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San Francisco
JUL 19 2004

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ELIEZER WILLIAMS, etc., *et al.*

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 COUNTY OF SAN FRANCISCO

19 UNLIMITED JURISDICTION

20 ELIEZER WILLIAMS, a minor, by SWEETIE
WILLIAMS, his guardian ad litem, *et al.*, each
21 individually and on behalf of all others similarly
situated,

No. 312236

DECLARATION OF ISAAC MEDINA

22 Plaintiffs,

23 v.

24 STATE OF CALIFORNIA, DELAINE EASTIN,
State Superintendent of Public Instruction,
25 STATE DEPARTMENT OF EDUCATION,
STATE BOARD OF EDUCATION,

Hearing: October 1, 2003
Time: 3:30 p.m.
Department: 20, Hall of Justice
Judge: Hon. Peter J. Busch
Date Action Filed: May 17, 2000
Trial Date: August 30, 2004

26 Defendants.

1 **Declaration of Isaac Medina**

2 I, Isaac Medina, hereby declare:

3 1. I make this declaration based on my own personal knowledge and if called to
4 testify I could and would do so competently as follows:

5 2. I am a student at Roosevelt High School in Los Angeles, where I am a sophomore.
6 I have gone to Roosevelt since the beginning of 9th grade. I am in track "B."

7 3. In my Biology class, the classroom is so overcrowded. I think there are almost 40
8 students in the class. Most of the time, at least 5 students have to stand during the class because
9 there are not enough chairs or stools for everyone. The teacher has a system where students
10 rotate so that everyone at some point has to stand during the class. I have noticed that some days
11 there are more chairs than others. I think it's because other classrooms are also overcrowded, so
12 teachers send students to get chairs from the other classrooms, so no matter what, there are
13 students standing in some classes.

14 4. In my History class, we started the year with only 25 students. Then a few months
15 later, I think they let go of some teachers, because all of a sudden my History class had 40
16 students in it. The classroom is very overcrowded now, and the fact the class is bigger has really
17 affected my grades. The first two quarters, I got A's in my History class. Now, I am barely
18 passing my History class. I think this is because before, when the class was smaller, I had more
19 help from my teacher. Our teacher would often tell us we were moving forward at the right pace
20 with all of the material we had to learn. Now, with the classroom as overcrowded as it is, and
21 with some of us having to share really small desks with each other, it's very hard for anyone to
22 learn. I don't understand how they expect us to learn when we don't even have enough room to
23 write things down or to even put our books on the table. Sometimes we have to share some of
24 the material we get in class, like handouts, and it takes long because not everyone can read at the
25 same rate. Our History teacher tells us we are behind, and he seems very stressed out because we
26 are not catching up.

27 ///

28 ///

1 5. In my homeroom class, we have to go to a bungalow out in the corner of the
2 campus. The bungalow is very small and the class is overcrowded. I think there are like 35
3 students in that small room. There is no air conditioning inside the bungalow, and often times
4 our teacher moves the class outside because its so overcrowded and because it gets too hot in the
5 bungalow. Also, my homeroom class has had to move five times in the last year. Our teacher
6 told us we had to move because Track A or Track C classes were coming back and needed to use
7 the classroom. We spent one semester in a classroom inside the “B” building, then the next
8 semester our class moved to the “R” building, then during that semester we had to move again to
9 the “L” building. I even have friends who have their homeroom class inside the school
10 gymnasium because there is no classroom available for them to use. I think that’s pretty sad, to
11 have homeroom in a gymnasium. I know I would be pissed off if that was me.

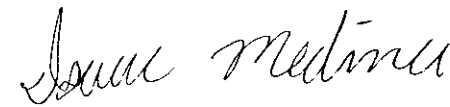
12 6. Some of bathrooms at Roosevelt are very bad. If you ask anyone what the worst
13 thing about Roosevelt is, they’ll probably tell you the bathrooms. I think the dirtiest bathrooms
14 at Roosevelt are the ones in the “S”, “T”, and “A” buildings. The toilets usually don’t flush, and
15 the bathroom floors and sinks are always too dirty to use. Sometimes you see paper all over the
16 bathroom floors and bathroom walls. Also, many times there are no paper towels, so I have to
17 wipe my hands on my shirt or pants. Some bathroom sinks don’t even work at all, so I can’t even
18 wash my hands, which is pretty dirty and it’s something I’m not happy about. The toilets are the
19 worst part about the bathrooms. It is really hard for me to go “number two” because the
20 bathrooms are so bad. Some of the stalls do not have doors, so almost no one uses the toilets
21 because anyone who walks into the bathroom will see you sitting there. There is sometimes no
22 toilet paper available, and the toilet seats are in bad condition and some toilets are missing toilet
23 seats. I have seen urine and human waste all over the toilets. Sometimes the same dirty toilet I
24 see in the morning is still in the same condition when I walk into the bathroom at the end of the
25 day. I don’t get it. How do they expect us to use the bathrooms when they look like that?
26 Sometimes, I have to go home to use the toilet because there are no clean toilets to use at school.
27 Actually, I know a lot of people who have left school to go home and use the bathroom. Some
28 people wait until the end of the day to go home and use the bathroom. How do they do that?

1 7. The classrooms and halls at Roosevelt have a lot of cockroaches, ants, and even
2 rats. A few months ago, in my History class, there was a big rat that some of us actually saw
3 walking on floor during class. Our teacher put a bunch of rat traps in the classroom. I don't
4 know if they caught the rat or not. Some of the rat traps are still in the classroom floor. Having
5 rats and cockroaches is not cool at all. I mean, I don't even have that many cockroaches or even
6 any rats at my own house, and then I have to see those things at school. I know it bothers me and
7 a lot of other students too.

8 8. There is a big problem with leaky ceilings in some of my classrooms. In my
9 History and my English class, it looks like the ceiling is ready to fall off. When it rains you can
10 see the ceiling turn yellow from the water leaks. Some of the white ceiling panel things have
11 started to rip and sometimes you can see holes in the ceiling from the rips and you can also see
12 pieces of the ceiling on the floor when I come to class. When the ceiling leaks in my History and
13 English classes, the teachers put trashcans under the leaks to keep the floors dry. The noise from
14 the leaks bothers me a lot.

15 9. In my History class, we do not have enough textbooks for everyone. I do not have
16 my own history book. Our teacher makes photocopies of the history book chapters and that is
17 what we use in class and for our homework. We've used these worksheets for the whole year. In
18 my English class, the textbooks are in very bad shape. Some books have pages missing, and
19 some books have so much writing on them that it's very hard to read. The English books look
20 old. In my Math class, the textbooks are also in very bad shape. Like my English book, some of
21 the math books have pages missing and some have so much writing you can't read certain pages.
22 The math books also look pretty old to me.

23 I declare under penalty of perjury of the laws of the State of California and the United
24 States that the foregoing is true and correct. Executed this 30th day of June, 2003 in Los Angeles,
25 California.



Isaac Medina