

# **EXHIBIT E**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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,

COPY

Plaintiffs,

vs.

No. C 06-01802 MHP

TARGET CORPORATION,

Defendant.

Deposition of

SHANNON DILLON

February 28, 2007

Reported by:

KELLIE A. ZOLLARS, CSR, RPR, CRR  
License No. 5735

SHARI MOSS & ASSOCIATES  
Certified Shorthand Reporters  
877 Cowan Road, Suite A  
Burlingame, California 94010  
Tel: (650) 692-8900

1 BE IT REMEMBERED THAT, pursuant to the laws  
2 pertaining to the taking and use of depositions, and  
3 on February 28, 2007, commencing at the hour of  
4 1:40 p.m, thereof, at the law offices of Morrison &  
5 Foerster LLP, 425 Market Street, San Francisco,  
6 California, before me, KELLIE A. ZOLLARS, CSR  
7 No. 5735, a Certified Shorthand Reporter in and for  
8 the State of California, personally appeared

9

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**SHANNON DILLON**

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

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Morrison & Foerster LLP, represented by Matthew  
17 Kreeger, Attorney at Law, 425 Market Street,  
18 San Francisco, California 94105-2482, appeared as  
19 counsel on behalf of Defendant.

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Disability Rights Advocates, represented by Roger  
21 Heller, Attorney at Law, 2001 Center Street, Third  
22 Floor, Berkeley, California 94704-1204, appeared as  
23 counsel on behalf of Plaintiffs.

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25 //

1 ~~And I don't remember specifically, but~~  
2 it's -- there are other -- I know that was one  
3 definite problem.

4 Q. So there was a inconvenience in having to go  
5 back and forth between modes --

6 A. That's correct.

7 Q. -- to fill out a form?

8 A. That's correct. It takes a long time, and  
9 ~~it's not always completely accurate.~~

10 Q. Okay. When you had difficulty with the  
11 wedding registry, did you go to the Target store to  
12 purchase a gift for your friend?

13 A. No.

14 Q. Have you ever tried to purchase a gift for  
15 someone at the Target retail store based on what's on  
16 the wedding registry?

17 A. No.

18 ~~Q. Have you learned about any changes to~~  
19 Target's website since October of 2006?

20 MR. HELLER: Object to the form of the question.

21 THE WITNESS: Could you restate the question?

22 MR. KREEGER: Could you read it again, please.

23 (Record was read by the reporter.)

24 THE WITNESS: No, I don't believe so.

25 ~~BY MR. KREEGER:~~

1 STATE OF CALIFORNIA)

2 COUNTY OF SAN MATEO)

3 I hereby certify that the witness in the  
4 foregoing deposition, SHANNON DILLON, was by me duly  
5 sworn to testify to the truth, the whole truth, and  
6 nothing but the truth, in the within-entitled cause;  
7 that said deposition was taken at the time and place  
8 herein named; that the deposition is a true record of  
9 the witness's testimony as reported by me, a duly  
10 certified shorthand reporter and a disinterested  
11 person, and was thereafter transcribed into  
12 typewriting by computer.

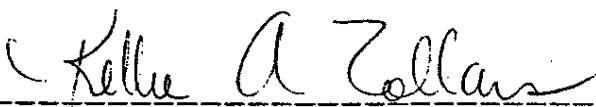
13 I further certify that I am not interested in  
14 the outcome of the said action, nor connected with,  
15 nor related to any of the parties in said action, nor  
16 to their respective counsel.

17 IN WITNESS WHEREOF, I have hereunto set my  
18 hand this 28th day of February, 2007.

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KELLIE A. ZOLLARS, CSR

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STATE OF CALIFORNIA

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