

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

Plaintiffs,

vs.

No. 11-cv-4060 (DLC)

APPLE, INC.,

Defendant.

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November 21, 2012

9:31 a.m.

Videotaped deposition of GREGORY
S. CARPENTER, Ph.D., held at the offices
of Quinn Emanuel Urquhart & Sullivan LLP,
51 Madison Avenue, New York, New York,
pursuant to Agreement, before Theresa
Tramondo, a Notary Public of the State of
New York.

Job No: 27811

1 Carpenter

2 Q. You disagree, okay.

3 So you think no matter what
4 industry is on the table, you are capable of
5 providing an opinion with respect to various
6 issues in that industry, right?

7 A. With enough analysis, yes.

8 Q. And so you've not ever been
9 employed in the book publishing industry,
10 have you?

11 A. I've not.

12 Q. And you've not ever consulted for a
13 book publisher, have you?

14 A. I've provided executive seminars
15 for people in magazine publishing and media
16 and related businesses and many businesses
17 that have characteristics associated with
18 book publishing.

19 Q. Did you mention magazine
20 publishing?

21 A. I did.

22 Q. You gave a seminar?

23 A. I did.

24 Q. When?

25 A. I've given a number of them over