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San Francisco Superior Court
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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,

22 Plaintiffs,

23 v.

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

26 Defendants.

No. 312236

27 **DECLARATION OF KIM-SHREE MAUFAS**

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

1 I, KIM-SHREE MAUFAS, hereby declare:

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

4 2. My daughter Francesca Maufas was a student at Thurgood Marshall Academic High
5 School from June 2001 until February 2003. I was the Parent Liaison at Thurgood Marshall from
6 January 2002 until June 30, 2002. I was the President of the Thurgood Marshall Parent-Teacher-
7 Student Association (“PTSA”) from July 1, 2002 until June 30, 2003. I was the Girls’ Track and
8 Field coach at Thurgood Marshall from January 2002 until December 2002. I have spent a lot of
9 time at Thurgood Marshall during the past few years. When I was the Parent Liaison I worked at
10 the school about forty hours a week. When I was the President of the PTSA I visited the school
11 on average three times a week.

12 3. My daughter Francesca had no permanent teacher in her Spanish class for at least the
13 first five weeks of the 2002-2003 school year. As a result, she wasn’t learning anything in that
14 class. My daughter still could not say “hello” in Spanish by October, 2002, even though she had
15 been in Spanish class for five weeks. She was bringing home practically no homework. By
16 October 10, 2002, my daughter had already had five different teachers in her class, some of whom
17 could not even speak Spanish. One of the previous teachers had walked out of the class in the
18 middle of the day and did not return. Another teacher didn’t speak any Spanish and just handed
19 out worksheets for the students to do on their own.

20 4. Students regularly do not have enough books to use for their classes. I often saw
21 students going to the office or teacher’s lounge to make copies and when I inquired what they
22 were doing I found out they were making copies of learning materials because their classes didn’t
23 have enough books. To make up for the lack of books teachers would bring in their own materials
24 to copy or would make copies of the few books they did have. For example, in my daughter’s
25 Spanish class the students did not have a book to bring home so the teachers used a lot of
26 worksheets instead.

27 5. Thurgood Marshall is way too crowded. The school was built to be a middle school
28 but now it holds high school students, who are much bigger. When I was being trained as a Parent
sf-1528557

1 Liaison they told me that Thurgood Marshall is only supposed to have 800-900 students but there
2 are actually over 1100 students there. About 200-300 larger bodies are crowded into the school
3 than are supposed to be there. Teachers and administrators are always talking about what a
4 problem this is. You can see how crowded it is when you are in the hallways. When I walk in the
5 hallways during passing periods it is a zoo. Kids have to push through the crowds to get to their
6 lockers and their next classes on time. On my visits to the school I have noticed that the cafeteria
7 is also extremely crowded. The line for children to get food extends outside of the cafeteria and
8 down the hall. Many children were not able to get their lunch by the time the bell rang for lunch
9 to end.

10 6. The bathrooms at Thurgood Marshall are filthy. In general when I visited Thurgood
11 Marshall I always knew to go to the bathroom before I got there because the bathrooms were so
12 disgusting. But one day when visiting I needed to use the restroom so I went in to use a girls'
13 bathroom. Two of the doors were broken off so there were only two stalls available. The
14 handicapped bathroom was clogged. The one working toilet was covered in toilet paper with trash
15 all over the floor. It was disgusting.

16 7. The locker rooms at Thurgood Marshall are really nasty. I have been into the boys'
17 locker room three times but refuse to ever set foot in the girls' locker room because they were
18 rumored to be even worse than the boys. The lockers look they're in a sunken ship—they are
19 completely rusted out and covered in gunk. Other parents have told me that when visiting teams
20 from other schools come to Thurgood Marshall they complain about having to use the locker
21 rooms because they are so nasty.

22 8. The school is falling apart in other ways too. Tiles are missing all over the school—
23 off of the ceilings and off of the walls. There are broken windows all around the school that are
24 taped up and not repaired quickly. One very large window at the back of the school has been
25 broken for months and remains taped over.

26 9. Thurgood Marshall has a real problem with rodents. I used to run the PTSA meetings
27 in the staff lounge and particularly at night lots of mice would come out and run around. I saw
28 mice over ten times last school year. I used to try to coax the parents into sitting at the table

1 instead of the couches because the mice really liked the couches. When I worked in there alone at
2 night I would put my feet up on a chair so the mice wouldn't run over them.

3 10. When the students walk into the school they feel helpless. I think the terrible shape
4 the school is in really affects the students. The atmosphere at the school makes the kids feel like
5 they can't compete with students in other schools and they can go on to college and succeed.

6 I declare under penalty of perjury under the laws of the United States and the State of
7 California that the foregoing is true and correct. Executed this 2nd day of July, 2003, in San
8 Francisco, California.

9 Dated: July 2, 2003

10
11 By: 
12 Kim-Shree Maufas

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