

Exhibit A

NOTICE OF CLASS ACTION

TO: ALL LEGALLY BLIND INDIVIDUALS WHO HAVE ATTEMPTED TO ACCESS TARGET.COM SINCE FEBRUARY 7, 2004

A lawsuit has been brought against Target Corporation concerning the Target.com website. The lawsuit is proceeding as a class action in the United States District Court for the Northern District of California before Judge Marilyn Hall Patel under case number 06-cv-1802.

According to the plaintiffs who initiated this class action, U.S. and California law requires that websites be accessible to the blind. The plaintiffs who brought the lawsuit allege that Target.com is not accessible to the blind. Target Corporation believes that it has not violated any laws in the design of its website. In addition, Target contends that it has taken considerable efforts to make its goods and services accessible to the blind and visually impaired, and Target disputes plaintiffs' allegation that the website is inaccessible.

At issue in this lawsuit is whether there are access barriers on the Target.com website that make the website inaccessible to legally blind individuals using screen-reader software. Also at issue is whether Target's goods and services are accessible to the blind by alternative means other than the Target.com website.

This lawsuit is proceeding as a class action, and Court has certified the following two classes: (1) a nationwide class for claims under the Americans with Disabilities Act; and (2) a California class for claims under the California Unruh Act and the California Disabled Persons Act.

The plaintiffs in this action are seeking injunctive relief under the federal Americans with Disabilities Act, the California Unruh Act, and the California Disabled Persons Act. This means that they are seeking a court order that requires Target to take certain actions. In addition, the plaintiffs are seeking statutory damages on behalf of the California class under California's Unruh Act and Disabled Persons Act. Plaintiffs are not seeking punitive damages, additional damages intended to punish Target.

If you are a legally blind individual in the United States who has attempted to access Target.com since February 7, 2004, and as a result has been denied access to the enjoyment of goods and services offered in Target stores, then you are a member of the nationwide class. As a member of the nationwide class, you may select one of the following options:

1. You may choose to do nothing, in which case you will be bound by future orders and rulings in this lawsuit, including the award of any statutory damages.
2. You may seek to intervene in this lawsuit directly on your own behalf or through an attorney that you hire to represent you.

If you are a legally blind individual in California who has attempted to access Target.com since February 7, 2004, you are a member of the California class. As a member of the California class, you may choose one of the two options listed above, or alternatively, you may choose to opt out

of this lawsuit. If you opt out, you will not be awarded any statutory damages from this lawsuit. However, if you opt out, you will preserve any rights that you otherwise have to sue Target Corporation for damages, including the right to sue Target Corporation for up to three times actual damages, which may exceed the amount of damages sought on your behalf by the plaintiffs in this lawsuit. If you would like to opt out of this lawsuit, please call Rust Consulting at 1-800-999-7940 to request an opt-out form. Alternatively, you may mail or fax your request for an opt-out form to: Rust Consulting, 625 Marquette Avenue, Suite 880, Minneapolis, MN 55402; fax: 612-359-2050.

For additional information about this lawsuit, you may consult documents from the public file of this lawsuit, which is available from the United States District Court, Clerk's Office, 450 Golden Gate Avenue, San Francisco, CA 94102, (415) 522-2000.

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