

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 LINDA NOBORI

I, LINDA NOBORI, hereby declare:

1. I am the mother of John, Nicholas, and Alexander Nobori, all of whom are plaintiffs in this action.

2. I make this declaration based on my own personal knowledge, and if called to testify I could and would do so competently as follows:

3. My sons John and Nicholas are in eleventh and ninth grades, respectively, at Mark Keppel High School in Monterey Park. My son Alexander is in 8th grade at Brightwood Elementary School, also in Monterey Park. I have volunteered at Brightwood and Mark Keppel for the past 12 years, so I know both schools very well.

Mark Keppel High:

4. The bathrooms at Mark Keppel are totally inadequate. Not only are there simply not enough toilets at the school for all the kids, but also many toilets at the school don't flush and the sinks sometimes flood over. There are no bathrooms upstairs at the school. Downstairs, there is one bathroom for boys and one for girls and there is also another portable bathroom outside on the lunch court. In the indoor bathroom, there are no doors on any of the stalls in the boys' bathroom. The kids don't like to use the bathroom because they have no privacy.

5. The science rooms at the school are also totally inadequate. They look like they have not been upgraded in decades. The labs have inadequate sinks. The lab rooms are crowded with too many kids in them, and the sinks are disgustingly corroded which negatively affects the learning environment. The inadequate science facilities at Mark Keppel hamper my children's ability to reach their full potential in science because they are unable to do things they could do if they had better facilities.

6. The students are required to pay a \$5 lab fee per year for their science classes. The school sends home a letter asking for the \$5 for supplemental science materials.

7. There is no handicapped access to the second floor at the school. The math and science classes are basically on the second floor. If you are in a wheelchair and you go to Mark

1 Keppel, it would seem that you could not go to a regular math or science class on the second floor.
2 My son John was on crutches for a week a few weeks ago, and I was very concerned about the lack
3 of handicapped access to the second floor. He had to hop up the stairs to the second floor, and I
4 think that it was dangerous for him.

5 8. The ceiling tiles are falling in one of the two gyms at the school. About one third of
6 the ceiling tiles have fallen off already. The condition of the gym ceiling is a serious hazard.

7 9. The library is too small for all the kids at the school now. It is the original library from
8 when the school was built in the early 1930s or late 1920s, so it was designed for a much smaller
9 enrollment. There is not enough space for all the kids to study in the library and there are too few
10 computers for kids to use. The lack of a decent computer lab and woefully inadequate computers in
11 the library is a serious handicap to the students at Mark Keppel.

12 10. It is very sad to compare Mark Keppel High with San Gabriel or Alhambra high
13 schools, the other high schools in our district. Those schools are in lovely condition. It is grossly
14 unfair that one high school should lag so far behind other schools in the same district. Mark Keppel
15 is the worst school in the San Gabriel Valley and it is very hard for the kids to understand why their
16 school is in such disrepair. This creates emotional scars and feelings of deserving less.

17 11. Two years ago, the fire alarm system in the school was inoperative. Hopefully it has
18 been repaired by this time.

19 12. Maintenance has been scanty at the school. It seems to have been limited to only what
20 will keep the systems functioning in a patched together sort of way. Additional maintenance such as
21 painting has been done by parent and student volunteers.

22 13. There is no air conditioning at Mark Keppel in the main building and the classrooms
23 become very hot, hampering learning.

24 14. The lunch court area is inadequate for the students. It is small and overcrowded.
25 There is not enough seating and students have to sit on the ground to eat. The asphalt in the lunch
26 court is cracked and lifted due to tree roots and is a tripping hazard.

27 15. The auditorium is too small and does not meet the needs of the student population.
28 The seating capacity is too small and requires that assemblies be held in 3 separate very short one-half

1 hour sessions. A great deal of the seats are broken or missing in the auditorium. The lighting is very
2 poor. It is very difficult to read any printed material while in the auditorium.

3 16. There are additional amenities that are lacking at this school that are basic to a modern
4 school, such as an intercom system, securing computer facilities and inadequate internet access.

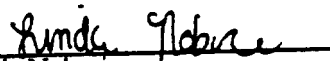
5 **Brightwood Elementary:**

6 17. Most of the classrooms at Brightwood have no air conditioning. The rooms get very
7 very hot. School starts in September, and those days are the hottest days of the year in Southern
8 California. Every year, typically from September to the beginning of November and from May until
9 June, the classrooms are too hot for children to learn comfortably. This year, we had a heat wave in
10 January and, so the children were suffering at school then, too. The classrooms become so
11 unbearably hot that the school asks children to bring water bottles to class to prevent heat exhaustion.
12 When it's 90 degrees outside it's over 100 degrees in the classroom for the kids. The children are
13 trapped in an unreasonable uncomfortable environment..

14 18. The kids can't learn when it's that hot in their classrooms. They can hardly stay
15 awake. I know from firsthand experience how uncomfortable the classrooms are because I often
16 volunteer at Brightwood. The kids can't focus on their schoolwork because of the heat. I have a
17 hard time grading papers in that heat, so it's hard for me to imagine how the kids can learn or write
18 their best.

19 19. Just like at Mark Keppel, there is no handicapped access to the second story at
20 Brightwood. Also, there is not adequate lighting on the stairways at the school. Alex fell down a
21 whole flight of stairs this year. The stairs leading to the second story, where the eighth grade classes
22 are held, are very very steep.

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 May 8, 2000 at Monterey Park,
25 California.

26
27 
28 Linda Nobori