

EXHIBIT H

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

ORIGINAL

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5 NATIONAL FEDERATION OF THE) Case No.
6 BLIND, et al.,) C 06-01802 MHP
7 Plaintiffs,)
8 v.)
9 TARGET CORPORATION,)
10 Defendant.)
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13 DEPOSITION OF TIM ELDER
14 WEDNESDAY, MAY 24, 2006
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22 BY: CHRISTINE L. JORDAN, CSR NO. 12262
23 1320 ADOBE DRIVE
24 PACIFICA, CALIFORNIA 94044
25 (650) 359-3201

1 Q. Did you attempt at that time to use
2 Target.com's wedding registry to purchase the item?

3 A. I did attempt to purchase an item through
4 Target.com's wedding registry.

5 Q. And how long did you spend on Target.com
6 trying to make that purchase?

7 A. I do not specifically recall, but it could
8 have been close to an hour or longer.

9 Q. What's your best estimate or your best
10 recollection about how long it was?

11 MR. BASRAWI: Objection; asked and answered.

12 THE WITNESS: My best recollection is that it
13 was very close to an hour if not longer.

14 BY MR. PLUNKETT:

15 Q. Can you describe for me why you were unable
16 to complete the purchase off of the wedding registry on
17 Target.com?

18 A. I was unable to enter a checkout phase on the
19 website.

20 Q. Let me back up just a minute.

21 Were you able to locate the wedding registry
22 on the website?

23 A. Yes, I was able to locate the wedding
24 registry at Target.com.

25 Q. Were you able to run a search to find your

1 friend's registration on the website?

2 A. I was able to find my friend's registration
3 on the website.

4 Q. Were you able to select the item from the
5 registry that you wanted to purchase?

6 A. I had difficulty determining whether or not
7 an item I had purchased was placed in the shopping cart
8 or not.

9 Q. Can you describe that difficulty?

10 A. It would be very hard to describe the
11 difficulty, but it was difficult to navigate around the
12 site and determine if the item had been placed in my
13 cart. From my best estimate, the item had reached my
14 cart, but I was not entirely sure because the website
15 is rather hard to navigate around.

16 Q. Are you able to explain in any greater detail
17 the difficulty in determining whether the item was in
18 fact in your cart?

19 A. I cannot.

20 Q. At some point were you able to determine that
21 there was an item in the cart such that you were ready
22 to begin a checkout phase?

23 A. I was never completely confident that there
24 was an item in the cart, but I did seek to check out.

25 Q. Did you ever locate information on the screen

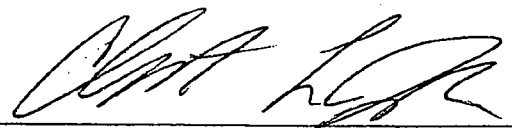
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CERTIFICATE OF REPORTER

I hereby certify that the witness in the foregoing deposition, TIM ELDER, was by me duly sworn to testify to the truth, the whole truth and nothing but the truth, in the within-entitled cause; that said deposition was taken at the time and place herein named; that the deposition is a true record of the witness's testimony as reported by me, a duly certified shorthand reporter and a disinterested person, and was thereafter transcribed into typewriting by computer.

I further certify that I am not interested in the outcome of the said action, nor connected with nor related to any of the parties in said action, nor to their respective counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 25th day of May, 2006.



CHRISTINE L. JORDAN, CSR #12262
STATE OF CALIFORNIA