

# EXHIBIT G

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

A large, bold, black stamp with the word "COPY" in a sans-serif font, preceded by a small icon of a document with a folded corner.

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

13 vs. )

CASE NO. C-06-1802MHP

14 TARGET CORPORATION, )  
15 )  
16 Defendant. )  
17

18 DEPOSITION OF ROBERT STIGILE  
19 LOS ANGELES, CALIFORNIA  
20 FRIDAY, MAY 26, 2006  
21

22 Reported by Charolette Martinez, CSR No. 11983  
23 PRS Job No. 118-328422B  
24  
25

1 become frustrated with inexplicable code and garbled  
2 text that has prevented me from continuing to navigate  
3 through the site." At what point when you were on  
4 Target.com were you prevented from navigating through  
5 the site?

6 MR. BASRAWI: Objection. Vague and ambiguous.  
7 You can answer.

8 THE WITNESS: I'm sorry. I'm not sure I  
9 understand the question.

10 BY MR. PLUNKETT:

11 Q Where were you in the website when you were  
12 unable to navigate further due to inexplicable code and  
13 garbled text?

14 A The main page.

15 Q Did you access the main page by typing in  
16 Target.com as opposed to arriving there through a search  
17 engine?

18 MR. BASRAWI: Objection. Compound.  
19 You can answer.

20 THE WITNESS: I arrived there by Target.com.

21 BY MR. PLUNKETT:

22 Q And when you arrived on the home page of  
23 Target.com, your testimony is that you encountered  
24 inexplicable code and garbled text that prevented you  
25 from navigating past that page?

1 MR. BASRAWI: Objection. Mischaracterizes  
2 testimony.

3 THE WITNESS: The question again is?

4 MR. PLUNKETT: Read it back.

5 (Record read)

6 THE WITNESS: Yes, it is.

7 BY MR. PLUNKETT:

8 Q Can you describe for me what you encountered on  
9 the home page?

10 A There were some links were going to different  
11 areas of their website, but in order to get through to  
12 some of those links, there were a lot of different  
13 symbols and wording and things that you had to navigate.

14 Q Did you attempt to access any of the links that  
15 you found on the home page?

16 MR. BASRAWI: Objection. Vague and  
17 ambiguous.

18 THE WITNESS: I did.

19 BY MR. PLUNKETT:

20 Q What happened when you did that?

21 A It didn't seem to go to another page.

22 Q When you moved from one page of a website to  
23 another using JAWS, does JAWS announce something  
24 indicating that you're moving to another page?

25 A It will tell you -- it will start saying what

1 is on that next page.

2 Q Does your version of JAWS say something like  
3 0 percent, 100 percent when it's loading a new page to  
4 indicate that the page is fully loaded?

5 A Yes, it does.

6 Q When you were accessing -- withdraw.

7 When you were attempting to access the links  
8 off the Target's home page, did JAWS indicate to you  
9 that it was opening up another page attempting to access  
10 the links off the Target home?

11 A No, it did not.

12 Q So on any of your five or six visits to  
13 Target.com have you gone past the home page?

14 A The last couple I've been able to get past the  
15 home page.

16 Q And when were those occasions?

17 A One of them was roughly a month ago.

18 Q Was that before or after you signed your  
19 declaration, if you know?

20 A I believe it was before.

21 Q How did you get past the home page?

22 A By using several different commands between  
23 JAWS and the computer as far as the keyboard goes.

24 Q What commands did you use?

25 A I used JAWS cursor routing and a PC cursor

1 Q Did you find any barbecues when you were  
2 navigating Target.com at this time?

3 A No, I did not.

4 Q Have you ever attempted to use the search  
5 function on Target.com to find a product?

6 A Yes.

7 Q Did you attempt to use the search function to  
8 find a barbecue?

9 A Yes.

10 Q Did that work?

11 A No, it did not.

12 Q Were you able to enter "barbecue" into the  
13 search field?

14 A Yes, I was.

15 Q What happened after that?

16 A It didn't seem to move to any other page.

17 Q Do you know whether or not you activated the  
18 search function key to begin the search?

19 MR. BASRAWI: Objection. Vague and ambiguous.  
20 Calls for speculation.

21 You can answer.

22 BY MR. PLUNKETT:

23 Q I'll rephrase. Did you hit the search button?

24 A Yes.

25 MR. BASRAWI: Objection. Vague and ambiguous.

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.

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Charolette A. Martinez, CSR No. 11983