

EXHIBIT 8

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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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HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
VIDEOTAPED 30(b)(6) DEPOSITION OF STEVE GEDIKIAN
Redwood Shores, California
Thursday, September 27, 2012

Reported by:

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

JOB NO. 53421

1 MS. RAY: Kirkland & Ellis, as you know.
 2 MR. CHATTORAJ: Which employee of Kirkland
 3 & Ellis produced the document?
 4 MS. RAY: I don't know.
 5 MR. CHATTORAJ: Have you seen the document
 6 yourself?
 7 MS. RAY: I believe I have seen the
 8 document, yes, if we're talking about the same one.
 9 If you want to show it to me, I can tell you if I've
 10 seen that document before.
 11 Is this now my deposition?
 12 MR. CHATTORAJ: I see that additional
 13 documents were produced at 2:18 p.m. local time
 14 today by Kirkland & Ellis. Are those documents
 15 relevant to this deposition, Ms. Ray?
 16 MS. RAY: I don't know what documents
 17 you're referring to. If you want to print them out
 18 and show them to me, I can take a look at them.
 19 MR. CHATTORAJ: I can't because all I have
 20 is the production letter. Apparently we're
 21 receiving it tomorrow.
 22 MS. RAY: Well, I don't know what they are.
 23 I've been sitting in this deposition. I was not
 24 producing documents to you at 2:18 local time.
 25 MR. CHATTORAJ: Did you participate in the

1 preparation of the documents?
 2 MS. RAY: Unless I see them, I can't know
 3 whether I did or not.
 4 MR. CHATTORAJ: I am showing Counsel a
 5 document, as she suggested.
 6 And I ask you to verify. Is this the
 7 document you're referring to (indicating)?
 8 MS. RAY: I believe it is.
 9 MR. CHATTORAJ: Okay. We'll print that out
 10 and look at that after the next break.
 11 BY MR. CHATTORAJ:
 12 Q. Mr. Gedikian, is the iBooks software
 13 application an interactive Web collaboration system?
 14 A. It could be interpreted in that way, yes.
 15 Q. How?
 16 A. By interactive, when you open a document
 17 with iBooks, you can interact with the contents of
 18 that document. You can swipe through pages. You
 19 can change the background. You can change the font
 20 and point size. You can add commentary in the form
 21 of notes and highlights. You can-- so, yeah. So in
 22 those ways it is an interactive -- read the
 23 description again.
 24 Q. Interactive Web collaboration system.
 25 A. Yeah. You could view it that way. For

1 example, if my wife and I both had iBooks and were
 2 using the same account, we could both be looking at
 3 the same document and making such edits and changes
 4 to them.
 5 Q. Are you and your wife permitted by Apple's
 6 terms of use to share the same account?
 7 A. I don't know.
 8 Q. Is it part of Apple's marketing
 9 communications to the general public that they
 10 should share iTunes accounts?
 11 A. In my experience, when we talk about
 12 "accounts," we talk about them in the context of one
 13 account per person.
 14 Q. So other than sharing iTunes accounts, are
 15 there other ways in which this phrase, "interactive
 16 Web collaboration systems," would apply to iBooks?
 17 A. Well, the fact that I can also take the
 18 highlights in the book and the commentary that I add
 19 and share them with my friends or my wife via e-mail
 20 or other mechanisms, I believe that is another
 21 interpretation of how iBooks is an interactive
 22 collaboration tool.
 23 Q. So you're able to send e-mails from within
 24 the iBooks application?
 25 A. Yes. So if I type up a highlight -- or if

1 I make a highlight and add a notation to it or a
 2 passage or a comment or whatever, there is a way for
 3 me to go and share that note directly from inside of
 4 iBooks, which would bring up an e-mail form inside
 5 of iBooks and send it.
 6 In the same way that you can share photos,
 7 for example, from the Photos app via an e-mail.
 8 Q. In my experience of iOS, if I'm using the
 9 Photos app or iBooks app or iTunes -- withdrawn.
 10 When I'm using the iBooks app in iOS and
 11 I -- I seek to e-mail a document, doesn't it open
 12 the Mail app?
 13 A. I don't believe that to be the case. I
 14 believe a mail sheet -- an e-mail sheet comes up on
 15 top of the app, at which point you can pick your
 16 sender and subject and you can see the body of the
 17 message that is pre-populated by iBooks, and then
 18 you can send that message. And when you press send,
 19 iBooks is still visible.
 20 Q. But as a technical matter, is that mail --
 21 is that e-mail functionality -- withdrawn.
 22 As a technical matter, does the e-mail need
 23 to be sent by the e-mail client that's installed on
 24 an iOS device?
 25 A. As a technical matter, the e-mail sheet is