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UNITED STATES DISTRICT COURT
 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,
 and BRUCE F. SEXTON, on behalf of himself
 and all others similarly situated,

Plaintiffs,

v.

TARGET CORPORATION

Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

**DECLARATION OF ANNE TAYLOR IN
 SUPPORT OF PLAINTIFFS' REPLY IN
 SUPPORT OF MOTION FOR CLASS
 CERTIFICATION**

Hearing Date: May 1, 2007

Time: 2:00 PM

Judge: The Hon. Marilyn Hall Patel

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1 I, Anne Taylor, 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. I am the Director of Access Technology for the National Federation of the Blind. In that
5 position I (a) run technology training seminars for rehabilitation professionals and consumers;
6 (b) configure and maintain state-of-the-art access technology and test emerging software; (c)
7 evaluate access technology software and hardware and provide feedback to manufacturers and
8 guidance to consumers; (d) provide technical assistance on the accessibility of GPS systems,
9 voting machines, ATMs, computer systems and other consumer technologies via the NFB
10 Technology Answer Line; and (e) provide technical support to the staff of the National Center
11 for the Blind, and direct the progress of the Accessible Home Initiative Consumer Electronics
12 Accessibility project.

13 3. Through my work, I am familiar with the use of screen access software by the blind and
14 visually-impaired community to access the internet and perform other computer functions. As I
15 stated in an earlier declaration in this case, it is apparent to me that the use by the blind of screen
16 access software has become widespread. For example, according to Freedom Scientific, the
17 manufacturer of JAWS, there are more than 100,000 people using JAWS screen access software
18 alone, in addition to people using other screen access software brands. This information can be
19 found at http://www.freedomscientific.com/fs_about/history.asp. In addition, a 2001 article
20 estimated that there were 1.5 million visually-impaired computer users, and 200,000 internet
21 users with a "severe limitation in seeing." Gerber, Elaine and Kirchner, Corrine, Who's Surfing?
22 Internet Access and Computer Use by Visually Impaired Youth and Adults, Journal of Visual
23 Impairment & Blindness, 95 (3), 176-181 (2001). This article is available on the AFB website.
24 In all, a conservative estimate for the number of blind and visually-impaired people in the United
25 States who use screen access software to access the internet would be 100,000 people.

26 4. Close to 10% of the blind and visually-impaired people living in the United States reside
27 in California. Given that, a conservative estimate for the number of blind and visually-impaired
28

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1 people in California who use screen access software to access the internet would be 10,000
2 people.

3 5. I understand, from reading data maintained on www.comscore.com, that Target.com
4 receives tens of millions of visitors each month. I have no reason to believe that blind and
5 visually-impaired people who use screen access software to access the internet would be less
6 likely than sighted people to visit Target.com if it were fully and equally accessible. If anything,
7 based on my knowledge about internet use by people who are blind and visually impaired, I
8 would expect that blind and visually-impaired people who use screen access software to access
9 the internet would be more likely than sighted people to visit Target.com if it were fully and
10 equally accessible.

11 6. Based on the above, I would say that a conservative estimate for the number of blind and
12 visually-impaired people in the United States who screen access software to access the internet,
13 and who would visit Target.com if it were fully and equally accessible, would be in the
14 thousands. The actual number may be much higher. I would say that a conservative estimate for
15 the number of blind and visually-impaired people in California who use screen access software
16 to access the internet, and who would visit Target.com if it were fully and equally accessible,
17 would be in the hundreds. Again, the actual number may be much higher.

18
19 I declare under penalty of perjury under the laws of the State of California that the
20 forgoing is true and correct.

21 Executed this 27~~th~~ day of March, 2007, at Baltimore, Maryland.

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24 

25 ANNE TAYLOR
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