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Attorneys for Defendant/Counterclaim-Plaintiff

International Business Machines Corporation

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.

DECLARATION OF MARTIN BLIGH

Civil No. 2:03CV-0294 DAK

Honorable Dale A. Kimball

Magistrate Judge Brooke C. Wells

I, Martin Blich, declare as follows:

1. I was employed by International Business Machines Corporation ("IBM") as a Developer in IBM's Linux Technology Center ("LTC") from 2000 to 2005. Before it was acquired by IBM in 1999, I worked for Sequent Computer Systems, Inc. ("Sequent").

2. This declaration is submitted in connection with the lawsuit brought by The SCO Group, Inc. ("SCO") against IBM, titled The SCO Group, Inc. v. International Business Machines Corporation, Civil No. 2:03CV-0294 DAK (D. Utah 2003). I make this declaration based upon personal knowledge.


3. I understand that SCO has alleged in Item 23 of its Final Disclosures that I disclosed "problems with the error event subsystem (EES) used in PTX" to Linux, in Item 90 that I disclosed problems with PTX's "method for event logging" to Linux, and in Item 192 that I disclosed "Dynix/ptx virtual memory implementation techniques".

4. All of the contributions that I have made to Linux in the areas of error event subsystems, event logging, and virtual memory were original to IBM; they did not include any System V code; they were not modifications or derivative work of System V or based on System V; and they were not written with reference to System V. IBM's contributions to Linux in error event subsystems, event logging, and virtual memory were based on the creativity and general programming experience of IBM's programmers, including myself.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed: September 12 2006.

Cupertino, California



Martin Bligh