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DECLARATION OF LETICIA RAMIREZ

I, Leticia Ramirez, hereby declare:

1. I am the parent of Carlos and Richard Ramirez, who are plaintiffs in this action. I make this declaration based upon my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. The purpose of this declaration is to explain the unacceptable conditions that my sons endure at school including extremely high temperatures, spoiled cafeteria food, and very noisy classrooms.

3. [redacted] I have two sons at Bryant Elementary School, which is just down the street from where we live. Carlos is in fourth grade in Ms. Gilbert's class. Richard is in third grade in Mr. Sullivan's class.

4. Both Carlos and Richard often complain to me about the heat inside the school. The air conditioner does not work, and their rooms have often gotten extremely hot. They tell me that they get tired and have trouble paying attention in class because they are so hot. The heat makes the kids so sleepy that teachers often have to take breaks from teaching in order to try to revive the kids.

5. During summer school last year, Ms. Malabed and Ms. Polanco would often spray their classes, including Carlos and Richard, with water from a spray bottle in order to cool them down. One day last summer it got so hot that in the classroom that my son Carlos nearly fainted.

6. When Carlos nearly fainted, he could not visit the school nurse because the school does not have one. I worry about my sons' safety and health because the school does not have a nurse to help the children when they are sick or hurt. When children are not feeling well, the school simply has them call home for a parent to pick them up. This practice can make children miss more school than necessary.

7. My son Richard does not like to use the bathrooms at school because they smell bad and the toilets are often clogged. He often waits to use the bathroom until he comes home from school.

1 8. Neither of my sons Carlos or Richard will drink the water at school. The water from the
2 drinking fountains tastes funny. Carlos and Richard need to bring bottled water to school in order to
3 have clean water to drink during the school day.

4 9. Both my sons have complained to me about the food in the school cafeteria. Richard has
5 often complained of getting stomach aches from eating the school lunch. Carlos has said that some
6 of the food is spoiled.

7 10. Both of my sons have told me that they can hear people talking in other classrooms
8 because the school walls are so thin. Most of the walls are not real walls, but just thin room dividers
9 that hang from the ceiling. The distractions caused by noise from other classrooms makes it more
10 difficult for my sons to focus on what is going on in their own classrooms. Because of the
11 distractions, I am worried that the noise interferes with their ability to learn.

12 11. Because Carlos is in fourth grade and Richard is in third, they could both be in Ms.
13 Malabed's fifth grade class over the next two years. I want to ensure that my sons will not have to
14 suffer through extremely high temperatures while in school and that they will have their own school
15 books to take home to complete homework.

16 12. I am worried that the conditions at Bryant Elementary School are interfering with, and
17 will continue to interfere with, my sons' ability to obtain an adequate education. Although their
18 teachers are wonderful, the conditions are unacceptable and are keeping my sons from getting the
19 education that they need and deserve.

20 I declare under penalty of perjury of the laws of the State of California that the foregoing is
21 true and correct. Executed by me this 1st day of May, 2000 at San Francisco, California.

22
23 
24 Leticia Ramirez