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15 Attorneys for Defendant
 TARGET CORPORATION
 16

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 MICHAEL J.
 BOSTROM 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 MICHAEL J. BOSTROM

I, Michael J. Bostrom, declare as follows:

I am an attorney licensed to practice law in the state of California, and admitted to the United States District Court for the Northern District of California. I am an associate in the law firm of Morrison & Foerster LLP, counsel for Defendant Target Corporation (“Target”) in this action. I have personal knowledge of the facts set forth herein. If called as a witness, I would and could competently testify as follows:

1. Attached hereto as Exhibit A is a true and correct copy of relevant portions of the transcript from the deposition of Ken Volonte taken on May 25, 2006.
2. Attached hereto as Exhibit B is a true and correct copy of relevant portions of the transcript from the deposition of Terri Uttermohlen taken on May 25, 2006.
3. Attached hereto as Exhibit C is a true and correct copy of relevant portions of the transcript from the deposition of Bob Ayala taken on May 31, 2006.
4. Attached hereto as Exhibit D is a true and correct copy of relevant portions of the transcript from the deposition of Bruce Sexton taken on May 23, 2006.
5. Attached hereto as Exhibit E is a true and correct copy of relevant portions of the transcript from the deposition of Steve Jacobson taken on May 31, 2006 .
6. Attached hereto as Exhibit F is a true and correct copy of relevant portions of the transcript from the deposition of Tina Thomas taken on May 26, 2006.
7. Attached hereto as Exhibit G is a true and correct copy of relevant portions of the transcript from the deposition of Robert Stigile taken on May 26, 2006.
8. Attached hereto as Exhibit H is a true and correct copy of relevant portions of the transcript from the deposition of Tim Elder taken on May 24, 2006.
9. Attached hereto as Exhibit I is a true and correct copy of relevant portions of the transcript from the deposition of Dr. James Thatcher taken on June 2, 2006.
10. Attached hereto as Exhibit J is a true and correct copy of Exhibit 11 to the deposition of Dr. James Thatcher taken on June 2, 2006.

1 11. Attached hereto as Exhibit K is a true and correct copy of the Order Granting
2 Summary Judgment and Order on Plaintiff's Motion to Vacate and Set Aside Judgment
3 entered in the action entitle *Hooks v. OKbridge*, SA-99-CA-214-EP (W.D. Tex. 1999).

4 12. Attached hereto as Exhibit L are relevant portions from Volume 1 of 3 of the
5 Legislative History of the Unruh Act, California Civil Code Section 50. Included are (a)
6 Worksheet, with attachments, of AB 181 as introduced, from the bill file of the Assembly
7 Committee on Judiciary, four pages (pages 148-151); (b) Senate Committee on Judiciary
8 Analysis of AB 181 as amended 5-27-87 prepared for hearing 6-2-87 (page 182); (c) Letter
9 dated April 25, 1986 from the bill file of the author, one page (page 247); and (d) Documents
10 regarding AB 4260 as amended March 31 from the bill file of the author, six pages (pages
11 251-256).

12 I declare under penalty of perjury under the laws of California and the United States of
13 America that the foregoing is true and correct, and that this declaration was executed on June
14 12, 2006 in Los Angeles, California.

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/S/
Michael J. Bostrom