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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

18 NATIONAL FEDERATION OF THE
19 BLIND, the NATIONAL FEDERATION OF
20 THE BLIND OF CALIFORNIA, on behalf of
21 their members and all others similarly situated,
22 and BRUCE F. SEXTON, on behalf of himself
23 and all others similarly situated,

24 Plaintiffs,

25 v.

26 TARGET CORPORATION

27 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

**DECLARATION OF BRUCE F. SEXTON
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

Hearing Date: April 16, 2007
Time: 2:00 PM
Judge: The Hon. Marilyn Hall Patel

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1 I, Bruce F. Sexton, Jr., declare as follows:

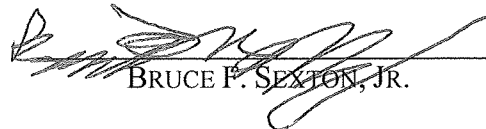
2 1. The facts in this declaration are based upon my personal knowledge. If called to testify,
3 I could testify competently to the facts described in this declaration.

4 2. As I stated in an earlier declaration in this case, I often use the product listings and
5 descriptions on retail stores' websites in order to research products, compare prices, and make
6 decisions about purchasing goods in the stores' physical locations. As I also stated in an earlier
7 declaration in this case, I have shopped at Target's retail stores for several years. On numerous
8 occasions, I have attempted to access Target.com to research products that are available at
9 Target's retail stores, compare the prices of goods at Target's retail stores with the prices of
10 Target's competitors, and to make decisions about purchasing goods at Target's retail stores.
11 However, because of various accessibility barriers on Target.com, I have not been able to use
12 Target.com for these purposes.

13 3. My primary goal in this case has been to ensure that Target.com becomes and remains
14 fully and equally accessible to people who are blind and visually impaired.

15
16 I declare under penalty of perjury under the laws of the State of California that the
17 forgoing is true and correct.

18 Executed this 20 day of March, 2007, at Berkeley, California.

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22 BRUCE F. SEXTON, JR.

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