

EXHIBIT F

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4
5

A rectangular stamp with the word "COPY" in bold, uppercase letters. To the left of the text is a small icon of a document with a folded corner.

6 NATIONAL FEDERATION OF THE)
BLIND, the NATIONAL FEDERATION OF)
7 THE BLIND OF CALIFORNIA, on behalf)
of their members, and Bruce F.)
8 Sexton, on behalf of himself and)
all others similarly situated,)

9)
Plaintiffs,)
10)

11 vs.)

CASE NO. C-06-1802MHP

12 TARGET CORPORATION,)
13)

14 Defendant.)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

DEPOSITION OF CHRISTINA THOMAS
LOS ANGELES, CALIFORNIA
FRIDAY, MAY 26, 2006

Reported by Charolette Martinez, CSR No. 11983
PRS Job No. 118-328422A

1 web page.

2 Q Is that because you learned -- withdraw.

3 Is that because you learned about various
4 functions available in JAWS in these classes?

5 A Yes.

6 Q You said that when you first started using
7 JAWS, you were teaching yourself how to use it and you
8 hadn't yet taken a class. Were you able to use the
9 Internet with JAWS at that time?

10 MR. BASRAWII: Objection. Vague and ambiguous.

11 You can answer.

12 THE WITNESS: Somewhat.

13 BY MR. PLUNKETT:

14 Q Could you describe your ability to use the
15 Internet with JAWS before you took classes compared to
16 after you took classes?

17 A All right. Could you repeat the question?

18 Q Yes. Could you describe your ability to use
19 JAWS to access the Internet before you took classes
20 compared to after you took classes?

21 A Well, when I -- before I took the classes, I
22 really kind of didn't know -- it was like trial and
23 error. I would do stuff -- I would just kind of go up
24 and see what I could find, and because there's some help
25 menus in JAWS, it -- it made it just a little bit

1 easier. So if I got stuck, I could go to the menus and
2 find out what key strokes I would need to use. And
3 after I took the classes, it made it a lot easier for me
4 to access content on web pages because I could find the
5 actual short cuts and I knew different ways to do -- to
6 work on trying to get onto a web page.

7 Q You said that you started off with Version 3.0
8 of JAWS and now you're up to Version 7.0; right?

9 MR. BASRAWII: Objection. Mischaracterizes
10 testimony.

11 MR. PLUNKETT: I think I'm right about that.

12 BY MR. PLUNKETT:

13 Q What version of JAWS did you start with?

14 A I started -- I started off with basically
15 roughly around 3.1.

16 Q 3.1?

17 A Yes.

18 Q And now you're using JAWS 7.0?

19 A Yes.

20 Q When you would move from one version to another
21 version of JAWS, did you notice any difference in your
22 ability to access the Internet with the new version?

23 MR. BASRAWII: Objection. Vague and ambiguous.
24 You can answer.

25 THE WITNESS: Yes. It did get easier as they

1 came out with the newer versions.

2 BY MR. PLUNKETT:

3 Q What do you remember about that specifically in
4 terms of how it got easier?

5 A It made it easier to navigate a web page.

6 Q In what way?

7 A I was able to find links a little bit quicker
8 and clearer than in the -- with -- you know, given the
9 past versions were not as good at finding the links and
10 reading certain things on the pages.

11 Q Is there anything else you can remember about
12 how it got easier to access Internet pages?

13 A No, not at this time.

14 Q Do you remember any particular version of JAWS
15 coming out and producing a significant improvement in
16 Internet accessibility?

17 MR. BASRAWII: Objection. Vague and ambiguous.
18 You can answer.

19 THE WITNESS: Rephrase -- could you repeat the
20 question, please? I'm sorry.

21 BY MR. PLUNKETT:

22 Q Yeah. Can you identify any particular version
23 of JAWS that you recall producing a significant
24 improvement in Internet accessibility?

25 A JAWS 5.

1 paragraph 16 of Exhibit 5 it states, "Upon accessing
2 Target.com on several occasions I have become frustrated
3 with inexplicable code and garbled text that has
4 prevented me from continuing to navigate through the
5 site."

6 When you say that inexplicable code and garbled
7 text prevented you from continuing to navigate through
8 the site, does that mean that you did not navigate past
9 the home page?

10 A I stayed on the home page for quite a while. I
11 couldn't get through to browse.

12 Q Did you ever get past Target.com's home page?

13 A The only way I was able to find what I was
14 looking for was I had to type into the search box and
15 then I was put on another page.

16 Q What did you type into the search box?

17 A Towels.

18 Q And then what happened?

19 A It took me to a page where they had a bunch of
20 different types of towels on the page.

21 Q And then what did you do?

22 A I started to arrow down to see which ones I
23 would like.

24 Q Did you find one that you liked?

25 A Yes.

1 Q And what did you do?

2 A I -- I clicked on the one that I wanted and I
3 wanted to try and purchase them.

4 Q Did you add the towel to your cart?

5 A Yes.

6 Q And then what happened?

7 A I went to try to purchase it and I couldn't.

8 Q Why were you unable to purchase it?

9 A Because every time I clicked on the purchase
10 button and got ready to check out, it wouldn't go.

11 Q Did you find a button on the page that was a
12 purchase button?

13 Was it a proceed-to-check-out button, if you
14 recall?

15 A I don't recall.

16 Q But you found a button on the screen that you
17 thought you needed to activate to continue with the
18 purchase?

19 A Yes.

20 Q You said that you were unable to activate the
21 button?

22 A Yes.

23 Q Can you tell me what you were doing on JAWS to
24 try to activate the button?

25 A I would push enter and nothing happened. I

1 REPORTER'S CERTIFICATE

2
3 I, Charolette A. Martinez, Certified Shorthand
4 Reporter, in and for the State of California, do hereby
5 certify:

6
7 That the foregoing witness was by me duly sworn;
8 that the deposition was then taken before me at the time
9 and place herein set forth; that the testimony and
10 proceedings were reported stenographically by me and
11 later transcribed into typewriting under my direction;
12 that the foregoing is a true record of the testimony and
13 proceedings taken at that time.

14
15 IN WITNESS WHEREOF, I have subscribed my name this
16 29th day of May, 2006.

17
18
19
20 _____
Charolette A. Martinez, CSR No. 11983