

**EXHIBIT 84**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3

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

Plaintiff,

vs.

Case No. 11-CIV4060 (DLC)

APPLE, INC.,

Defendant.  
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12 HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY  
13 VIDEOTAPED 30(b)(6) DEPOSITION OF STEVE GEDIKIAN  
14 Redwood Shores, California  
15 Thursday, September 27, 2012  
16  
17  
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19  
20

21 Reported by:

22 LORRIE L. MARCHANT, CSR No. 10523

RPR, CRR, CCRR, CLR

23  
24 JOB NO. 53421  
25

1 MS. RAY: It seemed a little convoluted to  
2 me, so I'm objecting to form.

3 MR. CHATTORAJ: Yeah. No. I understand.  
4 I'm just trying to figure out what's wrong with the  
5 question in a way that helps the witness understand  
6 what I'm talking about.

7 BY MR. CHATTORAJ:

8 Q. Do you primarily read downloaded books in  
9 iBooks?

10 A. I will primarily go to the iBookstore, and  
11 I will find something that I like and download it,  
12 and then I will read it with iBooks.

13 Q. And when you download something that you  
14 like and read it with iBooks, is -- are such  
15 downloaded files typically in EPUB format?

16 A. As I said earlier in my testimony, the  
17 iBookstore offers both EPUB- and iBooks  
18 Author-formatted books.

19 I have -- I have both in my library. I  
20 have novels that are in EPUB format, as well as -- I  
21 believe I have one textbook that is in EPUB format,  
22 and then there's also -- yeah. I mean that's -- so  
23 both.

24 Q. So when you change the font or point size  
25 using the tool bar when reading such a downloaded

1 content on your iPad, does that act make a change to  
2 the underlying EPUB file?

3 A. The physical -- the actual digital file  
4 that's stored on the device?

5 Q. Yes.

6 MS. RAY: Objection.

7 Go ahead.

8 THE WITNESS: I'm not certain.

9 BY MR. CHATTORAJ:

10 Q. Who would know that?

11 A. Actually, no, it doesn't. It doesn't  
12 change that. It's stored in a database on the  
13 device, so that -- it's -- the device -- iBooks will  
14 keep your preferences for how you -- where you left  
15 off and the background color and your font size and  
16 all of that, and so it doesn't -- it keeps that  
17 information separate than the actual document.

18 Q. So bookmarks, are those stored in that  
19 separate data file?

20 A. I believe that to be the case.

21 Q. Are annotations saved in that separate data  
22 file?

23 A. I believe that to be the case.

24 Q. And highlighting, is that also stored in  
25 that separate data file?