

**EXHIBIT 6**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JT COLBY AND COMPANY, INC., D/B/A  
BRICK TOWER PRESS, J. BOYLESTON AND  
COMPANY PUBLISHERS, LLC, AND  
IPICTUREBOOKS, LLC,

Plaintiffs,

-against-

Index No.  
11-CV-4060 (DLC)

APPLE, INC.,

Defendant.

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VIDEOTAPED DEPOSITION OF

MIKE SHATZKIN

New York, New York

December 4, 2012, 9:35 a.m.

Reported By:

Nicole Sesta

Ref: 8575

1 M. Shatzkin

2 A Yes, sure.

3 MR. RASKOPF: Objection.

4 A Yes. Wait a minute. Plaintiffs,  
5 no, actually if iBooks is a plaintiff I had  
6 heard of iBooks. I had not heard of Mr. Colby.

7 Q Had you heard of JT Colby and  
8 Company?

9 A No.

10 Q Before this case?

11 A No.

12 Q Had you heard of Brick Tower Press  
13 before this case?

14 A No.

15 Q Had you heard of J. Boyleston and  
16 Company before this case?

17 A No.

18 Q Had you heard of iPicturebooks?

19 A Yes.

20 Q And in what context did you hear  
21 of iPicturebooks?

22 A Very aware of it. I'm in the  
23 business and I'm aware of what goes on in the  
24 business, and I knew Byron Preiss and I knew  
25 what Byron Preiss did. So I was aware of iBooks

1 M. Shatzkin

2 and I was aware of iPicturebooks when they were  
3 new.

4 Q Do you recall roughly when that  
5 was?

6 A Late 1990s.

7 Q Had you ever met Mr. Raskopf  
8 before this case?

9 A No.

10 Q Had you ever worked with his law  
11 firm before this case?

12 A No.

13 Q Have you heard of Allegaert Berger  
14 & Vogel?

15 A No, I haven't heard them.

16 Q You said you had heard of iBooks  
17 and iPicturebooks before. Have you ever done  
18 any work for either of those entities?

19 A No.

20 Q Had you ever done any work for Mr.  
21 Preiss?

22 A No.

23 Q Have you ever heard of a company  
24 called Byron Preiss Visual Publications?

25 A Yes.