

EXHIBIT 2

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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NATIONAL FEDERATION OF THE)
BLIND, the NATIONAL FEDERATION OF)
THE BLIND OF CALIFORNIA, on behalf)
of their members, and Bruce F.)
Sexton, on behalf of himself and)
all others similarly situated,)
)
Plaintiffs,)
)
vs.	CASE NO. C-06-1802MHP)
)
TARGET CORPORATION,)
)
Defendant.)
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DEPOSITION OF ROBERT STIGILE
LOS ANGELES, CALIFORNIA
FRIDAY, MAY 26, 2006

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

00030

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

00034

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.

00039

1 Q Have you sought the assistance from Target or
2 have you brought someone with you?

3 A I have asked for assistance.

4 Q And has Target provided that -- withdraw.

5 Has Target provided that service to you when
6 you've gone to the store and asked for it?

7 A Yes, they have.

8 Q Have you ever attempted to contact Target.com
9 when you encountered difficulties accessing the website?

10 A When you say "difficulties," you mean --

11 Q The difficulties that we've talked about.

12 A Okay. No, I have not.

13 Q Did you ever look on the Target.com site for
14 Target.com contact information?

15 A Yes, I did.

16 Q When did you do that?

17 A Each time I've been to Target.com.

18 Q And what was your purpose for looking for the
19 contact information?

20 A To try and contact them since I was having
21 problems with the website.

22 Q Did you find contact information on the
23 website?

24 A No, I did not.

25 Q Did you find a link on the home page called

00040

1 "contact us"?

2 A No, I did not.

3 Q Did you look on the home page for a link called

4 "contact"?

5 A I did.

6 Q How did you go about looking for that?

7 A I went through the home page with the arrow
8 keys, navigating through like I normally would.

9 Q You navigated through all the links?

10 A I try.

11 Q Are you able to search using JAWS -- withdraw.

12 Are you able to use JAWS to search for a
13 particular link on a web page?

14 A Yes.

15 Q Did you attempt to conduct a search for the
16 word "contact" on Target.com?

17 A I did.

18 Q What happened?

19 A I didn't seem to find anything.

20 Q Did you attempt to obtain any information about
21 Target.com's contact information using the telephone?

22 A No, I did not.

23 Q Do you recall any other features on Target.com
24 that you have tried to access?

25 A Yes, I do.