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I. Hanover Mares, declare and state:

- I am a plaintiff in this action. I make this Declaration based upon personal knowledge and, if called upon to do so, I could and would competently testify to the matters set forth herein.
 - 2. I attend Berendo Middle School in Los Angeles, California.
- 3. The purpose of this declaration is to describe some of the unacceptable conditions at my school. These conditions include: not having textbooks to take home, terrible smelling buildings, bathrooms which are always dirty and wet, having a string of substitute teachers in my classroom throughout the school year, and not having a library.
- I have six classes in which we use textbooks, but I only have two textbooks which 4. I am allowed to take home. I have a history book and a math book which I am allowed to take home and study. I do not have an English book or a science book to take home. This makes it hard for me to study those subjects and progress in my education.
- I am a hall worker at school and almost every day I am required to make a delivery 5. to Gail Hall which is a building that smells awful. It smells worse than the bathroom. There are various classrooms and a computer room in this building. I just go into Gail Hall to pick up kids who are called out of class; thankfully I do not have any of my classes there. I don't know how anyone can stand to sit in those classrooms and actually concentrate because the smell is so overwhelming and foul.
- Other conditions at Berendo are also appalling. The bathrooms at that school are filthy. There is paper all over the floor and it looks like they are rarely cleaned. The toilets are constantly overflowing and there is water all over the floor. It is slippery and very dangerous. The stench is terrible. I never use the school bathrooms.
- Another major problem which I have experienced at Berendo is that one of my 8. teachers has been out almost all year on maternity leave and we have had a lot of substitutes. These substitutes do not seem to know anything about history. We have seen lots of movies with the substitutes, including Stuart Little, a Goofy movie, the Sixth Sense, Tarzan and Nightmare on

DECLARATION OF HANOVER MARES

Elm Street. I think that we have seen at least ten movies this year. The other problem with the substitutes is that we had one who was constantly using bad words, like "shit", when he would refer to our homework. A teacher should not be using bad words in class.

- 9. There is one other problem at Berendo. There are a lot of gangs at my school and it is really scary. They burn the trashcans at school and there is a lot of theft, too. I don't even use my locker because I am afraid that it will get broken into and someone will steal my things. This happens all the time to people who do use their lockers. Because I am an office assistant. I am allowed to leave my things in the office, but other students are not so lucky. It is really hard for many of them to have to carry around all of their belongings because they are afraid that they will be stolen if they are left in their lockers. This problem creates a sense of insecurity and fear in the school. This is very distracting and makes it difficult for me to concentrate on my studies.
- 10. At Berendo, the library is being renovated. It has been closed down for a couple of months now and none of the students can go in to study or check out books there. It makes it hard if we have to do a big project, because we do not have access to the school library or books that we need in order to complete our work.
- As I have explained, the overall conditions at Berendo Middle School are poor. It upsets me that I do not have enough textbooks for all of my classes and that I don't even have access to a clean restroom when I am at school. I believe that I deserve the same quality education as other students in other public schools are receiving, yet this is not happening at Berendo.

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

Executed this 5 day of ______, 2000 in Los Angeles, California.

Hanover Mares

DECLARATION OF HANOVER MARES

I, Christina L. Checel am an associate with Morrison & Foerster LLP. I read, write and speak Spanish fluently. In May, 2000, I orally translated the declaration of Hanover Mares from English into Spanish to Hanover Mares, and the written English version of his declaration is an accurate reflection of the oral Spanish translation I did.

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

Executed this 24 day of August, 2001, in Los Angeles, California.

Christina L. Checel