

EXHIBIT 52

HIGHLY CONFIDENTIAL
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

1
2
3 - - -
4 J.T. COLBY & COMPANY, : Case Number
5 INC. d/b/a BRICK TOWER : 11-CV-40260
6 PRESS; J. BOYLSTON & : (DLC)
7 COMPANY, PUBLISHERS LLC :
8 and IPICTUREBOOKS :
9 LLC, :
10 Plaintiffs, :
11 vs. :
12 APPLE, INC., :
13 Defendant. :

11
12 October 3, 2012
13 HIGHLY CONFIDENTIAL

14 - - -
15 Videotaped deposition of GLENN
16 GUNDERSEN, ESQUIRE, taken at the offices of
17 Veritext National Court Reporting Company,
18 1801 Market Street, Suite 1800, Philadelphia,
19 Pennsylvania 19103, beginning at 9:24 a.m.,
20 before LINDA ROSSI RIOS, RPR, CCR and Notary
21 Public.

22
23 - - -
24 VERITEXT NATIONAL COURT REPORTING COMPANY
25 MID-ATLANTIC REGION
1801 Market Street - Suite 1800
Philadelphia, Pennsylvania 19103

1 GLENN GUNDERSEN, ESQUIRE - HIGHLY CONFIDENTIAL

2 A. Tony Lupo represented Apple in
3 that transaction.

4 Q. Were you acquainted with Mr.
5 Lupo before January 2010?

6 A. I'm not sure.

7 Q. Did Dechert LLP draft the
8 agreement that occurred -- withdrawn.

9 Did Dechert LLP draft the
10 agreement between Apple and Family Systems in
11 January 2010?

12 A. Dechert LLP drafted the
13 agreement with Family Systems in January 2010.

14 Q. Did anybody other than Dechert
15 LLP personnel, including you, have input into
16 the contents of that agreement?

17 A. Did anyone not connected with
18 Dechert?

19 Q. Yes.

20 A. What do you mean by "anybody"?

21 Q. Without revealing the
22 substance, are there words contained in the
23 agreement that were included in the agreement
24 at the instance of anyone other than yourself
25 or other employees of Dechert LLP?