

DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CALIFORNIA 94704-1204
510.665.8644

1 LAURENCE W. PARADIS (California Bar No. 122336)
lparadis@dralegal.org
2 MAZEN M. BASRAWI (California Bar No. 235475)
mbasrawi@dralegal.org
3 DISABILITY RIGHTS ADVOCATES
2001 Center Street, Third Floor
4 Berkeley, California 94704
Telephone: (510) 665-8644
5 Facsimile: (510) 665-8511
TTY: (510) 665-8716

6 TODD M. SCHNEIDER (California Bar No. 158253)
tschneider@schneiderwallace.com
7 JOSHUA KONECKY (California Bar No. 182897)
jkonecky@schneiderwallace.com
8 SCHNEIDER & WALLACE
9 180 Montgomery Street, Suite 2000
San Francisco, CA 94104
10 Telephone: (415) 421-7100
Fax: (415) 421-7105
11 TTY: (415) 421-1655

12 DANIEL F. GOLDSTEIN (*pro hac vice*)
dfg@browngold.com
13 BROWN, GOLDSTEIN & LEVY, LLP
120 E. Baltimore St., Suite 1700
14 Baltimore, MD 21202
Telephone: (410) 962-1030
15 Fax: (410) 385-0869

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

19 NATIONAL FEDERATION OF THE
20 BLIND, the NATIONAL FEDERATION OF
21 THE BLIND OF CALIFORNIA, on behalf of
22 their members, and Bruce F. Sexton, on behalf
of himself and all others similarly situated,
23
Plaintiffs,
24
v.
25 TARGET CORPORATION,
26
Defendant.

Case No.: C 06-01802 MHP
CLASS ACTION
**DECLARATION OF ANNE TAYLOR IN
SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

Hearing Date: June 12, 2006
Time: 2:00 p.m.
Judge: The Honorable Marilyn Hall
Patel

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1 I, Ann 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 legally blind.

5 3. I was graduated from Western Kentucky University with a Bachelor of Science Degree in
6 Computer Information Systems in 1998.

7 4. From February of 1999 to November 2000, I was employed by Career Vision, Inc. of
8 Louisville, Kentucky to provide training and technical support to blind clients.

9 5. Since December 2000 I have worked at the National Center for the Blind, 1800 Johnson
10 Street, Baltimore, MD and was an Access Technology Specialist of the International Braille and
11 Technology Center for the Blind ("IBTC"). My current title is Director of Access Technology
12 for the National Federation of the Blind. In that position I (a) run technology training seminars
13 for rehabilitation professionals and consumers; (b) configure and maintain state-of-the-art access
14 technology and test emerging software; (c) evaluate access technology software and hardware
15 and provide feedback to manufacturer and guidance to consumers; (d) provide technical
16 assistance on the accessibility of GPS systems, voting machines, ATMs, computer systems and
17 other consumer technologies via the NFB Technology Answer Line; provide technical support to
18 the staff of the National Center for the Blind, and direct the progress of the Inclusive Home
19 Initiative Consumer Electronics Accessibility project.

20 6. At a cost in excess of \$2,000,000, the IBTC has collected all categories of access
21 technology for the blind currently available in the United States. The IBTC tests and evaluates
22 that technology, and trains blind trainers in their use. There are two professionals and one
23 support person under my supervision at the IBTC. The NFB devotes these resources to access
24 technology because technology has the potential either to further exclude the blind from the
25 social, economic and commercial life of this country or to integrate the blind more closely into
26 our country's fabric. Unfortunately, with increasing frequency, the blind face gratuitous barriers
27 to entry, that is, the blind are confronted with barriers even when the state of the art offers
28 alternative to sight-based entry or when there would be no significant added cost to accessibility.

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1 These barriers frequently arise from a failure to consider the blind as full members of society or
2 from a lack of awareness of the adaptive techniques used by the blind.

3 7. The principal concern of access technology is the use of technology to afford persons
4 with disabilities, in this instance, blind persons, with access to information. Today, information
5 is increasingly presented in a visual electronic format. The internet, in particular, has become an
6 ever more significant source of information for blind persons, just as it has for the sighted.

7 8. It is apparent to me that the use by the blind of screen access software has become
8 widespread. The International Braille and Technology Center receives, on average, seven
9 telephonic inquiries daily, typically from blind persons. The majority of these inquiries concern
10 screen access software. Each year we train more than 100 trainers, that is, blind persons who
11 teach others the use of screen access software.

12 9. Blindness is a disability whose incidence is on the increase. As the American population
13 lives longer, as the baby boomers age and as the incidence of diabetes increases, vision loss is on
14 the rise. The fastest growing group of newly blind are seniors. Many of these seniors made use
15 of computers and the internet before their vision loss.

16 10. Except for a blind person whose residual vision is still sufficient to use magnification,
17 screen access software provides the only method by which a blind person can independently
18 access the internet.

19


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

22

Executed this April day of 28, 2006, at Baltimore, Maryland.

23

24



ANN TAYLOR

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