

EXHIBIT 59

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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

8 Plaintiff,

9 vs.

Case No. 11-CIV4060 (DLC)

10 APPLE, INC.,

11 Defendant.

12 -----/

13 VIDEOTAPED DEPOSITION OF GRACE KVAMME

14 Redwood Shores, California

15 Tuesday, September 25, 2012

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21 Reported by:

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

24 JOB NO. 53420

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1 somebody else; is that right?

2 A. I believe that -- go ahead.

3 MS. RAY: Objection.

4 THE WITNESS: I believe that you can send
5 your notes that you've taken to somebody else.

6 BY MR. CHATTORAJ:

7 Q. And they may or may not be an iBooks user?

8 MS. RAY: Objection.

9 THE WITNESS: I don't believe it's required
10 that they're an iBooks user.

11 BY MR. CHATTORAJ:

12 Q. Does Apple encourage people to share their
13 iTunes accounts with others so that they can share
14 books through the iBooks application?

15 MS. RAY: Objection.

16 THE WITNESS: Apple doesn't encourage
17 sharing of accounts.

18 BY MR. CHATTORAJ:

19 Q. In your work in connection with iBooks, do
20 you do consumer research and surveys on specific
21 electronic books or genres?

22 MS. RAY: Objection.

23 THE WITNESS: We have not surveyed specific
24 titles. We have done some research on genres or
25 types of books that customers like or acquire.