

1 ROBERT A. NAEVE (CA SBN 106095)
 RNaeve@mofo.com
 2 MORRISON & FOERSTER LLP
 1990 MacArthur Boulevard
 3 Irvine, California 92612-2445
 Telephone: (949) 251-7500
 4 Facsimile: (949) 251-0900
 (Additional Counsel on Signature Page)

5 Attorneys for Defendant
 6 TARGET CORPORATION

7 LAWRENCE W. PARADIS (CA SBN 122336)
 lparadis@dralegal.org
 8 MAZEN M. BASRAWI (CA SBN 235475)
 mbasrawi@drlegal.org
 9 DISABILITY RIGHTS ADVOCATES
 2001 Center Street, Third Floor
 10 Berkeley, CA 94704
 Telephone: (510) 665-8644
 11 Facsimile: (510) 665-8716
 TTY: (510) 665-8716
 12 (Additional Counsel on Signature Page)

13 Attorneys for Plaintiffs

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 NATIONAL FEDERATION OF THE BLIND,
 17 the NATIONAL FEDERATION OF THE BLIND
 OF CALIFORNIA, on behalf of their members,
 18 and Bruce F. Sexton, on behalf of himself and all
 others similarly situated,

19 Plaintiffs,

20 v.

21 TARGET CORPORATION,

22 Defendant.

Case No. C06-01802 MHP

PUTATIVE CLASS ACTION

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER:**

- (1) CONTINUING THE HEARING ON NFB'S MOTION FOR PRELIMINARY INJUNCTION AND TARGET'S MOTION TO DISMISS;
- (2) AMENDING BRIEFING SCHEDULE ON BOTH MOTIONS; AND
- (3) GRANTING THE PARTIES LEAVE TO TAKE ADDITIONAL DISCOVERY

[Local Rule 6-2]

1 RECITALS

2 1. Pursuant to the parties' stipulation, this Court's May 11, 2006 order consolidated
3 and continued to June 26, 2006 the hearings on Defendant Target Corporation's ("Target")
4 motion to dismiss the amended complaint on file in this action ("Target's Motion") and on
5 Plaintiffs National Federation of the Blind, the National Federation of the Blind of California and
6 Bruce F. Sexton's ("NFB") motion for preliminary injunction ("NFB's Motion"). The Order also
7 granted Target leave from the stay imposed by General Order 56 to depose five individuals who
8 offered declarations in support of NFB's motion for preliminary injunction.

9 2. The parties agree the stay imposed by General Order 56 should be further lifted (1)
10 to allow Target to depose four additional witnesses who have offered declarations in support of
11 NFB's Motion (to expedite matters, the parties have already commenced these depositions); and
12 (2) to allow NFB to depose any witnesses who offer declarations in support of Target's
13 opposition to NFB's Motion.

14 3. The parties also agree that the hearing on both Target's Motion and NFB's Motion
15 should be continued from June 26, 2004 to July 24, 2006 at 2:00 p.m., pursuant to the schedule
16 outlined below, in order to allow the parties additional time to take discovery in connection with
17 NFB's Motion and to and prepare and file opposition and reply memoranda in connection with
18 NFB's Motion and Target's Motion.

19 4. The parties agree that the continuance does not affect the timeliness of NFB's
20 Motion.

21 STIPULATION

22 THEREFORE, the parties hereby stipulate as follows:

23 1. The hearing date on NFB's Motion and Target's Motion shall be continued to
24 July 24, 2006 at 2:00 p.m.

25 2. NFB's opposition to Target's Motion and Target's opposition to NFB's Motion
26 shall be filed on or before June 12, 2006. Reply briefs shall be filed on or before July 10, 2006.

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