Daniel Carpenter-Gold, being duly sworn, deposes and says:

1. I am a Staff Attorney at TakeRoot Justice, with offices at 123 William St., New York, NY 10038.

2. I make the following statements based upon my personal knowledge.

3. I visited the corporate website of Respondent Target Corporation, www.target.com, on September 17, 2019. I made the following observations:

In addition to essentials in Health & Beauty and Grocery, including a pharmacy and larger selection of grab-and-go food options, TargetExpress also will include a variety of departments that are designed to inspire and encourage everyday discovery,”

(emphasis added).


For example, this store could include TargetExpress features such as grab and go food options, a full Beauty department and a Pharmacy,

(emphasis added).


Throughout 2017, Target is allocating millions of payroll hours for increased training and staffing at its stores across the country. This includes training for the 100,000 seasonal team members Target plans to hire this year, as well as enhanced training in key departments, such as Apparel, Beauty, Electronics and Food and Beverage,

(emphasis added).
d. The webpage “Go Behind the Scenes at the Opening of a New Target Store,” available at https://corporate.target.com/article/2018/08/philadelphia-opening and dated August 23, 2018, includes the following description of the opening of a “small-format” Target store:

Team members stock displays in each department, (emphasis added). It also includes the following quote from a Target employee:

[W]e have expanded Apparel and Home departments with Target’s new, exclusive brands front-and-center, lots of grab-and-go grocery options and other essentials, (emphasis added).


A series of quick shots reveal the store’s various departments. […] The camera pans a sign reading, “MAJOR IN BEAUTY,” next to images of bright green eyelash brushes, then pulls back along an aisle of cosmetic products. Karl stands in the beauty department.

KARL: We have a large selection of beauty at the store, and we also have a beauty concierge that'll help you with any of your questions or any of our products in the aisles.

Karl stands in the tech department, beside a lighted display of devices. A close-up reveals the devices.

KARL: If you're looking for a new phone or a new case, you should definitely check out our tech department. […] The camera follows Karl from behind as he walks along a main aisle. A quick series of shots reveal the store’s various departments.

   The camera quickly moves past aisles and the Men's Clothing department. The camera quickly moves past aisles towards the Toys department.  
   [
   . . .
   ]
   Kerome Coley stands in front of the Women's Clothing department and addresses someone off-camera.
   [
   . . .
   ]
   The camera pans down over the Beauty department of the store.


Sworn to before me this 19th day of September 2019

[Signature]

Notary Public

PAULA Z. SEGAL
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02SE6273635
Qualified in King County
Commission Expires December 17, 2020

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