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

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

23 Plaintiffs,

24 v.

25 TARGET CORPORATION,
26 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

APPENDIX OF ADDITIONAL CLASS
MEMBER DECLARATIONS

Date: April 12, 2007

Time: 2:30 p.m.

Judge: Honorable Marilyn H. Patel

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1 APPENDIX OF ADDITIONAL CLASS MEMBER DECLARATIONS

- 2 A. Bailey, Janice
- 3 B. Bruns, Michelle
- 4 C. Clegg, Eric
- 5 D. Crowley, Robert
- 6 E. Czarnecki, Charlotte
- 7 F. Dillon, Shannon
- 8 G. Dunnam, Jennifer
- 9 H. Lewis, Anil
- 10 I. Martinez, Lisamaria
- 11 J. McNally, Elizabeth
- 12 K. Morais, Maria
- 13 L. Peterkin, Olga
- 14 M. Porter, Joyce
- 15 N. Sanders, Judith

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EXHIBIT A

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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
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20 NATIONAL FEDERATION OF THE
21 BLIND, the NATIONAL FEDERATION OF
22 THE BLIND OF CALIFORNIA, on behalf of
their members, and Bruce F. Sexton, on behalf
23 of himself and all others similarly situated,

24 Plaintiffs,

25 v.

26 TARGET CORPORATION,
27 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF JANICE BAILEY IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION

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1 I, Janice Bailey, 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 **Background**

5 2. My name is Janice L. Bailey, and I was born February 19, 1951.

6 3. I have been totally blind since I was eight years old. I had retinopathy of prematurity
7 shortly after birth.

8 4. I work as a Rehabilitation Counselor at the Minnesota State Services for the Blind.

9 5. My primary residence is in Rochester, Minnesota.

10 6. I have been a member of the National Federation of the Blind since 1978.

11 **Computer and Internet Use**

12 7. I have used computers since 1993. I would say I am an intermediate user though I use
13 computers frequently.

14 8. I have accessed the Internet since 1999. I use the Internet to send and receive e-mail,
15 search for information, shop online, among other tasks.

16 9. I have used JAWS screen-reading software since 1993. As a blind person, I can
17 confidently say that screen-reading software has made me much more independent. I can now
18 read about any subjects that interest me, such as manuals, procedures, or recipes, by accessing
19 web sites online. I generally shop online by myself. I communicate with friends and family via e-
20 mail. Access to a human reader no longer limits my ability to participate in many of these
21 activities.

22 10. When web sites are properly coded, I can access them. I regularly use the web sites of
23 various companies such as eBay, KROC radio, Google, and Cooks.com. Target.com is one of the
24 worst web sites I have tried to use.

25 **Experience with Target Retail Stores**

26 11. My friends, family, and I use Target retail stores. I have visited Target stores at least five
27 times in the last two years. I like Target because I believe they carry quality products at

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1 reasonable prices. I am interested in buying merchandise at Target.

2 **Harms Experienced Because of the Inaccessibility of Target.com**

3 12. If I am given the opportunity to shop online, I do so. An important feature of online
4 shopping is that it conveniently allows me to comparison shop products by price.

5 13. However, if Target.com were easily accessible, I would definitely use it in connection
6 with my future visits to Target’s retail stores. The web site would allow me to preview products
7 available in physical stores.

8 14. I would like to shop at Target.com because I believe Target often carries the lowest price
9 for products I want to buy. I would also like to access the sales and coupons on Target.com. It
10 would be nice to be able to select Target products as gifts for friends by myself and then have
11 them mailed directly to the recipient. As a blind person, I believe this would save me a lot of
12 time and effort.

13 15. It is inconvenient for me to travel to a physical Target store. It would take an hour to
14 travel one way to Target on the bus since we do not have good bus service here in Rochester. It
15 is too expensive to take a taxi to Target. It is also inconvenient to ask someone to take me to
16 Target because fitting their schedule to mine often takes several weeks.

17 16. I have attempted to use Target.com on two separate occasions. The first time was about
18 two years ago, and the second was about one year ago. I have spent thirty minutes using
19 Target.com. I have not revisited the site since the last time because I do not want to waste my
20 time by browsing inaccessible sties.

