

EXHIBIT G

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3
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 And then there were the people who
2 ran the various estates that Brian had, and
3 from time to time we would interact with them,
4 and I don't remember their names either.

5 Q. I want to go back briefly to our
6 discussion regarding whether a book such as
7 Moby Dick that was already published would be
8 available through Family Systems ibook.

9 You mentioned that Brian Reynolds
10 wanted to encourage people to use the software
11 in different ways, but Family Systems would
12 never offer a published book as an ibook
13 product, such as Goldhor 10 and Goldhor 11?

14 MS. RAY: Objection. Lack of
15 foundation. Calls for speculation. Objection
16 to form.

17 A. They certainly never did during the
18 time when I was there, and from what I know of
19 Brian's interests, it would have to be a very
20 unusual circumstance.

21 The reason -- one reason I believe
22 that is that, as I say, Brian's interest was
23 focused on communities of contributors. So it
24 would have to be the sort of situation where a
25 high school class was going to read Moby Dick

1 and make comments, and the material was being
2 put up on the web to be a foundation or a
3 framework for those comments.

4 Q. It would be a collaborative interactive
5 experience?

6 MS. RAY: Objection to form, lack of
7 foundation and calls for speculation.

8 A. That's correct.

9 Q. Did you work on other projects for
10 Family Systems outside of ibook?

11 A. Yes.

12 Q. What projects?

13 A. Well, and this may give you a good idea
14 of the range of activities, at one point --
15 and I forget the year -- but Brian married
16 Betsy Johnson, a clothing designer.

17 Q. Yes.

18 A. And the wedding was in Yorkshire and he
19 invited friends from all over the world, and
20 he had his technical staff come over to set up
21 a sound stage in a residence he had in
22 Yorkshire for use before the wedding, and
23 he created an ibook to record the wedding
24 activities, and he had us prepare a
25 demonstration of all of the various things