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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

**AMENDED 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:

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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. Exhibits were inadvertently omitted from the filing of my declaration on July 10, 2006
7 and have now been added to this amended declaration. Please reference the corrected exhibit list
8 below.

9 3. These pages were also inadvertently omitted and have now been added to the following
10 exhibits: Page 113, Exhibit 1; Pages 116 through 117, Exhibit 3.

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

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

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

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

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

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

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

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

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

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

3 14. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the deposition
4 of Suzanne Tritten, taken June 30, 2006.

5 15. Attached hereto as Exhibit 12 is a true and correct copy of selected pages from
6 Starlingweb.com, a website authored by Target's expert Charles Letourneau. Mr. Letourneau
7 authenticated this document during his deposition. See Letourneau Dep. at 18:9-12.

8 16. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the deposition
9 of Dawn Wilkinson, taken June 21, 2006.

10 17. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from the deposition
11 of David Wilkinson, taken June 21, 2006.

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

15 Executed on July 11, 2006, in Berkeley, California.

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17 /s/ Laurence Paradis
18 Laurence Paradis

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