21 17. I found inexplicable code and garbled text prevented me from navigating the site.

22 18. Target.com contained links and images without labels indicating what they were or what
23 they did. There was a lot of “junk” on the page that did not mean anything. Words like “GIF”
24 and “image” do not help me identify what a product is or does. My use of Target.com involved
25 essentially trial and error.

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1 19. I was completely unable to locate the Continue to Checkout button. To search for this
2 button, I examined the page line-by-line and used several techniques within the JAWS screen-
3 reader software.

4 20. When I last accessed Target.com, I had reason to believe that a particular product I
5 wanted was sold at the lowest price there. After significant effort of finding the product, I found
6 that I was unable to checkout. This was very frustrating. My experience with Target.com filled
7 me with total disgust.

8 21. I do not believe Target.com treats me the same as it treats a sighted individual since I
9 cannot purchase products.

10 22. Lack of access on Target.com compromised my independence and forced me to rely on
11 others. For instance, now I have to ask a friend to take me to Target on her schedule, and as a
12 result, I miss sales.

13 23. My hope is that Target will make and keep its website fully and easily accessible for the
14 blind so that I can shop the website just as sighted people do.

15
16 I declare under penalty of perjury under the laws of the United States of America that the
17 forgoing is true and correct.

18 Executed this December day of 18., 2006, at Rochester, Minnesota.

19
20
21  JANICE BAILEY

EXHIBIT B

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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
23 of himself and all others similarly situated,

24 Plaintiffs,

25 v.

26 TARGET CORPORATION,
27 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF MICHELLE BRUNS
IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION

1 I, Michelle Bruns, 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
5 **Background**

6 2. My name is Michelle Bruns, and I am 29 years old.

7 3. I have been legally blind since 1994.

8 4. I am the Assistant Director of Programs for the Society for the Blind, a non-profit
9 organization in Sacramento, California. Apart from my work with the Society, I have a private
10 practice in psychotherapy.

11 5. My primary residence is in Sacramento, California.

12
13 **Computer and Internet Use**

14 6. I have used computers for roughly twenty years, and I believe that I am a proficient user.

15 7. Since 1995, I have used the Internet to keep in touch with friends, conduct research, shop,
16 take care of my banking needs, read the news, among other activities.

17 8. I have used JAWS screen-reading software for ten years. Screen-reading software is the
18 key to my independence, both in terms of my personal and professional capacities. I depend on it
19 to carry out essential tasks in my life.

20 9. When web pages are properly coded, I can access them. I regularly use the web pages of
21 Google, MSN, CNN, The Gap, and Old Navy. When comparing Target's web page to others, I
22 believe that Target.com was one of the worst.

23
24 **Experience with Target Retail Stores**

25 10. Target is the closest retail store to my home. Like my friends and family, I prefer to shop
26 at Target. Target products are high quality and affordable, and they meet my basic needs nicely.

27

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1 11. I must use a local bus to reach the nearby Target store. Otherwise, I must ask my friends
2 or family to drive me to the store.

3
4 **Harms Experienced Because of the Inaccessibility of Target.com**

5 12. Since I am blind, I like to enjoy the benefits that accompany online shopping. I prefer to
6 use the web page of a store to get a sense of available products before I visit the store's physical
7 location.

8 13. As such, I would like to use Target.com because I want to get a better sense of what
9 products are available before I spend the time to go to the physical store. Moreover, when I use
10 search engines to comparison shop products by price, I believe Target.com often provides the
11 best price.

12 14. I have attempted to use the Target web page about ten times. At first, I spent roughly
13 ninety minutes trying to decipher the site. The last time I visited the site was in approximately
14 June 2006. Though I am a competent Internet user, I found using the site to be frustrating.

15 15. I found that Target.com home page lacked labels so that I could not decipher what objects
16 were on the page.

