

1 LAURENCE W. PARADIS (California Bar No. 122336)
lparadis@dralegal.org
2 MAZEN M. BASRAWI (California Bar No. 235475)
mbasrawi@dralegal.org
3 DISABILITY RIGHTS ADVOCATES
2001 Center Street, Third Floor
4 Berkeley, California 94704
Telephone: (510) 665-8644
5 Facsimile: (510) 665-8511
TTY: (510) 665-8716

6 TODD M. SCHNEIDER (California Bar No. 158253)
tschneider@schneiderwallace.com
7 JOSHUA KONECKY (California Bar No. 182897)
jkonecky@schneiderwallace.com
8 SCHNEIDER & WALLACE
180 Montgomery Street, Suite 2000
9 San Francisco, CA 94104
Telephone: (415) 421-7100
10 Fax: (415) 421-7105
11 TTY: (415) 421-1655

12 DANIEL F. GOLDSTEIN (*pro hac vice*)
dfg@browngold.com
13 BROWN, GOLDSTEIN & LEVY, LLP
120 E. Baltimore St., Suite 1700
14 Baltimore, MD 21202
Telephone: (410) 962-1030
15 Fax: (410) 385-0869

DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CALIFORNIA 94704-1204
510.665.8644

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 HEATHER AKERS-
HEALY IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Hearing Date: July 24, 2006

Time: 2:00 p.m.

Judge: The Honorable Marilyn Hall
Patel

27
28

1 I, Heather Akers-Healy, declare as follows:

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

5 2. Attached hereto as Exhibit A is a true and correct copy of the "Target Weekly Ad" for zip
6 code 94704 on <http://weeklyad.target.com>, which I printed directly from the website on July 6,
7 2006.

8 3. Within a month's time from May 19, 2006 through June 22, 2006, over 113 pages of such
9 weekly ads appeared on target.com.

10

11 I declare under penalty of perjury under the laws of the state of California that the foregoing is
12 true and correct.

12

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

14


Heather Akers-Healy

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CALIFORNIA 94704-1204
510.665.8644