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DISABILITY RIGHTS ADVOCATES
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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 NATIONAL FEDERATION OF THE
20 BLIND, the NATIONAL FEDERATION OF
21 THE BLIND OF CALIFORNIA, on behalf of
22 their members, and Bruce F. Sexton, on behalf
of himself and all others similarly situated,

23 Plaintiffs,

24 v.

25 TARGET CORPORATION,

26 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF LAURENCE
PARADIS IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION

Hearing Date: July 24, 2006

Time: 2:00 p.m.

Judge: The Honorable Marilyn Hall
Patel

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1 I, Laurence Paradis, declare as follows:
2

3 1. I am an attorney at the firm of Disability Rights Advocates, counsel for plaintiffs in this
4 action. I have personal knowledge of the facts set forth herein. If called as a witness, I would
5 and could competently testify as follows:

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition of
7 Charles Letourneau, taken July 5, 2006.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of
9 Robert Stigile, taken May 26, 2006.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the deposition of
11 Gregg Bodnar, taken July 6, 2006.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the deposition of
13 James Thatcher, taken June 2, 2006.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the deposition of
15 Tim Elder, taken May 24, 2006.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the deposition of
17 Steve Jacobson, taken May 31, 2006.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the deposition of
19 Chris Polk, taken June 19, 2006.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the deposition of
21 Bruce Sexton, taken May 23, 2006.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the deposition of
23 Christina Thomas, taken May 26, 2006.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the deposition
25 of Teresa Uttermohlen, taken May 25, 2006.

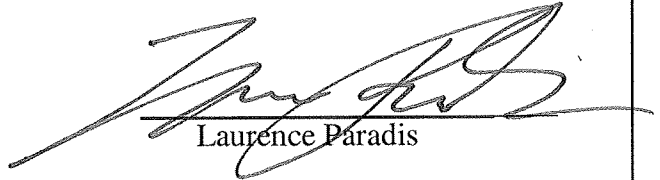
26 12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the deposition
27 of Suzanne Tritten, taken June 30, 2006.
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1 13. Attached hereto as Exhibit 12 is a true and correct copy of selected pages from
2 Starlingweb.com, a website authored by Target's expert Charles Letourneau. Mr. Letourneau
3 authenticated this document during his deposition. See Letourneau Dep. at 18:9-12.

4
5 I declare under penalty of perjury under the laws of the state of California that the foregoing is
6 true and correct.

7 Executed on July 10, 2006, in Berkeley, California.

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9 
10 Laurence Paradis

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