

EXHIBIT 91

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

Plaintiff,

vs.

Case No. 11-CIV4060 (DLC)

APPLE, INC.,

Defendant.

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VIDEOTAPED DEPOSITION OF GRACE KVAMME

Redwood Shores, California

Tuesday, September 25, 2012

Reported by:

LORRIE L. MARCHANT, CSR No. 10523
RPR, CRR, CCRR, CLR

JOB NO. 53420

1 MR. CHATTORAJ: Why don't you give her the
2 instruction.

3 MS. RAY: I'm going to object and caution
4 the witness not to answer the question to the extent
5 it would get into privileged communication with
6 either in-house or outside counsel for Apple.

7 THE WITNESS: Privileged conversations.

8 BY MR. CHATTORAJ:

9 Q. Okay. So other than in privileged
10 conversations with counsel, you have no knowledge
11 about a company called Family Systems?

12 A. No.

13 Q. Outside of communications with counsel, you
14 never heard of the company called Family Systems?

15 A. No.

16 Q. And outside of communications with counsel
17 concerning this lawsuit, you never heard of Family
18 Systems?

19 A. No.

20 Q. For the record, did Apple conduct any
21 marketing surveys concerning customers of Family
22 Systems?

23 MS. RAY: Same objection.

24 THE WITNESS: No.

25 ///

1 BY MR. CHATTORAJ:

2 Q. Did Apple conduct any marketing campaigns
3 addressed to customers of Family Systems?

4 MS. RAY: Objection.

5 THE WITNESS: Not specifically associated
6 with that company. We -- we surveyed customers,
7 but -- and they may have been associated with Family
8 Systems, but we wouldn't have known that.

9 BY MR. CHATTORAJ:

10 Q. So it's fair to say they weren't targeted
11 at customers of Family Systems; right?

12 A. They weren't -- no. There were no surveys
13 targeted at customers of Family Systems.

14 Q. Did Apple engage in any marketing efforts
15 to identify the customers of Family Systems?

16 A. No.

17 Q. Did Apple engage in any marketing efforts
18 to identify the users of Family Systems software?

19 A. No.

20 Q. Is the iBooks software application marketed
21 as an interactive Web collaborative system?

22 A. Interactive Web collaborative system? Is
23 that what you said?

24 Q. That is what I said.

25 A. And did -- was that related to iBooks?