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**Declaration of Eliezer Williams**

I, Eliezer Williams ("Eli Williams"), hereby declare:

1. I am one of the 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 am 12 years old, and I am in the seventh grade at Luther Burbank Middle School ("Burbank school" or "school").

3. I don't like to use the bathroom at school. The bathrooms smell bad and the toilets always clog up and overflow which leaves a lot of water on the floor. The toilets are not fixed on the same day. Additionally, the bathroom is often missing toilet paper, soap and paper towels. The water in the bathroom sinks is dirty and brown.

4. I don't like to drink the water from the fountains at school because the water tastes funny and looks discolored. I always bring bottled water from home to drink during the day at school.

5. The gym at Burbank school is very dangerous. The ceiling is missing about 20 or so tiles and other tiles are cracked, stained, and falling off. I am afraid that more tiles will fall off of the ceiling so I am always scared when I am playing ball in the gym. Additionally, a lot of the lockers in the dressing room are rusty or locked. There are not enough lockers in the dressing room for all of the students so I often have to share.

6. It gets very cold in class a lot. The heating doesn't work and sometimes I have to wear my coat in class. When it gets very cold, I find it hard to concentrate on what my teacher is saying.

7. We never have enough textbooks in the classroom and every day some of my classmates have to share a book. The textbooks that we use in class usually have missing covers and pages and they are from 1991.

8. Every week my teacher Mr. Nawa asks us to discuss current events with our families. Other than Mr. Nawa's assignment, I rarely have homework because I don't have a book to take home.

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9. The classrooms are very dirty and are not regularly cleaned. I have seen mice in the classroom. Additionally, the classroom windows are cracked and dirty and some are even missing. Sometimes the missing windows are boarded up, other times only blinds cover the broken window.

10. Although my teachers are wonderful, I really wish that Burbank school could provide me and my classmates with books and other learning tools. I want the opportunity to learn as much as I can and to learn in the best possible conditions.

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 25 day of April, 2000 at San Francisco, California.

  
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Eli Williams