

1 my classroom during hot conditions. She says there isn't anything we can do about the heat problem,
2 so I've given up complaining.

3 8. We also don't have enough classroom space for the students. The small classroom
4 space especially affects my classes during the first four periods of the day when my class enrollment
5 is higher than that for the classes meeting later in the day. When we do a lab in class, I have to tell
6 the kids to leave their backpacks outside the classroom because we don't have enough space with
7 the kids moving around to have the backpacks in class. The kids complain that they don't want to
8 leave their backpacks outside because they worry that someone will steal from them. This winter,
9 we had a theft from the backpacks while they were outside during class. But I have to have the kids
10 put their backpacks outside anyway because we just don't have enough room in class for them when
11 we're doing lab work. And even if we're not doing a lab, I ask the students to put their backpacks
12 under their desks to conserve space. I have to walk very gingerly around and through aisle space to
13 monitor instruction throughout the day.

14 9. Brightwood has no handicapped facilities. The school is divided into two physical
15 areas connected by a series of concrete steps. There are no ramp facilities for wheelchair access from
16 the lower facility to the upper facility. The kindergarten through fifth grade classrooms are located
17 in the lower facility of the school and the sixth, seventh, and eighth grade classrooms are located in
18 the upper portion of the school.

19 10. It bothers me that there is no handicapped access to the school. All students and
20 teachers and staff should have access to all campus facilities with ease. Three years ago, we had a
21 severely disabled student who could not attend any school assemblies because it took her too long
22 to get around campus to reach the auditorium. So she was deprived of 100% of the school
23 assemblies. And last year, I had a student who sprained his ankle and had a cast on for about a
24 month or a month and a half. The student used crutches and had to hop up the stairs with assistance
25 from his classmates. He was often tardy to class because it was so difficult for him to get upstairs.
26 And for safety's sake, we had to dismiss him with a classmate early from his last period so he
27 wouldn't be knocked down the stairs by the crowd of other students going down the stairs to go
28 home. He lost about ten minutes of class instruction each day for that month or month and a half

1 during which he was on crutches.

2 11. The bathrooms at Brightwood are atrocious. We have an inadequate number of toilets
3 and urinals for the student population. There is only one boys' bathroom for the sixth- through
4 eighth-grade students. That bathroom has two toilet stalls and three urinals, which is supposed to
5 serve about 150 boys. Stall doors are nonexistent in many of the stalls, which makes privacy a
6 serious issue. Often, there is an inadequate supply of soap, toilet paper, and paper towels in the
7 bathroom. I buy soap and paper towels and give them to the kids to take into the bathroom when
8 they go.

9 12. The sixth grade portable classrooms do not have running water. Therefore, science
10 experimentation is limited to experiments for which water can be brought into the classroom;
11 students cannot perform any experiments for which they need running water. It is very evident to
12 me as an eighth grade science teacher that sixth grade students have experienced a lack of basic
13 science experimentation procedures. I have to do remedial work in my class because the students
14 didn't have running water in sixth grade and so couldn't learn what they should have learned before
15 coming to my class. I must spend three weeks at the beginning of every school year teaching
16 scientific methodology and laboratory basic skills as a means of remediation. Those three weeks
17 could be more productively spent on science instruction if the students had been as prepared as they
18 should be for my class.

19 13. The history books at school are antiquated. In the books, George Bush is still the
20 President of the United States. The books are more than ten years old.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing
22 is true and correct. Executed on April 29, 2000 at Rosemead, California.

23
24 
25 Kevin Soule