

1 our school just isn't equipped for all these students.

2 6. The bathrooms at our school are awful. We don't have enough for everybody, so
3 there are always long lines. Several of the stall doors in the girls' bathroom don't have locks. But
4 I'm grateful that in the girls' bathroom we have doors on our stalls at all, even if some of them don't
5 lock, because the main boys' bathroom doesn't have doors on any of its stalls. During my
6 sophomore year, I wrote an article for The Aztec that discussed the bathroom problem, but still the
7 boys' bathroom has no stall doors, and the girls' bathroom has missing locks for its doors. I've
8 attached the article I wrote as Exhibit A to this declaration.

9 7. The school does not have enough space for everybody to sit at lunch. We used to be
10 able to sit on the front lawn of the school in addition to the lunch court, but at the beginning of the
11 year there was a drive-by shooting in Monterey Park, so the school closed the front lawn and we
12 can't sit out there anymore. The classrooms and hallways are closed at lunchtime, too. So now we
13 all have to share the same lunch court at the same time. We don't have enough benches for
14 everybody to sit on. People just sit on the floor somewhere. It's really crowded for us all.

15 8. If we have a whole-school assembly, we have to go to the football field and have
16 everybody sit outside there. If it's raining, we obviously can't sit outside, so we have to just cancel
17 the assembly. When I was a sophomore, in 1998, the school canceled our end-of-year assembly
18 because it was raining and we didn't have anyplace else to hold the assembly.

19 9. The small gym at our school (we have two gyms) has ceiling tiles that fall in, which
20 makes it unsafe to be in the gym. I feel nervous just sitting in there. When I was a freshman, a
21 ceiling tile actually fell down during a basketball scrimmage. I have attached as Exhibit B to this
22 declaration an article from The Aztec describing the incident in which a ceiling tile fell my freshman
23 year. (I am Editor of the newspaper now and I have worked on the paper all my four years at Mark
24 Keppel, so I have saved all the copies of the newspaper.) Also, my March 1998 article describing
25 deteriorating conditions at Mark Keppel, attached as Exhibit A to this declaration, mentions the
26 falling ceiling tiles. And last year, there was a cover-page photo of our principal standing under the
27 gym ceiling in the Pasadena Star-News on April 28, 1999. The cover photo shows big holes in the
28 gym ceiling and the accompanying article describes the "much-needed repair" at our school. I have

1 attached as Exhibit C to this declaration a copy of the Pasadena Star-News cover story. The ceiling
2 tiles continue to fall now.

3 10. The electrical wiring at the school is inadequate. This winter, when a crew came on
4 campus to film a commercial about a bond measure that would have benefitted Mark Keppel, the
5 crew plugged their lights and equipment into an electrical outlet in my journalism class. Their
6 plugging equipment into our outlet tripped our electricity, and we had to recover our work on the
7 computers.. And in my speech class last semester, I saw the computer lab electricity blow out
8 several times when we were using the lab to write our speeches. We saved our work every few
9 minutes because we never knew when the electricity would blow out again.

10 11. In my printing class this semester, we don't have enough computers with Pagemaker
11 for everybody to use, so most of us are just doing printing the old way, by pasting up our copy by
12 using light tables. Nobody publishes anything the old way anymore, so we should be learning
13 Pagemaker and learning publishing the way it's done now. But our school doesn't have enough
14 equipment for us to learn what we could actually use today.

15 12. If anything breaks at the school, it takes an unreasonably long time to get it fixed. For
16 example, the heater went out in my Spanish class in the middle of winter last year and it wasn't fixed
17 for three or four months. I wore a heavy coat just for that class and then took it off for my other
18 classes where the heater did work. Also, when the lights go out in the hallways, they stay out for a
19 month or two before someone fixes them.

20 13. We feel a bad stigma about our school. When our athletic teams play at other
21 schools, people say things about Mark Keppel being a "ghetto" school or a "crappy" school. It just
22 feels really bad to go to this school when other schools in our district are in much better condition.

23 I declare under penalty of perjury under the laws of the State of California and the United
24 States that the foregoing is true and correct. Executed on April 3, 2000 at Monterey Park,
25 California. *May*

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27 Bichngoc Cao
Bichngoc Quach Cao

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DECLARATION OF BICHNGOC QUACH CAO

I, BICHNGOC QUACH CAO, hereby declare:

1. I am one of the plaintiffs in this action and if called to testify I could and would do so competently as follows:

2. I make this declaration to describe photographs I took of Mark Keppel High School in Monterey Park, California, where I am now a senior.

3. I took photographs of my school on April 13, 2000 and on April 14, 2000. I am familiar with the conditions portrayed in the photographs because I regularly see those conditions when I go to school every day. The photos accurately represent the conditions at my school on the days I took the photos.

4. One photo represents one of the 23 round lunch tables in our lunch court at school. I took that photo on April 13, 2000 at approximately 9:45 AM.

5. Another photo shows students sitting on the ground during lunch period at school because there are not enough round lunch tables and cafeteria space available for students. I took that photo on April 14, 2000, at approximately noon.

6. The two final photos show the gym ceiling at school, where there are many missing tiles. I took these two photos on April 14, 2000 at approximately 4:40 PM.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct. Executed on ~~April~~ ^{May} 3, 2000 at Monterey Park, California.

Bichngoc Cao
Bichngoc Quach Cao