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DECLARATION OF LAWRENCE POON

I, LAWRENCE POON, hereby declare:

1. I am one of the plaintiffs in this action. I make this declaration based on my own personal knowledge and, if called to testify as a witness, I could and would do so competently as follows:

2. I am a student at Balboa High School in San Francisco, where I will be a senior in the fall.

3. I have had no books to take home for homework in any class during my three years at Balboa High. We mainly take home copied papers or exercises we get from the chalkboard. For some classes like Spanish or math, though, you really need a book of your own to take home. If you don't understand something, you can check in the book for guidance, if you have a book. I don't have anyone at home who can help me with Spanish, and I don't know anyone I can call who speaks Spanish, so I need the book to check for vocabulary when I'm doing homework.

4. We didn't even have enough books for everyone to use in class without sharing when I took Spanish 1 and Spanish 2. Most of the time everything we did was on the board or on paper because we had too few books.

5. For a full semester last year, I had no permanent Spanish teacher. We had a continuous string of substitutes each and every day instead of having one single teacher for the semester. Three days is about the longest any substitute stayed all semester. None of the substitutes actually knew any Spanish at all. I didn't learn anything about Spanish that semester. Often, we just watched movies, that were not in Spanish and that didn't have anything to do with Spanish class, for the two hours of class. At the end of the semester, we got a packet to review for a week and then we took a test. None of us understood the test because we hadn't had a teacher all semester.

6. I also had continuous substitutes instead of a permanent teacher in two English classes during my sophomore year. The substitutes just gave us work that the original teacher had prepared for us, but they didn't teach us what we needed to know to do the work. I didn't learn what I was supposed to learn in English class that year.

7. Balboa loses a lot of teachers each year because the pay is so low and because of the

1 environment at the school. Losing so many teachers is a really hard thing to deal with because some
2 really great teachers have left, and when they left a part of our education has gone as well. It makes
3 a big difference when good teachers leave. For example, I know a lot of students took Japanese but
4 then couldn't keep taking it because the teacher left. So then those students had to learn a whole
5 different new language in order to graduate, and they lost credit for that year of Japanese.

6 8. Even if I had teachers and books for all my classes, I'm still missing out on my
7 college requirements because I can't take the classes I need at school. Our school changed its
8 scheduling between this last year and the year before. We used to be able to take eight classes in a
9 year, but now we can only take six classes because the school changed our schedule around. Under
10 our old schedule, one semester of a foreign language counted as a whole year because of the eight
11 course schedule, where we took more hours of a subject during the day. So last year I could take
12 Spanish 1 and Spanish 2 in one semester, but now I will have to take a full year to complete the same
13 amount of work. Now it's going to be hard for me to take all the classes I need to graduate and to
14 get into college. I'm going to have to take physics at City College next year. I could take it at
15 Balboa, but it would take up too many periods and my priorities at Balboa have to be graduation
16 requirements, not college entrance requirements. I'm afraid I won't get into Berkeley, which is the
17 college I want to go to, because I won't have taken all the classes I need, so that's why I'm taking
18 physics at night in addition to going to regular high school classes. I also know it's going to be hard
19 for some other kids just to graduate on time.

20 9. Our school doesn't offer many nonacademic electives for us to take, like acting class
21 or woodshop. We don't get the money the school needs for these things, so the school can't offer
22 them. I'm taking art now at summer school, and I have to buy the supplies. Everyone in the class
23 has to pay a \$5 fee for class materials to be able to take the class. We just don't get a lot of
24 opportunities at Balboa—nothing that really gears us toward college. It's sad.

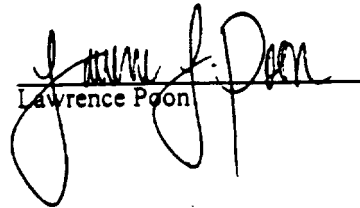
25 10. I know our teachers spend a lot of money on us. The teachers have to pay for supplies
26 like calculators, rulers, and pencils.

27 11. The bathrooms at Balboa are really nasty. We never have toilet paper or soap or any
28 supplies—we just have water and that's it in the bathrooms. All the walls are written up with graffiti.

1 The floors are always dirty and wet. The bathrooms just aren't sanitary. Also, only two of the three
2 bathrooms are open during the day.

3 12. About 60 percent of the classrooms have something wrong with the heater
4 Sometimes the heater in a classroom is broken, so it's on all the time and the class is too hot. But
5 in other classes there is no heat at all because the heat is broken. I wore coats in my third floor
6 classes, where the school is the coldest.

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8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed on July 31, 2000 at San Francisco, California.

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12 Lawrence Poon
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