17 16. After attempting to delve deeper into the page, I found that that web sites had long lists of
18 categories without any usable links. Since the lists were not hyperlinked, I found that I could not
19 navigate the page any further. For instance, I was able to notice the categories of products, such
20 as those for Men, Women, or Gifts. However, once I get past those categories, I was unable to
21 navigate the page. I was unable to access product information or proceed to checkout.

22 17. My friends have used Target.com to coordinate their baby showers and gift registries. I
23 was disappointed to discover that I could not purchase gifts for these events due to the
24 inaccessibility of Target.com.

25 18. I believe that Target.com treated me differently than it treated sighted people because I
26 was unable to take advantage of its features.

27 19. My experiences with Target.com made me feel frustrated and annoyed.

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20. The lack of access to Target.com compromised my independence and forced me to rely on others for specific aspects of my shopping needs.

21. My hope is that Target will make and keep its website fully and easily accessible for the blind so that I can shop the website just as sighted people do.

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

Executed this December day of ____, 2006, at Sacramento, California.

Michelle Bruns

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EXHIBIT C

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL FEDERATION OF THE
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their members, and Bruce F. Sexton, on behalf
of himself and all others similarly situated,

Plaintiffs,

v.

TARGET CORPORATION,
Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF ERIC CLEGG IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION

1 I, Eric Clegg, 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
5 **Background**

6 2. My name is Eric Clegg. I was born May 20, 1947.

7 3. I was born visually impaired. I have been totally blind for twenty years.

8 4. My primary residence is in Sacramento, California.

9 5. I work for the Department of Rehabilitation as a Braille production specialist.

10 6. I have been a member of the National Federation of the Blind since 1973.

11
12 **Computer and Internet Use**

13 7. I am a proficient user of computers. I can use most programs and access most web sites. I
14 have used computers since 1979.

15 8. I have accessed the Internet since 1995. I use the Internet to e-mail, shop, and research
16 information.

17 9. I have used both JAWS and Window Eyes screen-reading software since 1995. Screen-
18 reading software has been a quantum leap for my independence. I would have much more
19 trouble banking, shopping, and doing other essential tasks without such programs.

20 10. Generally, proper coding of web pages allows me to access content on these sites. I can
21 readily access the web pages of companies such as Google, Tower Records, Wells Fargo,
22 Safeway, Trader Joe's, Albertsons, and Food To You. Target.com is one of the least accessible
23 web pages I have used. The vast majority of web pages I have come across have been more
24 accessible than Target.com.

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Experience with Target Retail Stores

11. I shop at Target for household necessities and general merchandise. I like Target products.

Harms Experienced Because of the Inaccessibility of Target.com

12. I want to shop at Target.com because I think the site might have good sales and coupons.

13. I would prefer to shop at Target.com rather than a physical Target store. It takes me about 30-40 minutes to commute to a physical store. Secondly, I would like to use online stores to preview available items before I go into physical stores. I also use them to search for bargains.

14. I have accessed Target.com two or three times within the last three months. During these visits, I searched for items and attempted to check out. My attempts were unsuccessful. During my visit in September 2006, I spent twenty minutes on the web site.

15. Inexplicable code and garbled text prevented me from navigating the site. Target.com contained links and images without labels indicating what they were or what they did. My screen-reading software would say "image image" or "graphic graphic," but it could not find a description of the item.

16. Target.com had unlabelled forms that required me to input information.

17. Target.com did not have headings so I could skim the contents of the web page.

18. I could not find the "Continue to Checkout" button with either screen-reader or keyboard commands. I had no indication that it was on the page since JAWS could not locate this button with its button-finding command.

19. Target did not treat me the same as it treats sighted people because I could not complete a transaction.

20. The lack of access on Target.com compromised my independence and forced me to rely on others for some of my shopping needs.

21. My hope is that Target will make and keep its website fully and easily accessible for the blind so that I can shop the website just as sighted people do.

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

Executed this December day of 7, 2006, at Sacramento, CA.


ERIC CLEGG

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EXHIBIT D

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21 BLIND, the NATIONAL FEDERATION OF
22 THE BLIND OF CALIFORNIA, on behalf of
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24 Plaintiffs,

25 v.

