

EXHIBIT 20

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
J.T. COLBY & COMPANY, INC.
d/b/a BRICK TOWER PRESS, J.
BOYLSTON & COMPANY, PUBLISHERS
LLC and IPICTUREBOOKS, LLC,

Plaintiff,

vs.

No. 11-cv-4060

APPLE, INC.,

Defendant.

-----X

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF
30(b)(6) JOHN T. COLBY, JR.

New York, New York

Wednesday, July 18, 2012

10:20 a.m.

Reported by:
Jennifer Ocampo-Guzman, CRR, CLR

Ref: 7845

1 Confidential-Colby

2 Q. Isn't it true that the only website
3 that the plaintiffs in this action own is the
4 -- that has any content on it relating to
5 iBooks is the BrickTowerPress.com website?

6 MR. CHATTORAJ: Objection.

7 A. Yes.

8 Q. Why didn't you put content on the
9 iBooksInc.com website?

10 A. I'm unsure how to effectively
11 market a web strategy.

12 Q. But you have a website for
13 BrickTowerPress.com, so that didn't stop you
14 from having a website for that imprint,
15 right?

16 MR. CHATTORAJ: Objection.

17 A. Didn't stop me from having that
18 imprint or that website. That's the one I
19 felt we could manage the best.

20 Q. Why?

21 A. Originally we put the iBooks
22 imprint on the Brick Tower Press site along
23 with Milk & Cookies and Brick Tower Press,
24 and then it became unmanageable to have on
25 the same website fiction under iBooks and

1 Confidential-Colby
2 fiction under Brick Tower Press. So then it
3 -- based on that, we abandoned that strategy
4 and created the website that we see now. Our
5 Brick Tower Press website has gone through
6 several iterations as the market develops.

7 Q. Let me show you what's been marked
8 as Exhibit 66.

9 (Defendant's Exhibit 66, J.
10 Boylston & Company, Booksellers, website
11 printout, marked for identification,
12 this date.)

13 Q. Who is the owner of the website
14 located at BrickTowerPress.com?

15 A. I believe that's J.T. Colby &
16 Company.

17 Q. When was the website launched?

18 A. Back in the -- back in 1990s
19 someplace.

20 Q. And Exhibit 66 reflects the whole
21 page for that website, right?

22 A. As it currently stands today,
23 that's right.

24 Q. And it says, "J. Boylston & Company
25 book sellers," and it lists categories of