

**EXHIBIT 8**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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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.

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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 MR. CHATTORAJ: Understood.

3 Q. So now it looks like in terms of  
4 your own sales since now, is it -- which of  
5 your entities is making the sales of the  
6 electronic versions of books bearing the  
7 iBooks mark?

8 A. Ipicturebooks, LLC.

9 Q. And so you're keeping with what had  
10 been going on in the Preiss era,  
11 ipicturebooks, LLC is the entity that  
12 receives the monies from electronic books,  
13 whether they're bearing the marks iBooks or  
14 ipicturebooks; is that right?

15 A. That's how I'm doing it. I'm not  
16 100 percent sure Byron was doing it that way,  
17 but that's the way I'm doing it.

18 Q. So you don't know which of Preiss'  
19 entities received revenues from electronic  
20 sales of iBooks or ipicturebooks; is that  
21 right?

22 A. That's correct.

23 Q. So in terms of ipicturebooks, LLC,  
24 sales of electronic books in 2009 were  
25 approximately \$8,800, right, and they rose in