26 TARGET CORPORATION,
27 Defendant.
28

Case No.: C 06-01802 MHP

CLASS ACTION

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

DISABILITY RIGHTS ADVOCATES
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510.665.8644

1 I, Robert Crowley, 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
5 **Background**

- 6 2. My name is Robert Edward Crowley, Jr. I was born June 30, 1958.
- 7 3. Due to vascular inclusion, I have been legally blind since October 2002.
- 8 4. I decided to go back to school, and I am currently a student of political science.
- 9 5. I reside in Windsor, New York.
- 10 6. I have been a member of the National Federation of the Blind for the past year.

11
12 **Computer and Internet Use**

- 13 7. I am a proficient computer user. I have used computers for at least one decade.
- 14 8. I have used the Internet for nine years. I currently use it for shopping, banking, academic
15 research, among other activities.
- 16 9. I have used JAWS 7.0 screen-reading software for two and a half years. Screen-reading
17 software has made me much more independent because I can perform important functions in my
18 life with it that I could not do without it. After I become blind but before I had JAWS, I avoided
19 computers and thus I did not shop, bank, or do research online.
- 20 10. If web sites are properly coded, I can use them. I regularly use the web pages of my
21 college, MSN, Walmart, and Bank of America. Target's web page is not as accessible as other
22 web pages I use. The majority of pages I have come across are more accessible than Target.com.

23
24 **Experience with Target Retail Stores**

25 11. I have a strong interest in purchasing Target products. Since I live in a rural area, Target
26 is one of the closer stores as it is about twenty miles from where I live. My friends, family, and I
27 shop at Target, and I like that their stores are spacious so that I do not walk into items as often.

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1 Their products are of good quality, and their prices are competitive.

2 **Harms Experienced Because of the Inaccessibility of Target.com**

3 12. I prefer to shop online so that I can carefully compare prices for products I want to buy. I
4 believe Target.com provides coupons and sales, and I would like access to these benefits.

5 However, if Target.com were easily accessible, I would also definitely use it in connection with
6 my future visits to Target's retail stores.

7 13. It is inconvenient for me to travel to the physical Target stores. I cannot drive myself, and
8 there are no cabs or buses where I live. I have to wait for a friend's schedule to match my own.

9 Once I find someone, it takes about thirty minutes to travel there and thirty minutes to travel
10 back.

11 14. I have attempted to use Target.com a half a dozen times between October 2004 and
12 August 2006. The last time I tried to access the site, I spent about thirty minutes doing so.

13 15. The last time I visited the site, in August 2006, I tried to purchase golf balls. I searched
14 for roughly thirty minutes, but I was unable to find these items on the site. This made me feel
15 frustrated and stupid because I am confident a sighted person could find similar products with
16 ease.

17 16. Inexplicable code and garbled text prevented me from navigating the site. I could not
18 make out what information the page was presenting or how to navigate it.

19 17. Target.com had links and images without labels indicating what they were or what they
20 did. Sometimes the site listed twenty some odd links of random sayings and letters, and these
21 links lacked substantive description.

22 18. Target.com did not use headings in a way that allowed me to skim the contents of the
23 web page.

24 19. I could not find or use the button Continue to Checkout.

25 20. I felt that Target.com did not treat me the same as it treats a sighted individual.

26 21. Lack of access to Target.com compromised my independence and forced me to rely on
27 others. If I cannot access it, then I need someone else to help me or purchase products for me.

1 22. It is my hope is that Target will make and keep its website fully and easily accessible for
2 the blind so that I can shop the website just as sighted people do.

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 this December day of 18, 2006, at Windsor, New York.

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9 ROBERT CROWLEY

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EXHIBIT E

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

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

24 Plaintiffs,

25 v.

26 TARGET CORPORATION,
27 Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF CHARLOTTE
CZARNECKI IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION

1 I, Charlotte Czarnecki, 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
5 **Background**

6 2. My name is Charlotte Czarnecki, and I was born June 16, 1972.

7 3. I have been totally blind since birth due to congenital glaucoma.

8 4. I reside in Minneapolis, Minnesota.

9 5. I am a vocational rehabilitation counselor.

