

Exhibit 2

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December 18, 2012

Via Electronic Mail

David Shaiman
Allegaert Berger & Vogel LLP
111 Broadway, 20th Floor
New York, NY 10006

Re: *J.T. Colby & Co., Inc., et al. v. Apple Inc.*, No. 11 cv 4060

Dear David:

I am writing regarding the deposition of Dr. Susan Schwartz McDonald, which took place on December 12, 2012. As you know, during the deposition, Defendant's counsel called for the production of (1) all books that were provided to Dr. McDonald, both electronic and physical (McDonald Dep. Tr. 42:15-19) and (2) copies of books bearing the iBooks or iPictureBooks imprint that are on Dr. McDonald's Kindle (McDonald Dep. Tr. 185:6-16). Defendant formally renews its request for the production of these documents. In addition, please produce the following documents and information related to Research Now and Dr. McDonald's surveys:

1. The requirements for becoming a Research Now member.
2. Information regarding how Research Now recruits members, including the names of all websites on which Research Now solicits or intercepts people to see if they qualify for panel membership.
3. The minimum number of surveys per year in which Research Now panelists are required to participate.
4. The maximum number of surveys per year in which Research Now panelists are allowed to participate.
5. The steps Research Now takes to ensure that panelists do not sign up for Research Now under multiple email addresses.

6. Rules from Research Now regarding what types of surveys may be conducted using its panel, including whether or not Research Now allows its panel to be used for litigation surveys.
7. A copy of the invitation referenced on page ten of the McDonald Report (the "Invitation"), which was sent by Research Now to its members inviting them to visit the National Analysts Worldwide website for screening.
8. Data regarding how many people were sent the Invitation and the age, gender, and geographic location of the people to whom Research Now sent the Invitation.
9. Information regarding how individuals were selected to receive the Invitation, including information about any pre-requisites panelists were required to have in order to receive an Invitation.
10. The number of people who clicked on the link in the invitation, but did not complete the survey.
11. Data regarding the age, gender, and geographic location of everyone who took the survey screener, not just those who qualified for the survey.
12. The reward respondents received for completing the survey.
13. Information regarding the steps taken by Research Now to validate the survey, including, for example, asking respondents to verify information that they had previously given to Research Now in order to confirm the identity of the respondents.
14. The mechanism by which Research Now confirms the age and gender of its members, if any.

Please produce this information immediately as required by Federal Rule of Civil Procedure 26(a)(2).

Sincerely,


Bonnie L. Jarrett

cc: All counsel of record