

DISABILITY RIGHTS ADVOCATES
2001 Center Street, Third Floor
Berkeley, CA 94704-1204
(510) 665-8644

1 LAURENCE W. PARADIS (California Bar No. 122336)
ROGER N. HELLER (California Bar No. 215348)
2 DISABILITY RIGHTS ADVOCATES
2001 Center Street, Third Floor
3 Berkeley, California 94704
Telephone: (510) 665-8644
4 Facsimile: (510) 665-8511
TTY: (510) 665-8716

5 JOSHUA KONECKY (California Bar No. 182897)
6 RACHEL BRILL (California Bar No. 233294)
SCHNEIDER & WALLACE
7 180 Montgomery Street, Suite 2000
San Francisco, CA 94104
8 Telephone: (415) 421-7100
Fax: (415) 421-7105
9 TTY: (415) 421-1655

10 DANIEL F. GOLDSTEIN (*pro hac vice*)
BROWN, GOLDSTEIN & LEVY, LLP
11 120 E. Baltimore St., Suite 1700
Baltimore, MD 21202
12 Telephone: (410) 962-1030
Fax: (410) 385-0869

PETER BLANCK (*pro hac vice*)
900 S. Crouse Ave.
Crouse-Hinds Hall, Suite 300
Syracuse, NY 13244-2130
Telephone: (315) 443-9703
Fax: (315) 443-9725

13
14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

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

22 Plaintiffs,

23 v.

24 TARGET CORPORATION

25 Defendant.
26
27
28

Case No.: C 06-01802 MHP

CLASS ACTION

**DECLARATION OF ROGER HELLER IN
SUPPORT OF PLAINTIFFS'
SUPPLEMENTAL BRIEF REGARDING
STATE LAW CLAIMS**

Hearing Date: May 1, 2007
Time: 2:00 PM
Judge: The Hon. Marilyn Hall Patel

DISABILITY RIGHTS ADVOCATES
2001 Center Street, Third Floor
Berkeley, CA 94704-1204
(510) 665-8644

1 I, Roger Heller, 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 a Senior Staff Attorney at Disability Rights Advocates and one of the attorneys
5 representing Plaintiffs in this case.

6 3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the deposition of
7 Patricia Ann Perry, taken in this case on January 9, 2007.

8 4. Attached hereto as **Exhibit B** is a true and correct copy of the Expert Declaration of Dr.
9 James W. Thatcher in Support of Plaintiffs' Motion for Preliminary Injunction, filed in this case
10 on May 8, 2006.

11 5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the deposition of
12 Charles Letourneau, taken in this case on July 5, 2006.

13 6. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the deposition of
14 Todd J. Nemoir, taken in this case on January 10, 2007..

15 7. Attached hereto as **Exhibit E** is a true and correct copy of a letter from Mazen Basrawi to
16 Robert Ulrich, dated May 5, 2005.

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

20 Executed this 26th day of April, 2007, at Berkeley, California.

21
22 

23
24 ROGER HELLER