

**EXHIBIT 27**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3  
4 - - - - - x

5 J.T. COLBY & COMPANY, INC.  
6 d/b/a/ BRICK TOWER PRESS,  
7 J. BOYLSTON & COMPANY,  
8 PUBLISHERS, LLC and  
9 IPICTUREBOOKS, LLC,

10 Plaintiffs

Case No.:

11 V.

11-CIV4060

12 APPLE, INC.,

13 Defendant

14 - - - - - x

15  
16 Deposition of Richard S. Goldhor, Ph.D.

17  
18 Tuesday, January 31, 2012

19 9:58 a.m.

20  
21 Goodwin Procter, LLP

22 53 State Street

23 Boston, Massachusetts

24 Reported by: Deborah Roth, RPR/CSR

25 Job # 45894

1 that ibooks is a type of technology, is that  
2 correct, or that there is something called  
3 ibooks technology?

4 A. Except at that it's -- we tended to use  
5 the singular form, ibook technology.

6 Q. Ibook technology.

7 But there is something called ibook  
8 technology that you worked on for a company  
9 called Family Systems, correct?

10 A. That's correct, yes.

11 Q. And you stated that one aspect of the  
12 ibook technology was a software application,  
13 correct?

14 A. That's correct, yes.

15 Q. And that software application was  
16 something that users of the ibook technology  
17 could download, correct?

18 A. That's right.

19 Q. They would access a website, click on a  
20 button or something like that, and download  
21 the ibook software, correct?

22 A. They would download part of it. So  
23 it's -- the architecture was what's sometimes  
24 called a client-server architecture, so there  
25 was parts of the software that stayed on a

1 server somewhere, and there was parts that a  
2 user would download onto his or her machine.

3 Q. And the user would download that  
4 software onto a machine.

5 At that time, it would have been --  
6 would it have been a desktop computer?

7 A. It could have been desktop or laptop.

8 Q. And I believe you testified that Brian  
9 Reynolds, who was -- I believe you said he was  
10 the owner of Family Systems, correct?

11 A. I don't know the legal arrangement, but  
12 he was the mover and shaker.

13 Q. And I believe you testified that  
14 Mr. Reynolds envisioned at some point having  
15 ibook software that could be used on a smart  
16 phone or tablet device, correct?

17 MS. SHEEHAN: Objection.

18 A. Just to clarify, there weren't things  
19 called smart phones and tablets, but he was  
20 very interested in something that would be  
21 easy to walk around with and would be  
22 optimized for this use, as opposed to being a  
23 general purpose computer.

24 Q. But at the time that you were working  
25 with the ibook technology, things like smart