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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 MATTHEW I.
 KREEGER IN SUPPORT OF
 TARGET CORPORATION'S
 OPPOSITION TO PLAINTIFFS'
 MOTION FOR CLASS
 CERTIFICATION**

Date: April 12, 2007
 Time: 2:30 PM
 Judge: Hon. Marilyn Hall Patel

1 I, Matthew I. Kreeger, declare:

2 1. I am a partner in the law firm of Morrison & Foerster LLP, counsel of record for
3 Defendant Target Corporation (“Target”) in the above-captioned case. I am admitted to practice
4 before the United States District Court for the Northern District of California. I have personal
5 knowledge of the facts set forth in this declaration.

6 2. Attached hereto as Exhibit A are true and correct copies of relevant excerpts from
7 the Deposition of Michelle Bruns taken in this matter on March 5, 2007.

8 3. Attached hereto as Exhibit B are true and correct copies of relevant excerpts from
9 the Deposition of Steven Jacobsen taken in this matter on May 31, 2006.

10 4. Attached hereto as Exhibit C are true and correct copies of relevant excerpts from
11 the Deposition of Christina Thomas taken in this matter on May 26, 2006.

12 5. Attached hereto as Exhibit D are true and correct copies of relevant excerpts from
13 the Deposition of Ken Volante taken in this matter on May 25, 2006.

14 6. Attached hereto as Exhibit E are true and correct copies of relevant excerpts from
15 the Deposition of Shannon Dillon taken in this matter on February 28, 2007.

16 7. Attached hereto as Exhibit F are true and correct copies of relevant excerpts from
17 the Deposition of Robert Ayala taken in this matter on May 31, 2006.

18 8. Attached hereto as Exhibit G is a true and correct copy of the Declaration of Trish
19 Perry in Support of Target Corporation’s Opposition to Motion for Preliminary Injunction filed in
20 this matter on June 13, 2006.

21 9. Attached hereto as Exhibit H is a true and correct copy of an email to James
22 Gashel from Chris Danielson dated December 2, 2006 (Bates numbered NFB 0007).

23 10. Attached hereto as Exhibit I is a true and correct copy of an email to Chairman
24 Mal and Dan Frye from Dan Frye dated April 29, 2006 (Bates numbered NFB 0006).

25 11. Attached hereto as Exhibit J is a true and correct copy of the Declaration of Dawn
26 Wilkinson in Support of Target Corporation’s Opposition to Motion for Preliminary Injunction
27 filed in this matter on June 13, 2006.

28

1 12. Attached hereto as Exhibit K is a true and correct copy of the Declaration of Dave
2 Wilkinson in Support of Target Corporation's Opposition to Motion for Preliminary Injunction
3 filed in this matter on June 13, 2006.

4 13. Attached hereto as Exhibit L is a true and correct copy of the Declaration of
5 Suzanne Tritten in Support of Target Corporation's Opposition to Motion for Preliminary
6 Injunction filed in this matter on June 13, 2006.

7 14. Attached hereto as Exhibit M is a true and correct copy of the Declaration of Chris
8 Polk in Support of Target Corporation's Opposition to Motion for Preliminary Injunction filed in
9 this matter on June 13, 2006.

10 15. Attached hereto as Exhibit N is a true and correct copy of an internet posting dated
11 April 13, 2006, which is Exhibit 2 from the Deposition of Marc Maurer taken in this matter on
12 March 1, 2007.

13 16. Attached hereto as Exhibit O is a true and correct copy of an internet posting dated
14 March 31, 2006, which is Exhibit 1 from the Deposition of Marc Maurer taken in this matter on
15 March 1, 2007.

16 17. Attached hereto as Exhibit P are true and correct copies of relevant excerpts and
17 exhibits from the Deposition of Marc Maurer taken in this matter on March 1, 2007.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed this 8th day of March, 2007, at San Francisco, California.

21
22 /s/ Matthew I. Kreeger
23 Matthew I. Kreeger
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