10 6. I have been a member of the National Federation of the Blind since 1996.

11
12 **Computer and Internet Use**

13 7. I have used computers since 1997. Since I can use the programs and web sites I need, I
14 would say I am a proficient computer user.

15 8. I have accessed the Internet since 1999. I use the Internet for shopping, doing research,
16 sending e-mail, reading the news, among other tasks.

17 9. I have used JAWS screen-reading software since 1997. Screen-reading software allows
18 me to use computers and access information on the screen and perform important functions in
19 my life.

20 10. When web sites are properly coded, I can use them. I regularly use the web sites of CNN,
21 the Star Tribune, Simon Delivers (a grocery shopping site), and Travelocity. A majority of web
22 pages I have come across are more accessible than Target.com.

23
24 **Experience with Target Retail Stores**

25 11. My friends, family, and I use Target retail stores. I like shopping at Target because I like
26 the store's products. I believe they are high quality and affordable. I specifically like their
27 household products, such as shampoo.

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Harms Experienced Because of the Inaccessibility of Target.com

1
2 12. I prefer to shop online for items that one does not need to examine closely, such as toilet
3 paper, groceries, and shampoo. However, I also believe that though I am a blind person, I should
4 be able to browse products extensively online. I want the ability to look at the different varieties
5 of each product. When I go to the store now, I need to know exactly what I want because I am
6 taking the time of a customer service assistant. I want to be a free and independent person and
7 spend more time learning about products. If Target.com were easily accessible, I would
8 definitely use it in connection with my future visits to Target’s retail stores. By previewing
9 products on Target.com, I can also purchase items at physical Target stores more efficiently.

10 13. I would like to shop at Target.com because it would be nice not to have to physically
11 carry these products back home with me. I also want to make use of Target’s wedding registry
12 and weekly advertisements.

13 14. I attempted to use Target.com four to five times between 2003 and October 2006. On my
14 last visit, I spent between thirty to forty five minutes. I initially visited the site in order to find
15 about the weekly advertisements and sales.

16 15. Target.com contained links and images without labels as to what they were or what they
17 did. The site contained many images that were described by a number. This was problematic
18 because it was unclear where hyperlinks would lead.

19 16. Inexplicable code and garbled text prevented me from navigating the site. I only have so
20 much time to experiment with the site and to decipher what it is trying to present.

21 17. Target.com used unlabelled or incorrectly labeled forms requiring me to input
22 information. The word “edit” would often appear in place of the name of the form, and I would
23 not know what to enter in the field.

24 18. Use of Target’s web page made me feel frustrated.

25 19. Target.com does not treat me the same as it treats sighted individuals.

26 20. Lack of access to Target.com compromised my independence and forced me to rely on
27 others.

1 21. It is my hope is that Target will make and keep its website fully and easily accessible for
2 the blind so that I can shop the website just as sighted people do.

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

5 Executed this January day of 5, 2007, at Minneapolis, Minnesota.



8 CHARLOTTE CZARNECKI

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

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

27 Plaintiffs,

28 v.

TARGET CORPORATION,
Defendant.

Case No.: C 06-01802 MHP

CLASS ACTION

DECLARATION OF SHANNON DILLON
IN SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION

DISABILITY RIGHTS ADVOCATES
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1 I, Shannon Dillon, 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
5 Background

6 2. My name is Shannon Dillon. I am 33 years old, and I am totally blind due to
7 retinoblastoma.

8 3. I am an attorney with the California Department of Corrections and Rehabilitation.

9 4. My primary residence is in Albany, California.

10 5. I have been a member of the National Federation of the Blind since 1990.

11 Computer and Internet Use

12 6. I started using computers in 1988 when I was in high school. I am a proficient computer
13 user with extensive Internet experience. Previously, I taught Internet accessibility to other blind
14 individuals. I did this as an independent contractor and as an employee for several different bay
15 area companies and organizations, including the Society for the Blind in Sacramento.

16 7. I have accessed the Internet for at least ten years. Since Internet use is essential in law
17 school, I have used the Internet frequently since 1997, the year I started law school. I use the
18 Internet for legal research, job hunting, grocery shopping, and reading news, among other things.

