

EXHIBIT 4

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,

Plaintiffs,

vs.

No. 11-cv-4060 (DLC)

APPLE, INC.,

Defendant.

-----X

November 6, 2012

10:16 a.m.

Videotaped deposition of SIEGRUN
KANE, ESQ., held at the offices of
Kirkland & Ellis LLP, 601 Lexington
Avenue, New York, New York, pursuant to
Agreement, before Theresa Tramondo, a
Notary Public of the State of New York.

Job No: 27809

1 S.D. Kane

2 you're asking me, yes.

3 Q. So my question to you, the answer
4 is correct, right?

5 MS. CENDALI: Objection.

6 A. I'm sorry, I lost your question.

7 Q. You essentially accepted the
8 trademark assignment document at face value?

9 A. Well, my report was not meant to be
10 an evaluation of the validity of the
11 assignment. This was -- so this sentence
12 wasn't meant to be an opinion on the validity
13 of the assignment.

14 My report was, as I've mentioned
15 before, focused on what the -- what Apple
16 submitted to the PTO and the --

17 Q. You took it as a given that the
18 trademark was validly assigned from Family
19 Systems to Apple in --

20 A. I did not reach a determination.

21 Q. -- in your report?

22 A. I did not -- no, no, I did not
23 reach a determination. I did not view that
24 issue -- review that issue, as an expert.

25 Q. Did you tell Apple that you could