

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF PATRICIA FIGUEROA**

I, PATRICIA FIGUEROA, hereby declare:

1. I am one of the plaintiffs in this action. I make this declaration based on my own personal knowledge and, if called to testify as a witness, I could and would do so competently as follows:

2. I am 13 years old and will be in eighth grade in the fall at Marina Del Rey Middle School in Los Angeles. I was in seventh grade there last year. For part of the sixth grade, I went to Crozier Middle School in Inglewood.

3. I make this declaration to describe the problems at Marina Del Rey Middle School and Crozier Middle School. I attended Marina Del Rey Middle School and Crozier Middle School and I know just how bad these schools are.

**Marina Del Rey Middle School:**

4. In my science class, I didn't have a teacher from February to May. We had many substitutes teaching the class, sometimes they would stay a few weeks, and sometimes we had a new one everyday. It was hard not to have a permanent teacher in the class and we didn't really learn anything. We didn't have a book in class or to take home, so there was no homework for us to do, or lessons to study. We finally got books in May, but only a class set. At the end of the year, the last substitute became our permanent health teacher, and he stayed until the end of the year. He was a really good teacher, but he was there for a few weeks only. Until we got the books, he would get information on the internet and at the library and make photocopies for us. We could not take the handouts home and had to give them back to the teacher at the end of the class.

5. The books we used in my math class were very old, probably from the seventies. They had graffiti, the pages were yellow, and some of them were missing the cover or were missing pages. I feel that if I had newer books I would have better support. It would show that the school cares about us, that they are pushing us to study and want us to succeed. Sometimes I feel like we are not important. I am really good in math, I get As and I got a really high score on the Stanford 9, but I feel like I could do a better job if I had a newer book.

6. In my English class the books are really old and we can't take them home. The pages

1 are yellow or even brown, and there are graffitis or names of students who have left the school a long  
2 time ago. The teacher complained and showed the books to the principal, but nothing was done and  
3 we did not get new books. Because we can't take the books home, we have to copy down the home  
4 work assignments from the book during class. It is really hard to study like that, and we lose a lot  
5 of time in class to copy down the homework. You have to write down the assignment really fast,  
6 and if you don't finish, then you can't do the whole assignment and can't get a good grade. I'd like  
7 to have the book at home to be able to take my time to read the assignment.

8           7. I would like all my classes to be like my social studies' class. The teacher is really  
9 good and has been at the school for a long time. I guess she knows how to get the materials from  
10 the district because she has been around so long. In that class we have enough books to take home  
11 and we also have a class set, so we don't have to carry the books back and forth. The teacher makes  
12 us cover the books, and they are in great condition. They are two years old, but they look like just  
13 out of the box. It is the only class I am entirely satisfied with because we have all the materials we  
14 need. All my teachers are really good, but in my other classes, we don't have everything we need to  
15 do our best.

16           8. There aren't enough bathrooms for the girls to use at my school. Only one main  
17 bathroom is open for us to use, the other main one is always closed. If you are in class on the other  
18 side of the school, and you really need to go to the bathroom, there is a smaller bathroom that is  
19 sometimes open. This bathroom is really dirty and smells really bad. There are no seat covers, and  
20 sometimes no toilet paper there.

21           **Crozier Middle School:**

22           9. The bathrooms at Crozier Middle School were terrible. I wouldn't even walk in  
23 there if I didn't have to. There was no toilet paper, no seat covers, and it smelled really bad. There  
24 were paper towels everywhere on the floor, the floor was always dirty and wet, and there was barely  
25 any light. It was dark and gloomy inside, and I didn't feel safe.

26           10. At Crozier Middle School, we didn't have any books to take home in any of my  
27 classes. In some classes we did not have a full class set, and we had to share the books in class with  
28 other students.

1 11. When I was at Crozier Middle School, we had to buy all the supplies like pencils,  
2 glue and paper with our own money.

3 12. Crozier was really overcrowded. The school was really small and there was more  
4 than twelve hundred students there. I really didn't like it there, and I wasn't getting a good  
5 education.

6 13. I think that better school conditions are important. Our parents support us. Our  
7 teachers support us, but the conditions don't support us, they bring us down.

8  
9 I declare under penalty of perjury under the laws of the United States and the State of  
10 California that the foregoing is true and correct. Executed on August 4, 2000 at Los Angeles,  
11 California.

12  
13   
14 PATRICIA FIGUEROA

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28