERTIFICATE OF SERVICE

I, Brent O. Hatch, hereby certify that on this 23rd day of February, 2010, a true and correct copy of the foregoing **SCO'S PROPOSED VOIR DIRE QUESTIONS** was filed with the court and served via electronic mail to the following recipients:

Sterling A. Brennan
David R. Wright
Kirk R. Harris
Cara J. Baldwin
WORKMAN | NYDEGGER
1000 Eagle Gate Tower
60 East South Temple
Salt Lake City, UT 84111

Thomas R. Karrenberg Heather M. Sneddon ANDERSON & KARRENBERG 700 Bank One Tower 50 West Broadway Salt Lake City, UT 84101

Michael A. Jacobs Eric M. Aker Grant L. Kim MORRISON & FOERSTER 425 Market Street San Francisco, CA 94105-2482

Counsel for Defendant and Counterclaim-Plaintiff Novell, Inc.

By: /s/ Brent O. Hatch HATCH, JAMES & DODGE, P.C. Brent O. Hatch