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10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 CITY AND COUNTY OF SAN FRANCISCO

13 ELIEZER WILLIAMS, et al.,) Case No. 312 236
14)
15 Plaintiffs,) Hearing Date: August 25, 2003
16)
17 vs.) Time: 3:30 p.m.
18)
19 STATE OF CALIFORNIA, DELAINE) Department: 16
20 EASTIN, State Superintendent)
21 Of Public Instruction, STATE) Judge: Hon. Peter J. Busch
22 DEPARTMENT OF EDUCATION, STATE)
23 BOARD OF EDUCATION,)
24)
25 Defendants.)
26)
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28)
AND RELATED CROSS-ACTION.)
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I, Modrite Archibeque, declare as follows:

1. I am the Assistant Superintendent of Educational Services in the Mountain View-Whisman School District in Mountain View, California. I have held this position for over ten years.

2. I am familiar with the students, teachers, and facilities at Mariano Castro Elementary School, which is located in the Mountain View-Whisman School District, and I am familiar with the curriculum and the educational opportunities that are provided to Castro students. I have personal knowledge of the facts set forth in this declaration; and if called as a witness I would and could testify competently thereto.

3. I am familiar with the Mariano Castro's "II/USP Action Plan," which was completed during the 1999-2000 school year in connection with Castro's participation in the Immediate Intervention/Underperforming Schools Program. In fact, I personally had some involvement in the II/USP process at Castro school. I met with external evaluator, principal and staff when the school was preparing its action plan. Castro was first selected to be an II/USP school in the 1999-2000 school year.

4. I am aware that the plaintiffs in this case have cited page 8 of Castro's II/USP Action Plan, which they identified at DOE 72518, in a submission to this court. The statements on this page were not my statements or the statements of anyone at Castro school. Rather, they were the statements of

LA1:1015212.1

1 the external evaluator that worked with Castro as part of the
2 II/USP process.

3
4 5. Page DOE 72518 contains the external evaluator's
5 statement that "There were inadequate quantities of leveled
6 readers in at least one primary classroom, based on classroom
7 observations." This statement is misleading, in my opinion. The
8 leveled readers to which the statement refers are typically soft-
9 cover reading books at various reading "levels," in sets of about
10 six or so books. These leveled readers are not the primary,
11 state-adopted textbooks, but are supplemental materials that are
12 available to teachers and students. Castro currently has, and
13 had in 1999, adequate quantities of leveled readers for all
14 students to use. These readers are not stored in classrooms,
15 however. They are stored in a leveled book room from which
16 teachers can check them out, like they would check books out from
17 a library.

18
19 6. It is not necessary that every classroom have its
20 own set of leveled readers because the readers to which Page
21 DOE 72518 refers are not the primary, state-adopted textbooks.
22 Rather, it is a matter of teacher discretion whether to make use
23 of the leveled readers in the leveled book room. Therefore,
24 there might not be leveled readers in a classroom if a teacher
25 chose not to check readers out of the leveled book room.

26
27 7. Castro has enough leveled readers that any teacher
28 that does want to check them out can check them out. This is

1 true in large part because Castro has been focused for some time
2 on early literacy, and has therefore chosen to focus on making
3 leveled readers available and to invest in purchasing them.
4 Castro is constantly increasing the quantity of leveled books
5 that it has available for teachers and students to use. Castro
6 also received some funds from the II/USP program to provide early
7 literacy training to teachers.

8
9 8. Castro also has enough primary, state-adopted
10 textbooks for students to use in class and take home in each of
11 the four core subjects - Math, Language Arts, Science and Social
12 Science.

13
14 9. In my opinion, participating in the II/USP program
15 has been helpful to Castro school's overall student achievement.
16 The teacher training and enrichment that that has been available
17 to Castro staff through the II/USP program has also been quite
18 helpful. For example, all of the teachers in grades K-3 at the
19 school have gone through early literacy training. There is also
20 a literacy coach at the school that helps teachers to acquire
21 early literacy strategies and to use them in the classroom.
22 Classroom writing has also been strengthened since Castro has
23 been part of the II/USP program. Castro's receipt of a High
24 Priority Schools Grant last year has also helped the school to
25 improve the quality of education for Castro students.

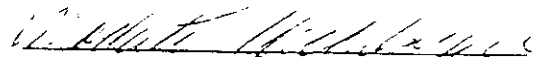
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27 10. The II/USP program has also helped the school and
28 the district focus on what needs to improve at Castro school to

1 improve student achievement. The district, in conjunction with
2 the school, brought in consultants to work with the school, paid
3 for out of II/USP funds. In addition, the district's Director of
4 Categorical Programs also allocated a lot of her time and
5 attention to Castro school during this time period. She observed
6 classes in session, worked with the principals and sat in on
7 focus groups to monitor how Castro was implementing the II/USP
8 grant.

9
10 11. Castro's Academic Performance Index ("API") score
11 improved from 472 in 2001 to 552 in 2002. I think that part of
12 this improvement is due to the increased focus that Castro has
13 gained by participating in the II/USP program.

14
15 I declare under penalty of perjury under the laws of the State of
16 California that the foregoing is true and correct.

17
18 Executed this 12th day of August 2003, at Mountain
19 View, California.

20
21 
22 Modrite Archibeque

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