

EXHIBIT C

1 HAROLD J. McELHINNY (CA SBN 66781)
MATTHEW I. KREEGER (CA SBN 153793)
2 KRISTINA PASZEK (CA SBN 226351)
HMcElhinny@mof.com
3 MKreeger@mof.com
KPaszek@mof.com
4 MORRISON & FOERSTER LLP
425 Market Street
5 San Francisco, California 94105-2482
Telephone: (415) 268-7000
6 Facsimile: (415) 268-7522

7 Attorneys for Defendant
TARGET CORPORATION
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 NATIONAL FEDERATION OF THE BLIND,
the NATIONAL FEDERATION OF THE
14 BLIND OF CALIFORNIA, on behalf of their
members, and Bruce F. Sexton, on behalf of
15 himself and all others similarly situated,

16 Plaintiffs,

17 v.

18 TARGET CORPORATION,
19 Defendant.

Case No. C06-01802 MHP

**DECLARATION OF TRISH PERRY
IN SUPPORT OF TARGET
CORPORATION'S OPPOSITION
TO PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

Date: April 12, 2007
Time: 2:30 PM
Judge: The Honorable Marilyn Hall Patel

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DECLARATION OF TRISH PERRY

I, Trish Perry, have personal knowledge of the facts set forth below, and if called as a witness, I could and would testify under oath to the following:

1. I am a Senior Group Manager in Merchandising for Target Corporation. I have held this position for approximately two weeks. Before becoming Senior Group Manager in Merchandising, I served as Group Manager for Business Operations for Target.com.

2. As Senior Group Manager in Merchandising, I am responsible for representing Target Corporation in systems development.

3. Target could continue to operate its retail stores if Target.com ceased operating.

4. Of the items available for sale from Target's retail stores, the majority is not offered at Target.com. For example, Target.com does not sell the low-dollar staple items carried at Target's retail stores, such as detergents, mouthwash, anti-perspirant, toilet paper, or other items that do not fit the Target.com business strategy. Unlike Target retail stores, Target.com does not sell food items, with the limited exception of certain gourmet foods, candy, and gift baskets. In particular, Target.com does not sell Keebler Danish Wedding Cookies. The decision of what to sell at Target's retail stores is not made by Target.com.

5. Customers are able to purchase gifts at Target retail stores that are listed on Target's gift registries, provided that these items are sold in Target retail stores.

6. If asked, Target.com's 1-800 number representative would verbally describe the contents of a weekly advertisement that is available on Target.com, just as Target's retail store personnel would for a guest of Target's retail stores.

7. Target.com has an on-line pharmacy that guests can use to place prescription transfer or refill requests. Prescription transfer or refill requests may be made at pharmacies in Target retail stores or by telephone.

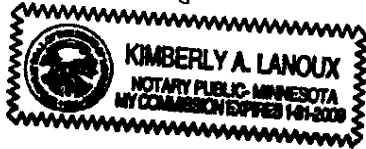
8. A partnership between Target.com and Yahoo! Photo allows guests of Target.com to upload digital photo files and pick up prints of these photos at Target retail stores. Digital photo printing is fully available at Target retail stores to those who bring in digital photo files on CD or other storage media.

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

3 Executed on March 8, 2007, at Minneapolis, Minnesota.

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6 _____
7 Trish Perry

8 Subscribed and sworn to before me
9 This 8th day of March, 2007
10 Kulevskanov
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