

1 JOHN F. DAUM (SB #52313)  
2 FRAMROZE M. VIRJEE (SB #12C401)  
3 DAVID L. HERRON (SB #158881)  
4 O'MELVENY & MYERS LLP  
5 Embarcadero Center West  
6 275 Battery Street  
7 San Francisco, California 94111-3305  
8 Telephone: 415.984.8700

9 Attorneys for Defendant State of California

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
CITY AND COUNTY OF SAN FRANCISCO

11 ELIEZER WILLIAMS, et al., ) Case No. 312 236  
12 )  
13 Plaintiffs, ) Hearing Date: August 25, 2003  
14 vs. ) Time: 3:30 p.m.  
15 )  
16 STATE OF CALIFORNIA, DELAINE ) Department: 16  
17 EASTIN, State Superintendent )  
18 Of Public Instruction, STATE ) Judge: Hon. Peter J. Busch  
19 DEPARTMENT OF EDUCATION, STATE )  
20 BOARD OF EDUCATION, )  
21 Defendants. )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )  
AND RELATED CROSS-ACTION.

23  
24  
25  
26  
27  
28  
DECLARATION OF ROBERT HUDSON IN SUPPORT OF DEFENDANT STATE OF  
CALIFORNIA'S OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY  
ADJUDICATION

LA2:682607.1

1 I, Robert Hudson, declare as follows:  
2

3 1. I am the superintendent of Laton Unified School  
4 District in Laton, California. I have been the superintendent  
5 since last August. I also teach Introduction to Teaching and  
6 Diversity courses at Chatman University. Prior to becoming  
7 superintendent of Laton Unified, I was superintendent of  
8 Allensworth School District for approximately 3 and half years,  
9 principal of Kings River Hardwick School for about a year and a  
10 half, and resource teacher for the Tulare County Office of  
11 Education for approximately five years. I worked for the  
12 Corcoran School district for approximately five years as a vice  
13 principal and teacher. I have extensive knowledge of the  
14 students, teachers, and facilities at Laton Unified, and am  
15 familiar with the curriculum and the educational opportunities  
16 that are provided to Laton Unified students. I have personal  
17 knowledge of the facts set forth in this declaration; and if  
18 called as a witness I would and could testify competently  
19 thereto.

20  
21 2. I am familiar with Laton High School's "Initial  
22 Report of Findings" (II/USP action plan) dated April 2000.  
23 Although I was not yet working in the district, I understand that  
24 Laton High was first selected to be an II/USP school in the 1999-  
25 2000 school year and that at the time, among other issues, there  
26 was an insufficient number of textbooks for English classes. It  
27 is my belief that many of the problems identified in Laton High's  
28 II/USP action plan were due to the lack of effective district

LA2:692607.1

1 leadership that existed at the time. In the past couple years,  
2 however, leadership both at the district and school level has  
3 changed significantly. The district, along with Laton High's  
4 administration, are dedicated to improving the education of our  
5 students and raising student achievement. In fact, since I  
6 arrived last year, the district has worked diligently and has  
7 devoted substantial local and state funds to revamping Laton High  
8 and increasing the quality of education.

9  
10 3. Although Laton High is now making progress, it had  
11 failed to make academic growth during the first two years that  
12 the II/USP program was implemented. Last year, therefore, the  
13 district was mandated by law to enter into a contract with the  
14 State School Assessment Intervention Team ("SAIT"). SAIT  
15 conducted a thorough review of Laton High and provided the  
16 district with various items that the district was required to  
17 resolve. Among other items, SAIT required that the district  
18 update Laton High's curriculum, implement a core-based math  
19 program, strengthen Laton High's pedagogy, provide standards-  
20 based professional development and modernize the high school's  
21 facilities. Laton High and the district have made great strides  
22 in complying with all of SAIT's requirements.

23  
24 4. In the last year, we adopted and implemented a new  
25 and more challenging curriculum for Laton High that is aligned to  
26 the state content-standards and generally seeks to infuse those  
27 standards into all aspects of learning. Additionally, we are  
28 providing our teachers with intense professional development that

LA2:682607.1

1 focuses on math and reading instruction and trains them on ways  
2 to effectively deliver the curriculum. Indeed, we have retained  
3 WestEd, S-4, and GRA among other reputable organizations, to  
4 provide Laton High teachers with professional development in the  
5 content-standards and in English language development.  
6

7  
8 5. Laton High is also in the process of updating its  
9 instructional materials. This year we invested approximately  
10 \$4,500 in new English books that are aligned to the State's  
11 content-standards. It is my understanding that there are  
12 sufficient English books for all students to use in class and to  
13 take home for purposes of homework. Moreover, Laton High is also  
14 in the process of updating its Language Arts materials and is  
15 purchasing new math materials that incorporate a rigorous and  
16 standards-based curriculum. We anticipate that these materials  
17 will be available for the upcoming school year.

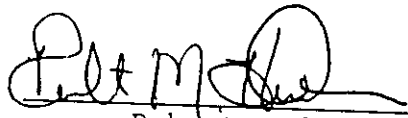
18  
19 6. Laton High's facilities have also undergone  
20 substantial improvements. This past year, the district purchased  
21 a new roof that cost \$850,000, built a new fence that surrounds  
22 the campus, and installed air conditioning throughout the school.  
23 Next year, we plan to completely modernize the gym and add a new  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

cooling system and entirely refurnish classrooms - from re-wiring to adding new ceilings.

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

Executed this 27<sup>th</sup> day of July 2003, at Laton, California.

  
Robert Hudson