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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

18 NATIONAL FEDERATION OF THE
19 BLIND, the NATIONAL FEDERATION OF
20 THE BLIND OF CALIFORNIA, on behalf of
their members, and Bruce F. Sexton, on behalf
of himself and all others similarly situated,

21 Plaintiffs,

22 v.

23 TARGET CORPORATION,

24 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF ROBERT STIGILE
IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION

Date: April 12, 2007

Time: 2:30 p.m.

Judge: Honorable Marilyn H. Patel

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1 I, Robert Stigile, declare as follows:
2 1. The facts in this declaration are based upon my personal knowledge. If called to testify,
3 I could testify competently to the facts described in this declaration.
4 2. I am 40 years old.
5 3. I have been legally blind for more than 20 years.
6 4. I reside in Reseda, California.
7 5. I have been a member of the National Federation of the Blind (NFB) since 1988. The
8 NFB has affiliates in all fifty states plus Washington, D.C. and Puerto Rico.
9 6. The National Federation of the Blind of California (NFB-C) is a state affiliate of the
10 NFB. NFB-C was founded in 1935 as the California Council of the Blind, and became NFB-C
11 in 1978. The NFB-C is a California corporation that carries out the NFB's objectives at the state
12 level. Like the NFB, the NFB-C aims to promote the general welfare of the blind by helping
13 them integrate into society on equal terms and removing the barriers that deny them
14 opportunities in virtually every sphere of life.
15 7. The NFB-C has approximately 300-400 members. The vast majority of the NFB-C's
16 members are blind persons.
17 8. I have been a member of the NFB-C since 1988, and am currently the President of the
18 NFB-C. The NFB-C has dozens of local chapters and affiliates throughout the state of
19 California, including in Alameda County.
20 9. The internet is becoming increasingly important to the day to day lives of sighted and
21 blind Americans alike. Over the years, the NFB-C has become increasingly concerned that blind
22 people are being denied, to their detriment, equal access to the internet and everything that
23 comes with that. NFB-C joined this litigation as a named plaintiff and proposed class
24 representative because it is concerned, as an organization and on behalf of its members, that the
25 barriers which make Target.com and other websites inaccessible are preventing blind people,
26 including NFB-C members, from fully participating in society and the economy.
27 10. The NFB-C has joined the above captioned case on behalf of its members, and is fully
28 committed to protecting the interests of its members in this case. Moreover, if appointed a class

1 representative by the Court, the NFB-C will represent the interests of the entire class vigorously,
2 diligently and faithfully, in the same way it will strive to represent the interests of its members.

3
4 I declare under penalty of perjury under the laws of the United States of America that the
5 forgoing is true and correct.

6 Executed on 1/26, 2007, at Reseda, California.

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10 _____
11 ROBERT STIGILE
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