

EXHIBIT 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

28 Plaintiffs,

v.

TARGET CORPORATION,

Defendants.

Case No.: C 06-01802 MHP

CLASS ACTION

**DECLARATION OF DENISE M.
ALTOBELLI IN SUPPORT OF
PLAINTIFFS' SUPPLEMENTAL BRIEF
IN SUPPORT OF MOTION FOR CLASS
CERTIFICATION**

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1 I, Denise M. Altobelli, 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 Senior Paralegal at the law firm of Brown, Goldstein & Levy, LLP.
5 3. I graduated from University of Maryland, College Park, with a Bachelor of Arts Degree
6 in 1986 and a Doctor of Jurisprudence from the University of Baltimore School of Law in 1989.
7 4. I am a member of the bar of Pennsylvania. Since 1996 I have worked as a paralegal at
8 Brown, Goldstein & Levy, LLP.
9 5. In searching the target.com website, on Thursday, July 19, 2007, I found information on
10 at least 427 products that are identified as being available in the stores. To determine this, I
11 searched the target.com website using the term “stores.” Of the 1069 items, 427 were identified
12 as available in the Target stores. (Ex. A)
13 6. For each item labeled as available in stores was a link that allowed me to determine if the
14 item is available at a Target store near a particular zip code or address. (Ex. B)
15 7. On target.com, shoppers can learn about the brands, price, size, color, specifications,
16 composition and dimensions of products sold at Target stores. (Ex. C)
17 8. Where appropriate, for products sold at Target stores and found on target.com, shoppers
18 can sort by brand, product or price. In addition, they can search for features, such as all digital
19 cameras with image stabilization or a certain number of pixels. (Ex. D)
20 9. Target.com also provides shoppers with multiple ways to search for gifts based on your
21 knowledge of the recipient before going to the store. For example, if you want to purchase a toy
22 for a 4-year-old boy, you can go to toys and then select the appropriate age and gender. The
23 website will then suggest appropriate items. (Ex. E) If you are searching for a gift and have no
24 idea what to purchase, target.com has a “gift finder” that offers searches based on event, like a
25 graduation or housewarming, or characteristic of the recipient, like teen girl or grandparent, or
26 the type of item you are looking for, like “Gadgets” or “Guy Stuff”, and then allows you to refine
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1 your search further by amount you want to spend, age group, gender or whether the item is a
2 “best seller.” (Ex. F)

3 10. If a shopper is looking for a gift for someone registered on the Target registries, like Club
4 Wedd or the Baby registry, they can easily review the list of items desired and determine which
5 items are available at their local store. (Ex. G.)

6 11. Target.com frequently offers a greater selection than its competitors. For example, on
7 costco.com, there are only 84 items identified in a search for “digital camera,” compared to 285
8 items found on target.com, many of which are identified as being sold at Target stores. (Exs. D
9 & H) On Costco.com, a shopper can similarly search by price and brand but the results are not
10 as clearly refined on target.com when including additional features like “stabilization”,
11 “waterproof” or “megapixels” on a digital camera. When the term “stabilization” was added to a
12 “digital camera” search, Costco.com identified six items, only two of which were digital cameras
13 (both Hello Kitty brand) and three digital camera binoculars. (Ex. I) When searching for
14 “waterproof” and “digital camera” on the Costco site, only one item was found, a helmet camera.
15 (Ex. J) A search for “megapixel” and “digital camera” on Costco.com produced no results. (Id.)

16 12. On target.com a search using the terms “stabilization” and “digital camera” produced 100
17 items. (Ex. K) For a search of “waterproof” and “digital camera” on target.com, eight items
18 were identified. (Ex. L) A search for “megapixel” and “digital camera” resulted in 166 items.
19 (Ex. M) All of the searches identified items that are sold at Target stores.

20 13. Target.com also allows for comparison shopping before a shopper goes to the store. It
21 allows shoppers to identify items and features they may find desirable as well as compare prices.
22 A search for a 2 slice toaster revealed a Hamilton Beach, chrome toaster for \$29.99 on
23 target.com. (Ex. C) This toaster is available on both the website and in their stores. The same
24 toaster on Nextag.com showed seven vendors selling the same toaster but at prices ranging from
25 \$29.99 to \$66.75. (Ex. N) This comparison showed the price on target.com (and in the Target
26 stores) was the lowest price available.

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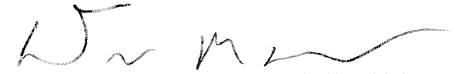
1 14. Target.com also features a weekly ad that allows shoppers to find current deals at their
2 local Target stores. (Ex. O) Shoppers can browse the ads page by page, as one would browse a
3 newspaper insert (Ex. P), or search the deals by categories, such as “back to school” or “men’s
4 casual attire.” (Ex. Q) Target.com’s weekly ads also offer an “in-store shopping list,” in which
5 shoppers can place the sale items they wish to purchase at their local store. (Exs. R & S) The
6 list of items can then be printed to take along to the store, or e-mailed to friends or family.

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

Executed this 25th day of July, 2007, at Baltimore, Maryland.



DENISE M. ALTOBELLI

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