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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.)
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28)
AND RELATED CROSS-ACTION.)
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DECLARATION OF GRANT BENNETT IN SUPPORT OF DEFENDANT STATE OF CALIFORNIA'S OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY ADJUDICATION

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DECLARATION OF GRANT BENNETT

I, Grant Bennett, say:

1. I am the principal of Perris High School in Perris Union High School District in Riverside, California. I have been the principal since spring of 2000. Prior to 2000, I was assistant principal at Perris High School for a year and a half. I have extensive knowledge of the students, teachers, and facilities at Perris High, and am familiar with the curriculum and the educational opportunities that are provided to Perris High School 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.

2. I am familiar with Perris High School's involvement in the Immediate Intervention of Underperforming Schools Program ("II/USP"). Perris High School was first selected to be an II/USP school in the 1999-2000 school year. Since that time, Perris High School has made significant strides in student achievement. Indeed, Perris High School almost tripled its API growth target this past year and made significant increases in its California English Language Development Test ("CELDT") scores, which tests English proficiency levels. Furthermore, this past February, the State Board notified Perris High that it met its Adequate Yearly Progress ("AYP") and is no longer underperforming.

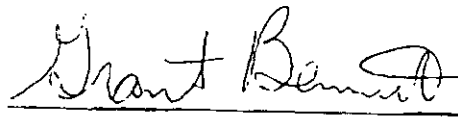
1 3. In 1999, as assistant principal, I was heavily
2 involved in Perris High School's participation in II/USP. In
3 particular, I worked closely with the external evaluator who was
4 hired to help assess student needs and develop an action plan to
5 meet those needs. I also participated in Perris High School's
6 November 4, 1999 public meeting, which was conducted by the
7 external evaluator in an effort to gather information from
8 parents, staff and students regarding Perris High School's
9 strengths and weaknesses. Feedback from this meeting was later
10 used in developing Perris High School's action plan.
11

12 4. One item, among others, that was raised at this
13 November 4, 1999 meeting was the concern that students at Perris
14 High School did not have proper instructional materials that were
15 aligned to the State's content standards. Although Perris High
16 School had sufficient math textbooks for students to use in class
17 and to take home, Perris had not yet purchased math textbooks to
18 comply with the State's latest adoption cycle. Accordingly, it
19 was generally recommended that instructional materials be updated
20 to comply with the State's recent adoptions. This
21 recommendation, among other items, was eventually included in
22 Perris High School's II/USP action plan. Furthermore, in the
23 beginning of the 2001-2002 school year, Perris High School
24 purchased and implemented the newly adopted math and social
25 studies instructional materials. This summer (2003), we just
26 purchased the new English language arts materials, which the
27 State just recently adopted.
28

1 5. I am generally familiar with the Williams lawsuit
2 and am aware that plaintiffs cite Perris High School's Public
3 Meeting minutes in their motion for summary adjudication to
4 suggest that Perris High does not have sufficient and appropriate
5 textbooks. This is not the case. As discussed above, I was at
6 the November 4, 1999 meeting to which plaintiffs cite. The
7 general concern regarding textbooks at that meeting, to best of
8 my recollection, was that the district had not yet updated its
9 math materials to reflect the State's recent adoption. Not only
10 has this issue been resolved, all instructional materials used in
11 core classes at Perris High School are aligned with the State's
12 standards and comply with the State's most recent adoptions. In
13 addition, each student at Perris High School has a textbook to
14 use in class and to take home for purposes of homework in all
15 core classes.

16
17 I declare under penalty of perjury that the foregoing
18 is true and correct.

19
20 Executed this 21 day of July, 2003 at Perris,
21 California.

22 
23

24 Grant Bennett
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