

**EXHIBIT 7**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3  
4 - - - - - x

5 J.T. COLBY & COMPANY, INC.

6 d/b/a/ BRICK TOWER PRESS,

7 J. BOYLSTON & COMPANY,

8 PUBLISHERS, LLC and

9 IPICTUREBOOKS, LLC,

10 Plaintiffs

Case No.:

11 V.

11-CIV4060

12 APPLE, INC.,

13 Defendant

14 - - - - - x

15  
16 Deposition of Richard S. Goldhor, Ph.D.

17  
18 Tuesday, January 31, 2012

19 9:58 a.m.

20  
21 Goodwin Procter, LLP

22 53 State Street

23 Boston, Massachusetts

24 Reported by: Deborah Roth, RPR/CSR

25 Job # 45894

1 like that. GOLDHOR

2 Q. What products did ibook offer in  
3 addition to the ibook controller?

4 A. I think of the --

5 MS. RAY: Objection. Lack of  
6 foundation.

7 A. -- ibook technology as more of a  
8 service than a product. It had many different  
9 pieces to it, particularly as Brian continued  
10 to develop it after my time. But in some  
11 sense, it was all of a piece. It was all  
12 centered around this notion of making it -- it  
13 was all software and rules to make it possible  
14 for communities to collaborate and publish  
15 content and comment on each other's content  
16 and so forth.

17 Q. Did Family Systems ever offer  
18 electronic versions of books that were already  
19 in print on its website?

20 A. Not to my knowledge.

21 Q. Did Family Systems ever offer  
22 electronic versions of books already in print  
23 as part of its ibook products?

24 MS. RAY: Objection. Lack of  
25 foundation.

1 A. Not to my knowledge.

2 Q. Did Family Systems ever offer  
3 electronic versions of fiction books already  
4 in print?

5 MS. RAY: Objection. Lack of  
6 foundation.

7 A. I think that Brian would have been  
8 delighted to have someone use the ibook  
9 technology to create fiction, but if you mean  
10 did -- were there instances where people  
11 uploaded existing published works of fiction?

12 Q. Yes.

13 A. No. Again, these rules of use that I  
14 was describing to you, I know that that was  
15 one of the issues that was thrashed out at  
16 great length, and from time to time various  
17 rules were proposed. But in general, Brian  
18 was much more focused on people using the  
19 ibook technology to create new material.

20 Q. So, for example, an electronic version  
21 of Moby Dick would not be available through  
22 Family Systems ibook products?

23 MS. RAY: Objection. Lack of  
24 foundation. Calls for speculation.

25 A. That statement per se isn't true, as