

EXHIBIT 15

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 J.T. COLBY & COMPANY, INC.,
5 d/b/a BRICK TOWER PRESS,
6 J. BOYLSTON & COMPANY,
7 PUBLISHERS, LLC and
8 IPICTUREBOOKS, LLC,
9

Plaintiff,

vs.

Case No. 11-CIV4060 (DLC)

APPLE, INC.,
9

Defendant.
10 -----/
11

12 HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER
13 Attorneys' Eyes Only Confidential Pages 300 - 302
14 VIDEOTAPED DEPOSITION OF THOMAS LA PERLE
15 30(b)(6) Capacity
16 Redwood Shores, California
17 Wednesday, September 19, 2012
18
19
20
21

22 Reported by:

23 LORRIE L. MARCHANT, CSR No. 10523

RPR, CRR, CCRR, CLR

24
25 JOB NO. 53418

1 record at 2:08 p.m. You may proceed.

2 BY MR. CHATTORAJ:

3 Q. Good afternoon, Mr. La Perle.

4 A. Good afternoon.

5 Q. Before lunch we were talking about a
6 company called Family Systems. I believe you
7 testified that you became familiar with the
8 existence of Family Systems and its business in the
9 months after you joined Apple in September of 1999,
10 and that you also were aware of the existence of
11 Family Systems and its business around the time of
12 the acquisition of Family Systems "ibook" mark.

13 Is that a fair characterization of your
14 testimony?

15 A. Yes.

16 Q. Between 1999, when you joined Apple, and
17 the initial contacts that were made in connection
18 with the acquisition of the "iBooks" mark, did you
19 have any other communications with Family Systems?

20 A. I believe there were a few times where,
21 because of consents required for trademark
22 applications --

23 THE REPORTER: Required for? I'm sorry.

24 THE WITNESS: Consent -- consents to
25 trademark applications, there --

1 (Discussion off the record.)

2 THE WITNESS: I believe there were some --
3 a few correspondence. And I believe in 2008, they
4 had approached us and offered to sell their rights
5 at that point.

6 BY MR. CHATTORAJ:

7 Q. Sell their rights to what?

8 A. To the "ibooks" mark and the goodwill
9 associated with it.

10 Q. It's probably because you had a very nice
11 lunch and you've got a lot of energy.

12 A. Yeah.

13 Q. You need to -- you need to slow down a
14 little bit because I'm having trouble following you,
15 so I imagine it's hard for the court reporter as
16 well.

17 MR. CHATTORAJ: I'm sorry. Did you get
18 that?

19 THE REPORTER: I just got that.

20 MR. CHATTORAJ: Could you read it back,
21 please. The answer.

22 MS. CENDALI: There's a loud rush in the
23 room. I don't remember if that --

24 THE REPORTER: It was here before too.

25 (Discussion off the record.)