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 TARGET CORPORATION

8
 9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

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

DECLARATION OF TRISH PERRY

1
2 I, Trish Perry, have personal knowledge of the facts set forth below, and if called as a
3 witness, I could and would testify under oath to the following:

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

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

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

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

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

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

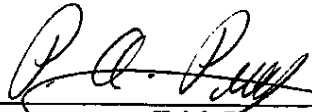
22 7. Target.com has an on-line pharmacy that guests can use to place prescription
23 transfer or refill requests. Prescription transfer or refill requests may be made at pharmacies in
24 Target retail stores or by telephone.

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

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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 on March 8, 2007, at Minneapolis, Minnesota.


Trish Perry

Subscribed and sworn to before me
This 8th day of March, 2007
Kimberly Lanoux

