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**DECLARATION OF MARIA ARREOLA**

I, MARIA ARREOLA, hereby declare:

1. I am the parent of Erika and Maria Hernandez, who are plaintiffs in this action. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

2. My daughter Erika is ten years old and in the fifth grade at Gulf Avenue Elementary School in Wilmington. My daughter Maria is fourteen years old and going into eighth grade at Wilmington Middle School.

3. I wish that my daughter did not have to attend Gulf Avenue Elementary School because of its unsanitary conditions. I tried to send my daughter to another school to avoid the bad conditions, but the district transferred her back to Gulf. I was very sad and worried that she had to attend Gulf Elementary School. Children should not have to endure such terrible conditions.

4. On one occasion, I dropped Erika off at school and went into the students' bathrooms. The bathrooms were filthy and covered with toilet paper. The toilets and bathroom stalls were destroyed and looked like they had not been cleaned for some time. There was no soap for the children to wash their hands and no paper towels for them to dry their hands. The entire area was completely unsanitary.

5. The drinking fountains were also dirty and unsanitary, covered with dirt and pebbles. I have repeatedly told Erika not to drink from the water fountains because they are so unclean.

6. The food at Erika's school is not handled in a sanitary way. I have seen the cafeteria workers use the same pair of gloves to clean dirty tables and then to open the children's milk cartons. I am afraid that if Erika eats or drinks at school she will get sick or vomit.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed on August 2, 2000 in Wilmington, California.

**MARIA ARREOLA**  
Maria Arreola

1   **DECLARACIÓN DE MARIA ARREOLA**

2                       Yo, MARIA ARREOLA, declaro por este medio:

3                       1.           Soy la madre de Erika y Maria Hernandez, quiénes son demandantes en esta acción.  
4                       Hago esta declaración basado en mi propio conocimiento personal y si estuvo llamada a atestiguar  
5                       lo podría y haría competente con lo siguiente:

6                       2.           Mi hija Erika tiene diez años y esta en el quinto grado en Gulf Avenue Elementary  
7                       School en Wilmington. Mi hija Maria tiene catorce años y acaba de entrar al octavo grado en  
8                       Wilmington Middle School.

9                       3.           No quería que mi hija asistiera a Gulf Avenue Elementary School por causa de las  
10                      condiciones antihigiénicas. Traté de mandar a mi hija a otra escuela para evitar las condiciones  
11                      malas, pero el distrito la transfirió de nuevo a Golf. Me sentía muy triste y preocupada que ella tuvo  
12                      que asistir a Golf. Los niños no deben tener que aguantar condiciones tan terribles.

13                     4.           En una ocasión, cuando la llevé a Erika a la escuela, yo entré a los baños de los  
14                     estudiantes. Los baños estaban asquerosos y cubiertos con papel higiénico. Los tocadores y las  
15                     paradas del baño estaban destruidos y parecían que no habían sido limpiados en mucho tiempo. No  
16                     había jabón para lavarse los manos ni toallas para secarse las manos. El área entera estaba muy  
17                     antihigiénica.

18                     5.           Las fuentes del agua estaban también sucias y antihigiénicas, cubiertas con suciedad  
19                     y guijarros. En varias ocasiones, le he dicho a Erika que no debería beber de las fuentes de agua  
20                     porque estaban tan sucias.

21                     6.           Las trabajadores de la cafetería se ocupan de la comida en una manera que no es  
22                     sanitaria. He visto a los trabajadores de la cafetería utilizar el mismo par de guantes para limpiar las  
23                     mesas sucias que para abrir los cartoneros de la leche de los niños. Tengo miedo que algun día, Erika  
24                     comerá algo sucio en la cafetería y estará enferma o vomitará.

25                     Declaro bajo de pena de perjurio de las leyes de los Estados Unidos y del estado de California  
26                     que el precedente es verdad y correcto. Ejecutado el 2 de agosto 2000 en Wilmington,  
27                     California.

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**MARIA ARREOLA**  
Maria Arreola

I, Erin Winkler-McCue, am a Legal Assistant for Morrison & Foerster LLP. I read, write, and speak Spanish fluently. I reviewed both the English and Spanish versions of the declaration of Maria Arreola, and the English version is an accurate translation of the executed Spanish declaration.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed this 31st day of August, 2001 in San Francisco.

*Erin Winkler-McCue*

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Erin Winkler-McCue