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15 Attorneys for Defendant
TARGET CORPORATION

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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20

21 NATIONAL FEDERATION OF THE BLIND,
the NATIONAL FEDERATION OF THE
22 BLIND OF CALIFORNIA, on behalf of their
members, and Bruce F. Sexton, on behalf of
23 himself and all others similarly situated,

24 Plaintiffs,

25 v.

26 TARGET CORPORATION,

27 Defendant.

28

Case No. C06-01802 MHP

**DECLARATION OF DAWN
WILKINSON IN SUPPORT OF
TARGET CORPORATION'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Date: July 24, 2006

Time: 2:00 p.m.

Judge: The Honorable Marilyn Hall Patel

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DECLARATION OF DAWN WILKINSON

I, Dawn Wilkinson, have personal knowledge of the facts set forth below, and if called as a witness, I could and would testify under oath to the following:

1. I am 32 years old, married, and the mother of a 7 year old son. I have been completely blind since birth.

2. I am an instructor at the Arkansas School For The Blind ("ASB") in Little Rock, Arkansas, where I teach Assistive Technology to secondary school students. I have been an Instructor at the ASB for 8 years. I began teaching Assistive Technology this past school year. For the previous seven years I taught Braille to elementary school students.

3. In the sight-impaired community, Assistive Technology refers to the computer hardware and software that assists sight-impaired individuals access and use computers. Examples of assistive technology include computer integrated Braille displays, scanning software, note takers, and screen readers, such as JAWS For Windows ("JAWS"). A screen reader is a software product that audibly reads the content of a computer screen using a speech synthesizer. In addition to the JAWS screen reader, I have also used WindowEyes and Freedom Box screen readers.

4. I have used computers since 1994, and various forms of assistive technology, including JAWS For Windows, since 1995. I currently use JAWS version 7.0.

5. On or about May 21, 2006, I accessed Target.com with the intention of navigating the web site and purchasing merchandise. I conducted my online shopping excursion using JAWS version 7.0. I was able to access Target.com, navigate the various links on the site, and search for specific products. I was also able to find the specific products I was shopping for, and browse through the various departments within Target.com. I conducted searches on Target.com by category and department. Specifically, I looked at products in the music, toys and games, and "Target Exclusive" departments. I was able to add merchandise to my virtual shopping cart, and remove items I chose not to purchase. At the end of my shopping experience, I was able to complete my purchase using a credit card, and I received

1 verification of my purchase from Target.com. The products I purchased were delivered to my
2 home on May 25, 2006. During this shopping excursion, I spent a little more than two hours
3 on Target.com exploring the various functions and features offered on Target.com.

4 6. On or about May 23, 2006, I again accessed Target.com with the intention of
5 navigating the web site and purchasing merchandise. This time, I conducted my online
6 shopping excursion using FreedomBox, with System Access version 2. Again, I was able to
7 navigate the site, search for merchandise, remove merchandise from my virtual shopping cart,
8 and purchase merchandise on Target.com. The products I purchased from Target.com on May
9 23, 2006 were delivered to my home on May 27, 2006. During this shopping excursion, I
10 spent a little more than an hour exploring Target.com to see if I was able to utilize the various
11 functions and features on the website with Freedom Box.

12 7. During both of my shopping excursions on Target.com, I was able to navigate
13 and use the features on the site with little or no difficulty. When I did encounter an obstacle,
14 or when a process was unclear, I was able to figure out how to work my way around the
15 obstacle using my screen reader. I found that the product descriptions on Target.com were
16 very helpful and assisted me in making my product choices. In fact, the reason I like shopping
17 on-line is that I can get extensive and detailed information regarding a product. This is very
18 helpful.

19 8. I found my shopping experience on Target.com to be enjoyable and fun. I
20 intend to shop on Target.com again. I also intend to recommend Target.com to my friends,
21 both sighted and sight-impaired.

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9. On a final note, after my Target.com shopping experience, I asked several of my students to go to Target.com during a JAWS training class. Those students were all able to navigate Target.com with relative ease.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 9th day of June 2006, at Little Rock, Arkansas.

Dawn Wilkinson

(Handwritten signature)

DECLARATION OF DAWN WILKINSON (Case No. 06-01802 MHP)

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