DECLARATION OF PATRICIA FIPPS

I, PATRICIA FIPPS, hereby declare:

1. I am the mother of Catherine Fipps, who is a plaintiff in this action. I make this declaration based on my own personal knowledge, and if called to testify I could and would do so competently as follows:

2. I live on East Andrews Road in Fresno. I have three children at Morris E. Dailey Elementary School. Catherine is in fifth grade, Jason is in fourth grade, and Axel is in second grade.

3. I visit Dailey School often. During the fall semester, I volunteered in all three of my children's classrooms about once a month.

4. None of my children has textbooks to take home. Instead, they just bring home xeroxed copies of pages from books. Usually they each get one sheet a night to take home. Often, the kids don't get an explanation with the sheet they take home–they just get the assignment itself. It's hard for the kids to understand what they should be doing when they have no context and no pages to flip to so they can look up what they don't understand. The xeroxed sheets they bring home aren't even clear to me when I look at the sheets.

5. The school lacks basic supplies for children to use to learn. There are often no crayons, no pencils, and no paper in my children's classrooms. I have asked the teachers what they need and then bought those supplies–crayons, pencils, and paper–to supply the classrooms at the school. It's a real hardship for me to buy the supplies for the whole classes, however, because I am a full-time student and also a single mom with three kids. I know it's a hardship for the teachers to buy the supplies as well–I'm constantly hearing teachers say at PTA meetings that the teachers buy supplies out of their own pockets.

6. The heat goes off and on in all three of my children's classrooms. And at the beginning of the year, the air conditioning was broken and it's very hot in Fresno in September. Then in December, the heater broke in Axel's class. For two weeks, children in his class wore coats inside all day during school. Axel got sick.

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7. The bathrooms at the school either are locked so kids can't get in or are so gross the kids don't like to use them. The bathrooms in the "pod" part of the school are always locked so the kids have to walk far to get to another bathroom. And the other bathrooms are filthy.

8. Once this year, in the middle of February, my fifth-grader, Catherine, wet her pants at school because she couldn't get into a clean bathroom. She went to one bathroom but it was locked so she couldn't get in. Then she couldn't make it to another bathroom. She was humiliated and I had to come pick her up from school.

9. The water fountains at the school often don't work. The toilets have backed up into the water fountains, and the stench is just awful. My children take bottled water to school so they will have safe water to drink.

10. In the middle of this school year, the district transferred our principal and then Dailey School didn't have any principal at all for months. One day in December we got a note home saying the principal was transferring to another school, and then only maybe one day after the note went home, the principal left. It's pathetic that our school didn't have a principal for months.

11. I have complained about the lack of books and supplies and about the heat and air conditioning problem to the principal, the vice-principal, and the school district. They say they know I'm upset and that the kids can read anytime they want because the libraries are open.

12. I don't want my children to be stupid or inept because they didn't learn what they should have learned in school. I want the school to have books so the children can do real homework and understand their work. And I want the bathrooms and heat and air conditioning and water fountains to work so the kids can keep their minds on their learning and not worry about anything else.

I declare under penalty of perjury of the laws of the State of California and the United States that the foregoing is true and correct. Executed on April 12, 2000 at Fresno, California.

Patricia Fipps