EXHIBIT 6

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00001
  1                  UNITED STATES DISTRICT COURT
                   NORTHERN DISTRICT OF CALIFORNIA
  2                   SAN FRANCISCO DIVISION
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     NATIONAL FEDERATION OF THE
  4  BLIND, the NATIONAL FEDERATION OF
     THE BLIND OF CALIFORNIA on behalf
  5  of their members, and BRUCE F.
     SEXTON on behalf of himself and
  6  all others similarly situated,
  7                          Plaintiffs,
  8                              Court File No. C 06-01802  (MHP)
  9              -vs-
 10  TARGET CORPORATION,
 11                          Defendant.
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 14          The Deposition of STEVEN JACOBSON, taken in the
 15  above-entitled matter, pursuant to Notice, before Gail M.
 16  Hinrichs, RPR and Notary Public, at 710 Marquette Avenue,
 17  Bear River Conference Room, in the City of Minneapolis,
 18  County of Hennepin, State of Minnesota, on the 31st day of
 19  May, 2006, commencing at approximately 9:40 a.m.
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00051
  1    labeled.
  2   BY MR. PLUNKETT:
  3          Q.   Then after conducting the search, did you have
  4   any difficulties reviewing the search result list?
  5          A.   Not other than going down through quite a few
  6   of the links that had numbers and letters that I mentioned
  7   until I got down to the point where there were product
  8   results.
  9          Q.   So once you got to the point where there were
 10   product results, you were able to review the different
 11   products available at Target?
 12          A.   As I recall, yes.
 13          Q.   Do you recall how long it took you to get to
 14   the point on the page where you could review the product
 15   results?
 16          A.   Oh, the first few times it took quite a bit,
 17   probably a few minutes.  I believe I -- yeah.  Again,
 18   because of the number of links at the time that were
 19   letters and numbers.  And not knowing for sure which of
 20   those were significant.
 21          Q.   How do you go about getting past those?  Do
 22   you tab past them or arrow past them?
 23          A.   Yes, but the first -- the first time you need
 24   to at least -- you don't know if a link is going to be
 25   meaningful until you've listened to it.  So at least the
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00057

1   A.   I don't remember for certain. There could
2   have been a create an account and I may have had to enter
3   an existing account. I'm not clear on what happened
4   there.
5   Q.   But you wound up on a page where it asked for
6   shipping information?
7   A.   Yes.
8   Q.   Is that the page where you experienced
9   difficulties?
10   A.   Yes, as I recall.
11   Q.   What happened on that page?
12   A.   The problem I ran into was not being able to
13   figure out a way to continue the process from that point.
14   It occurred to me there was still either a proceed to
15   checkout button or link on that page, so I thought perhaps
16   that needed to be used again. But it just caused that
17   current page to refresh, and I could find no way of
18   getting around it.
19   I finally asked someone else with vision in
20   the family to look at that page to see if they could tell
21   what I should do next. And as I recall, there was a
22   second button that was labeled continue checkout or
23   something along those lines that needed to be clicked.
24   Since February 8, you know, I was aware at
25   that point, since there had been a press release and so

00058
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 1    forth, that there was activity with Target having to do
 2    with this case, I was very -- wanted to make very sure I
 3    understood what was going on.  And the person who assisted
 4    me found that button, showed me physically by moving the
 5    mouse there where that button was, but there was no
 6    indication whatsoever by my screen reader that there was a
 7    button there.  It wasn't just unlabeled, but the button
 8    itself wasn't present.  A screen reader will tell you if
 9    an unlabeled button is present.  And I believe at that
10    point I also switched to JFW, that was where I did my
11    comparison to see if the button was found there.
12         Q.   Was it?
13         A.   No, it was not with either one.
14         Q.   How long did you spend on that page with JAWS?
15                   MS. ROBERSON:  Objection, asked and
16    answered.
17    BY MR. PLUNKETT:
18         Q.   I'm talking about this particular page, not
19    the entire site.
20         A.   I would guess perhaps ten minutes.
21         Q.   And what did you do with JAWS on that page?
22         A.   Examined the page very carefully with the
23    virtual cursor, tabbed through it in which there were
24    cases in which the tab order included information that I
25    may have missed with the virtual cursor.  And I did the
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