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15 Attorneys for Defendant
16 TARGET CORPORATION

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 DAVE
WILKINSON 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

DECLARATION OF DAVE WILKINSON

I, Dave Wilkinson, have personal knowledge of the facts set forth below, and if called as a witness, I could and would testify under oath to the following:

1. I am 39 years old, married, and the father of a 7 year old son. I have been blind since birth.

2. I work part-time as a consultant at the access technology center for Easter Seals of Arkansas. I am also self-employed as an Assistive Technology consultant. As an Assistive Technology consultant, I provide businesses and individuals with training, insight and assistance on the use and application of Assistive Technology for business. The term Assistive Technology, as used in my field of work, refers to computer hardware and software that assists sight-impaired individuals access and use computers. Examples of assistive technology include Braille displays, scanning software, note takers and screen readers, such as JAWS For Windows ("JAWS"), or WindowEyes. A screen reader is a software product that audibly reads the content of a computer screen using a speech synthesizer.


3. I have been using computers utilizing various forms of assistive technology, including JAWS, since 1991. I currently use JAWS version 7.1. JAWS 7.1 is a Beta test version of the most recent JAWS software. JAWS 7.1 is available to the public, and can be downloaded from the web.

4. On approximately May 18, and May 19, 2006, I used JAWS 7.1 to access Target.com. I spent a little more than two and a half hours on Target.com exploring the various functions and features on the website. I was able to access Target.com, navigate the various links on the site, and search for specific products. I conducted searches on Target.com by category and department, and was able to find the specific products I was searching for. I was able to add my product selections to the Target.com virtual shopping cart, and remove items from the shopping cart that I later chose not to purchase. I was able to complete my purchase using my credit card on Target.com's checkout page. Afterwards, I received an email verification from Target.com confirming my purchase. I received the products I purchased by parcel delivery to my home address on or about on May 24, 2006.

1 5. During my visit to Target.com, I was able to navigate and use the features on
2 the site with little or no difficulty. When I did encounter an obstacle, or when a process was
3 unclear, I was able to work my way around the obstacle without any significant difficulty.

4 6. I enjoyed shopping on Target.com, and intend to use Target.com again. I
5 would recommend Target.com to my sighted and non-sighted friends. I believe sight-impaired
6 individuals with a general ability to use Assistive Technology, like JAWS, can use
7 Target.com.

8 I declare under the penalty of perjury under the laws of the United States that the
9 foregoing is true and correct.

10 Executed this 10th day of June 2006, at Little Rock, Arkansas.
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13 Dave Wilkinson
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DECLARATION OF DAVE WILKINSON (Case No. 06-01802 MHP)

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