

EXHIBIT 3

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16

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION
20

21 NATIONAL FEDERATION OF THE BLIND,
the NATIONAL FEDERATION OF THE
22 BLIND OF CALIFORNIA, on behalf of their
members, and Bruce F. Sexton, on behalf of
23 himself and all others similarly situated,

24 Plaintiffs,

25 v.

26 TARGET CORPORATION,

27 Defendant.
28

Case No. C06-01802 MHP

**DECLARATION OF PAMELA
MCGLONE IN SUPPORT OF
TARGET CORPORATION'S
OPPOSITION TO PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Date: July 24, 2006

Time: 2:00 p.m.

Judge: The Honorable Marilyn Hall Patel

DECLARATION OF PAMELA MCGLONE

I, Pamela McGlone, declare as follows:

I have personal knowledge of the facts set forth herein. If called as a witness, I would and could competently testify thereto.

1. I am a Senior Account Manager at NCO Customer Management Ltd. I am in charge of NCO's account with Amazon.com. NCO partners with Amazon.com, which hosts Target Corporation's website, to provide customer service for callers with questions regarding Target.com.

2. I understand that Bruce Sexton submitted a declaration describing a phone call with a customer service representative who assisted him with questions regarding Target.com at approximately 1:00 a.m. on June 23, 2006. I have reviewed the records of this call and have spoken with the customer service representatives involved.

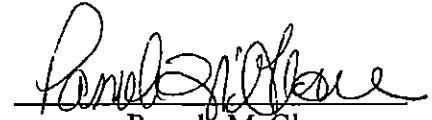
3. Mr. Sexton first spoke with Vinson, a customer service representative in our Vancouver call center. Mr. Sexton spoke with Vinson for 1 hour and 20 minutes. The call, like all outside calls received by the call center, was recorded. After 1 hour and 8 minutes, Vinson was asked by his supervisor, Terry, the reason he had been on an unusually lengthy call. At that time of night, Vinson represented 25% of the staff available to take Target.com calls, and a queue of other callers had developed. When Vinson explained that Mr. Sexton was blind and was asking for help shopping on Target.com, Terry suggested that Vinson help Mr. Sexton with a few more items and then ask Mr. Sexton to call back to continue his shopping when more representatives were available to help.

4. After 1 hour and 20 minutes, Vinson transferred Mr. Sexton to Terry. The call was not recorded after the transfer, because internal transfers trigger the recording system to stop. Terry proceeded to assist Mr. Sexton to shop on Target.com for at least an additional 40 minutes. Thus, Mr. Sexton's call lasted a total of at least 2 hours.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 18th day of July, 2006, at Seattle, Washington.



Pamela McGlone