

EXHIBIT 3

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

C.A. No. 2:04CV00139

THE SCO GROUP, INC., a Delaware
corporation

Plaintiff and
Counterclaim Defendant

V.

NOVELL, INC., a Delaware corporation
Defendant and
Counterclaim Plaintiff

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30(b)(6) Notice to Novell, Inc.
Deposition of Joseph A. LaSala, Jr.

Wednesday, May 16, 2007

9:41 a.m.

Ropes & Gray

One International Place

Boston, Massachusetts

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Reporter: Deborah Roth, RPR/CSR

21:44:30 1 about external communications about this
21:44:35 2 matter that Novell was engaged in, principally
21:44:39 3 with the press, because his -- one of his
21:44:42 4 responsibilities is press relations.

21:44:47 5 MR. BRAKEBILL: Ted, just so the
21:44:49 6 record is clear, a few of the people that
21:44:52 7 Mr. LaSala has mentioned are lawyers in the
21:44:55 8 company.

21:44:55 9 It probably is clear, but I just
21:44:57 10 want to make certain on the record that what
21:44:59 11 Mr. LaSala spoke to them about is gathering
21:45:00 12 nonprivileged information that would be
21:45:04 13 responsive to the topics, as opposed to
21:45:06 14 privileged information that would be divulged
21:45:06 15 here.

21:45:09 16 We are not waiving any privilege of
21:45:12 17 conversations he may or may not have had with
21:45:15 18 in-house lawyers with respect to issues in the
21:45:17 19 litigation.

21:45:18 20 BY MR. NORMAND:

21:45:18 21 Q. In your view, did Mr. McBride have
21:45:20 22 personal or firsthand knowledge of the issues
21:45:22 23 you spoke with him about, or were they more
21:45:26 24 issues of what Novell's interpretation of