

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

Plaintiffs,

vs.

TARGET CORPORATION,

Defendant.

COPY

No. C06-01802 MHP

Deposition of
MICHELLE R. BRUNS
March 5, 2007

Reported by:

SHARON CABELLO, RPR, CSR

License No. 3080

SHARI MOSS & ASSOCIATES
Certified Shorthand Reporters
877 Cowan Road, Suite A
Burlingame, California 94101
Tel: (650) 692-8900

1 BE IT REMEMBERED THAT, pursuant to the laws
2 pertaining to the taking and use of depositions, and on
3 March 5, 2007, commencing at the hour of 1:29 p.m.
4 thereof, at the offices of Morrison & Foerster LLP, 400
5 Capital Mall, Sacramento, California, before me, SHARON
6 CABELLO, CSR No. 3080, a Certified Shorthand Reporter
7 in and for the State of California, personally
8 appeared:

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MICHELLE R. BRUNS

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12 being called as a witness by the Defendant, who, having
13 been by me first duly sworn, was thereupon examined and
14 interrogated as hereinafter set forth.

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Morrison & Foerster, LLP, represented by
Kristina Paszek, Attorney at Law, 425 Market Street,
San Francisco, California 94105-2482, appeared as
counsel on behalf of Defendant.

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Schneider & Wallace, represented by Rachel
Brill, Attorney at Law, 180 Montgomery Street, Suite
2000, San Francisco, CA 94104, appeared as counsel on
behalf of Plaintiffs.

1 ~~A. Well, just depending on what I needed at the~~
2 time, if it were furniture items, or lamps, or just
3 various household products.

4 Q. Okay. So you mentioned that you were on the
5 site two or three days ago to try to access the baby
6 registry; is that right?

7 A. For a baby shower, yeah.

8 Q. And whose baby shower was this?

9 A. A friend of mine.

10 Q. Okay. And what were you trying to -- strike
11 that.

12 Tell me about your experience accessing the --
13 trying to access the website two or three days ago for
14 your friend's baby shower.

15 A. I feel that it was a little complicated, more
16 than it needed to be, but it was manageable.

17 Q. Okay. Did you end up buying gift off of the
18 registry at that time?

19 A. Actually, at that time I did not because the
20 item that I was looking for was -- you couldn't do it
21 on the website, you had to go to the store to pick it
22 up.

23 Q. Did you try doing that?

24 A. I haven't yet, but I am going to.

25 Q. Okay. And how did you find out that it was

1 just available at the store?

2 A. It said available in store.

3 Q. Okay. Was that the first time that you tried
4 to access the baby registry?

5 A. No.

6 Q. How many times before did you try to access
7 the baby registry?

8 A. I would say over the last few years, probably
9 two or three times.

10 Q. Okay. And were you able to --

11 A. I'm sorry, it was not just the baby registry,
12 it was also the wedding registry. So just registry in
13 general would be more specific.

14 Q. Fair enough. Two or three times for the baby
15 or wedding registry?

16 A. Yeah.

17 Q. And did you buy gifts off of either of the
18 registries during those times?

19 A. In the past?

20 Q. Yeah.

21 A. I wasn't able to.

22 Q. Okay. Did you attempt to go to the store to
23 see if -- the Target retail store to see if you could
24 buy the gifts there instead?

25 A. At that time, yes.

1 Q. And were you able to?

2 A. Was I able to buy the gifts?

3 Q. Yes.

4 A. Uh-huh.

5 ~~Q. Okay. How did you become involved in this~~
6 lawsuit?

7 A. I was at a conference in early October of 2006
8 and --

9 Q. What -- sorry, go ahead.

10 A. -- and there were people there who were giving
11 information about the update of the case, and that's
12 when I became involved.

13 Q. And where was this conference?

14 A. It was in Los Angeles. I'm trying to remember
15 specifically, but I can't off the top of my head right
16 now.

17 Q. Who was giving the conference?

18 A. It was the National Federation of the Blind
19 State Conference.

20 Q. So the National Federation of the Blind of
21 California?

22 A. Uh-huh.

23 Q. So in what form were people at that conference
24 giving information about the case?

25 ~~A. Verbally.~~

~~1 Q. And then from there how did you become~~
2 involved?

3 A. I was speaking to one of the -- I believe he
~~4 is an attorney with DPA.~~

5 Q. Okay. About how often would you say you visit
6 Target's retail stores?

7 A. Probably weekly. Yeah, at least two or three
8 times a month.

9 Q. And so you do a lot of shopping at Target?

10 A. I do.

~~11 Q. Okay. I think that's all I have today.~~

~~12 A. Okay. Thank you.~~

13 (The deposition concluded at 1:40 p.m.)

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20 MICHELLE R. BRUNS

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REPORTER'S CERTIFICATE

I certify that the witness in the foregoing deposition was by me duly sworn to testify in the within-entitled cause; that said deposition was taken at the time and place therein named; that the testimony of said witness was reported by me, a duly Certified Shorthand Reporter of the State of California authorized to administer oaths and affirmations, and said testimony was thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said deposition.

IN WITNESS WHEREOF, I have hereunto set my hand this 5th day of March, 2007.



SHARON CABELLO
Certified Shorthand Reporter
State of California
Certificate No. 3080