

EXHIBIT 14

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 NATIONAL FEDERATION OF THE BLIND,)
5 the NATIONAL FEDERATION OF THE)
6 BLIND OF CALIFORNIA, on behalf of)
7 their members, and Bruce F. Sexton,))
8 on behalf of himself and all others)
9 similarly situated,)

10 PLAINTIFFS)

11 V.) NO. C06-01802 MHP

12)

13 TARGET CORPORATION,)

14 DEFENDANT)

15 ORAL DEPOSITION OF

16 DAVID HENRY WILKINSON

17 TAKEN IN LITTLE ROCK, ARKANSAS

18 JUNE 21, 2006

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22 ATKINSON-BAKER, INC.

23 COURT REPORTERS

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1 part of what I marketed was training. And as a result
2 of that, we were interested to see how people were using
3 the Internet to conduct training seminars. And as a
4 result of that, I was enrolled in an HTML course,
5 basically to see how it worked, how stable the
6 environment was to see if a class, at that point in
7 time, could be effectively conducted over the Internet.

8 Q And what was the -- your feeling about that
9 afterwards? I mean, what -- what did you gain from this
10 experience?

11 A I'm frankly not sure if I gained much of anything.

12 Q Okay.

13 A I saw it work, and I saw it crash a lot. And it
14 convinced me that, at that point, it wasn't something
15 that we should be pursuing until technology caught up
16 with the concept a bit more.

17 Q Okay. Beginning -- can you please describe your
18 job history, beginning with your current job and going
19 backwards?

20 A I currently am a Low Vision Consultant for Easter
21 Seals of Arkansas. I also am an Assistive Technology
22 Consultant. I do a number of different little projects
23 here and there and everywhere. Before that, I was a
24 Sales Manager for Freedom Scientific. I'm sorry, I
25 skipped a job. I was an Assistive Technology Instructor

1 at Lion's World Services for the Blind in Little Rock,
2 which is a vocational rehabilitation center. Before
3 that, I was a Sales Manager at Freedom Scientific.
4 Before that, I was a Sales Manager for Bartemaes Group,
5 and I was a Sales Manager and the entire sales force.
6 Before that, I was a Residence Hall Director at American
7 University with a building of several hundred freshman
8 and sophomores under my leadership and guidance.
9 Previous to that, I was a Residence Hall Director at
10 Salem State College in Salem, Massachusetts. The same
11 type of position, but a smaller school, state-run
12 instead of private. Continuing backwards, now we're to
13 the college years. I had an internship in the Program
14 Office at the New York University Office of Student --
15 Center for Student Activities or whatever it was called,
16 where we planned a lot of events that were brought onto
17 campus and satisfied the entertainers, negotiated the
18 contracts, etcetera. I had a position as a desk clerk
19 as I worked my way through my undergrad degree. I have
20 tuned pianos. I have worked in a music library. And
21 I've worked in a photocopy shop. And I've probably left
22 something out in there. I also brailled texts for a
23 deaf/blind individual while at NYU, for a couple of
24 years.

25 Q Okay. Can you give me the dates for these jobs?

1 who wasn't home and whom I wouldn't have asked anyway.
2 The point was, I wanted to look around the website and
3 see what I could find, so I did.

4 Q Okay. You say in your declaration that you
5 encountered obstacles on target.com. Do you recall what
6 those obstacles were?

7 A Certainly a link that doesn't tell me where it's
8 going to go is a barrier to being able to get there. I
9 also -- well, I'm trying to think if that's -- that's
10 Target-specific. I think that it would be great if
11 those links -- I mean, if that -- if -- I'm -- and it
12 would be nice if they were labeled specifically. Could
13 it be probably designed a bit better? Okay. But it
14 certainly didn't keep me from using the site.

15 MR. BASRAWI: I'm sorry. Can you read back
16 that last answer, please?

17 COURT REPORTER: Answer, "Certainly the
18 link that doesn't tell me where it goes is a
19 barrier to being able to get there. I also
20 know -- I'm trying to think if those are
21 Target-specific. And it would be great if
22 those links -- it would be nice if they were
23 labeled. Could it be designed a bit better?
24 Okay. As for that, it didn't keep me from
25 using the site."

1 please.

2 MR. PLUNKETT: Okay.

3 (WHEREUPON, a short break was taken, after
4 which deposition proceedings resumed as
5 follows, to-wit:)

6 MR. BASRAWI: Okay. Back on the record?

7 COURT REPORTER: Yes.

8 BY MR. BASRAWI:

9 Q Mr. Wilkinson, I have a couple more questions.

10 One. How long did it take you to get to your current
11 level of proficiency with screen reader use?

12 MR. PLUNKETT: Objection. Vague.

13 BY THE WITNESS:

14 A I'm frankly not sure. I've been using screen
15 readers, as you know, for quite a long time, but I'm --
16 I'm not really sure. It's been an ongoing -- it's been
17 an ongoing process.

18 BY MR. BASRAWI:

19 Q Okay. Do you know how long it would take someone
20 who is just starting to learn how to use a screen reader
21 -- how long to get to your level of proficiency?

22 MR. PLUNKETT: Objection. Vague. Calls
23 for speculation.

24 BY THE WITNESS:

25 A I'm frankly not sure what my level of proficiency

1 A I'm not sure what my level of proficiency is. I
2 believe they've reached -- I believe that some people,
3 in varying degrees of time, depending on their interest,
4 ability, and willingness to work at it, will be able to
5 get to where they need to be, using a computer.

6 Q Do you believe that someone who's learning, who
7 took several weeks or months to learn how to use a
8 screen reader for the first time, is qualified to be a
9 consultant in access technologies?

10 MR. PLUNKETT: Objection. Incomplete
11 hypothetical. Vague. Calls for speculation.

12 BY THE WITNESS:

13 A I believe we established earlier that I have more
14 of a breadth of knowledge of specific devices that may
15 be useful than someone who is going through classes and
16 learning how to use -- how to use a screen reader.

17 MR. BASRAWI: Okay. No further questions.

18 (WHEREUPON, there being no further
19 questions the deposition concluded at 12:15
20 p.m.)

21 *****

22 WITNESS EXCUSED

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