19 8. I have used JAWS screen-reading software for at least ten years. Screen-reading software
20 makes me independent since it allows me to do my job, shop for groceries and Christmas gifts,
21 and even write birthday cards, among other essential tasks. Before I used screen-reading
22 software, I needed another person to read the computer screen for me as well as input
23 information on my behalf.

24 9. When graphics are labeled, I find navigating web pages to be possible and even efficient.
25 I can readily use the web pages of Macy's, Nordstrom, Gap, and Victoria's Secret. Compared to
26 other web pages, Target has been terrible to navigate.

Experience with Target Retail Stores

10. I like to shop at Target because I believe their products are affordable and of good quality. My friends and family like to shop at Target stores as well.

Harms Experienced Because of the Inaccessibility of Target.com

11. I find it inconvenient to travel to a physical Target store. I tend to buy a lot of products, and as a result, I must take a taxi or must have someone drive me to and from the store. It takes 25 minutes to commute back home, and taxi rides can be expensive. Moreover, taxi services often involve long waits and can be unreliable.

12. I find shopping online to be faster and more convenient than shopping in a physical store. Firstly, I do not have to worry about transportation to the store. I have limited time due to full time work and the commute to my job. Secondly, I sometimes feel as if customer service personnel perceive the time that they spend helping me as wasted. I do not enjoy feeling as if I am bothering them when I am trying to compare several different products. Finally, I find that the product descriptions can be better online. As a result, I can use Target.com in order to preview products that I can then ask for and purchase when I go to a physical Target store.

13. I have used Target.com at least three times. These visits occurred over the last several years; the last instance was in April 2006. Since then, I have actively avoided the web page because of its inaccessibility.

14. Despite my Internet proficiency, I found the site difficult to navigate because of inexplicable code and garbled text. The hyperlinks on the page were often random numbers or letters so that I was unable to determine where they led.

15. I had great difficulty using the forms and fields on Target.com. I needed to switch computer modes in order to determine what information went into which field. On other web pages, this task is done quite easily and readily.

16. During my first experience with the site, I exhausted four strategies of site navigation and was still unable to purchase products. For half an hour, I attempted to "check out" using all the

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1 Internet access strategies that I used to teach to students. I even called and asked other friends for
2 suggestions, but my attempts failed.

3 17. I was unable to use the "Continue to Checkout" button. I tried to click on this button in
4 four different ways with my JAWS cursor and my Braille display, but I was unable to click on
5 the button and purchase products. First, I tried to press Enter on this button. Second, I routed
6 JAWS to the check-out button in an attempt to double-click on it with my Braille display. Third,
7 I used the JAWS cursor and attempted to double-click with the slash on the number pad. Fourth,
8 I went to my home laptop computer and attempted to use the mouse button in conjunction with
9 the JAWS cursor. All my attempts and efforts failed.

10 18. When my friend used Target.com to set up her wedding registry, I avoided using the site
11 because I believed that I would be unable to purchase gifts through it.

12 19. In another instance, I was trying to buy a garbage bin with a lid to prevent my dog from
13 eating rubbish. Making this purchase at a store is problematic for me because, as a blind person, I
14 would have trouble carrying such a product home. However, I was prevented from this purchase
15 on Target.com since I could not click on the check-out button.

16 20. Target.com made me feel frustrated and disgusted. When I desire a specific product, I
17 find it very frustrating to find it and not be able to buy it.

18 21. Target.com did not treat me the same as a sighted individual. I feel that the web site did
19 not allow me to perform simple tasks that any sighted person can perform.

20 22. The lack of access on Target.com compromised my independence and forced me to rely
21 on others. I have to call someone else to check out, and I cannot get good descriptions of
22 products. More importantly, if I get another person to help me use Target.com, I must reveal
23 personal information, such as my address and credit card number, to them.

24 23. My hope is that Target will make and keep its website fully and easily accessible for the
25 blind so that I can shop the website just as sighted people do.

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

Executed this January day of ____, 2007, at Albany, California.

SHANNON DILLON

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Shannon Dillon 1/31/07