

**EXHIBIT 64**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

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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 those processes. GOLDHOR

2 Q. Can you describe what Family Systems  
3 ibook was?

4 A. Family Systems ibook was a system and  
5 an architecture for allowing a community to  
6 create material, including text, but not  
7 limited to text, and to publish it using web  
8 technologies, but to also make it possible for  
9 multiple members of the community to edit that  
10 material, comment on it, create their own  
11 versions of it and so forth.

12 Q. In some way it sounds like a precursor  
13 to Facebook; would that be it?

14 A. More like a precursor to Wiki.

15 Q. Wikipedia?

16 A. Yeah.

17 Q. Who came up with the name "ibook" for  
18 the Family Systems ibook products?

19 A. I don't remember. The chances are  
20 pretty good that it was Brian. Brian was  
21 deeply involved in everything that ibook is  
22 and became and so forth, but I don't  
23 explicitly remember who came up with the name.

24 Q. When you started working for Family  
25 Systems, was the idea for Family Systems ibook