

1 Declaration of Alexander Nobori

2 I, Alexander Nobori, hereby declare:

3 1. I am a plaintiff in the above-captioned action and if
4 called to testify could and would do so competently as follows:

5 2. I am thirteen years old and an eighth-grader at
6 Brightwood School in Alhambra. I have attended Brightwood since
7 kindergarten.

8 3. My school is old and falling apart, and repairs are done
9 slowly if at all. For example, the steps up to the main office
10 were beat up and cracking all over the place for years. Every time
11 I went in there, I would have to walk very carefully and would be
12 afraid that the steps might give way underneath me at any time.
13 Luckily, they finally fixed them last year.

14 4. Some of the problems with the conditions at Brightwood,
15 make it dangerous to go to school there. Last month, I was sitting
16 up in the school's play area and saw another kid sitting on the
17 swing. While he was on it, one of the chains holding the swing up
18 broke, and the kid fell to the ground. A nurse had to come up and
19 wheel him away in a wheelchair. The swing is still broken. They
20 have just tied it up so no one can use it.

21 5. Last year I hurt myself and had to miss some school
22 because the steps from the main campus to the bungalows on the play
23 area are not lit. I was acting as a runner for the school's winter
24 play. The students were supposed to wait in their classrooms until
25 I came and told them that it was time for them to go on. I ran up
26 the stairs to the bungalows on the upper playground to tell the 7th
27 graders that it was their turn to go on. When I headed back down
28

1 the stairs, I tripped and fell down 5 to 6 steps. I hurt my
2 tailbone pretty badly, was on crutches and had to miss some days of
3 school. The stairs are dangerous at night because there are no
4 lights. I think if there were lights on the stairs, I would not
5 have fallen and hurt myself.

6 6. My eighth grade classroom is in the main building rather
7 than in a bungalow. We do not have air conditioning in my
8 classroom. When it is hot outside, my classroom becomes very hot.
9 In fact, it is hotter in the classroom than it is outside. I feels
10 to me as if the classroom temperature gets into the 90's.

11 7. When the temperature gets that high, it is very hard to
12 concentrate. Everyone in the rooms sweat a lot, and you can see
13 people who can barely stay awake or who are actually sleeping. The
14 fan we have in the class does not provide much relief. It just
15 moves the hot air around. Also, we sometimes cannot even have the
16 fan on. If the teacher shows a video, we turn the lights off,
17 which cuts the electricity to the fan.

18 8. When it is hot, I also get thirsty all the time. The
19 water fountain outside our class is broken, so we have to bring
20 water bottles to class to try to stay hydrated. If you forget your
21 bottle, you become really thirsty, making even harder to do any
22 work.

23 9. The bathrooms at Brightwood are disgusting. The lighting
24 is bad and they are dark, dirty, and smell awful. In past years,
25 there often were no paper towels. There was never any soap or hot
26 water so I could not wash my hands properly. Also, the toilets
27 overflowed a lot, so there would be dirty water on the floor of the
28 bathrooms or the floors would be gross and sticky. It does not

1 seem that the bathrooms get cleaned much.

2 10. There are not many bathrooms at the school either. I
3 think there are three bathrooms for boys that each have two stalls
4 and 3 or 4 urinals.

5 11. The bathrooms are so gross, I rarely use them. In fact,
6 I have not used a stall even once this year. I have just learned
7 to hold it until I get home.

8 12. I have been at Brightwood since I was in kindergarten, so
9 it is hard for me to compare Brightwood to any other school. But
10 I do know that our classrooms should not be so hot that the
11 students can barely stay awake and that our bathrooms should be
12 clean and usable, not smelly and disgusting. I think it is unfair
13 for us to have to try to learn in conditions like these.

14 13. Next year I will be attending Mark Keppel H.S. I have
15 already been to Keppel because I take an advanced math class there.
16 The conditions at Keppel are pretty bad also. I know that there is
17 only one bathroom in the whole main school building, and there are
18 no doors on the stalls. I think students deserve basic privacy
19 when they use the bathrooms, and it is disappointing to me that
20 poor conditions exist at Keppel.

21 I swear under penalty of perjury of the laws of the State of
22 California and the United States that the foregoing is true and
23 correct. Executed by me this 21 day of May, 2000 in Montebello,
24 California.

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26 Alexander Nobori
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