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**DECLARATION OF MICHELE CLEMONS**

I, Michele Clemons, hereby declare:

1. I am the parent of Laurel and Romana Clemons, 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. I originally executed the attached declaration on or about May 11, 2000.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed by me this 12 day of March, 2001 at Richmond, California.

  
Michele Clemons

**PLTF 00230**

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## DECLARATION OF MICHELE CLEMONS

I, Michele Clemons, hereby declare:

1. I am the parent of Laurel and Romana Clemons, 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. [redacted] I have two daughters who attend John F. Kennedy High School ("Kennedy" or "school") in West Contra Costa County. Laurel is in twelfth grade, and Romana is in ninth grade. I am also employed at Kennedy as a Special Education Assistant.

3. The purpose of this declaration is to explain the some of the unacceptable conditions that my daughters and other students endure at Kennedy, including classes without teachers for much of the year, and a limited number of bathrooms that are filthy and rarely stocked.

4. The teacher for my daughter Laurel's Advanced Placement ("AP") English class quit a few weeks into the school year. For approximately two months, the class was covered by substitutes who did not teach the students. Eventually, [redacted] was moved from my daughter Romana's ninth grade class to teach the AP English class, but had no lesson plans. Romana's class was then left without a teacher.

5. After [redacted] injured herself and could not continue to teach Laurel's class, more substitutes covered the class. Eventually, [redacted], a social sciences teacher, took over the class.

6. Laurel and several of her classmates are not taking the AP English exam because they do not feel prepared. Because they had no regular teacher, they were not able to learn the material that they needed to learn.

7. My daughter Romana's English class had no regular teacher from the time [redacted] went to teach Laurel's AP English class until [redacted] started teaching the class in January. The substitute teachers who covered the class during this time made no attempt to properly teach the class and, as a result, the students spent the period talking.

8. Romana's math teacher, [redacted], stopped teaching the class shortly after the beginning of the school year. Romana's class did not have a teacher until [redacted] was hired in

1 about January of this year. Substitutes filled in for the three to four months that Romana had no  
2 teacher. These substitutes did not teach the students any math nor did they assign homework.  
3 Rather, the students spent the class time socializing and doing puzzles.

4 9. Not having regular teachers has made it impossible for my daughters to learn in those  
5 classes. Laurel did not take the AP exam in English because she felt unprepared. Romana did not  
6 understand many of the questions on the math portion of the STAR test.

7 10. I am aware that many of the teachers at Kennedy have only emergency teaching  
8 credentials, and some have no teaching credentials at all. Most of the teachers have little or no  
9 experience teaching and have spent little, if any, time before a classroom of students before they  
10 teach at Kennedy.

11 11. While there are approximately ten sets of girls' bathrooms in the school, only three sets  
12 are open for the students to use. I am only aware of one boys' bathroom that is open. The bathrooms  
13 smell terribly, are covered with graffiti, and many lack toilet seats and doors to the stalls. Often no  
14 toilet paper or paper towels are available. Only two of six custodial positions at the school are filled.

15 12. The library has burnt spots on the carpet and is filled with mold. I believe that the mold  
16 in the library is a health hazard. In fact, I myself became sick when I attended meetings in the library  
17 over the course of a week. Additionally, the lighting in the library is very poor.

18 13. I worry about my daughters' safety and health because the school does not have a nurse  
19 to help the children when they are sick or hurt. When students are not feeling well, the school has  
20 them call a parent so that they can go home. The entire school district has two nurses, neither of  
21 which work at a school site.

22 14. I am worried that the conditions at Kennedy High School are interfering with, and will  
23 continue to interfere with, my daughters' ability to obtain an adequate education. The conditions are  
24 unacceptable and are keeping my daughters from getting the education that they need and deserve.  
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I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed by me this \_\_\_\_ day of May, 2000 at Richmond, California.

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Michele Clemons