

CONFIDENTIAL

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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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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 A. The type of product Family Systems  
3 created and used is nothing like an eBook  
4 that we use today.

5 Q. Can you -- have you ever used  
6 Apple's iBooks' app?

7 A. Yes, I have.

8 Q. How would you use it?

9 A. Downloaded PDF files of catalogs.

10 Q. Have you ever gone to the Family  
11 Systems website?

12 MR. CHATTORAJ: Objection.

13 A. No.

14 Q. Do you know what the functionality  
15 of that website was?

16 MR. CHATTORAJ: Objection.

17 A. Somewhat.

18 Q. Isn't it true that the Family  
19 Systems is no longer using the term iBook and  
20 has switched to a different mark?

21 MR. CHATTORAJ: Objection.

22 A. I don't know.

23 Q. You also -- topic 100 states --  
24 asks for information about the allegations in  
25 the complaint that Apple committed fraud on