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DECLARATION OF LUZ ARRIOLA

I, Luz Arriola, hereby declare:

1. I am the parent of Bibiana and Bianca Arriola, who are 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. Both of my daughters are students at Bryant Elementary School ("school"). The school is located in the Mission District in the city of San Francisco.

3. The purpose of this declaration is to explain the unacceptable conditions that my daughters endure at school including lack of books and other teaching materials, extremely high temperatures, spoiled cafeteria food, and unsanitary bathrooms.

4. I visit the school often, sometimes while school is in session. I pick up my daughters from school every day.

5. My daughter Bianca is in Miss Ma's first grade class. Miss Ma has informed me that throughout the school year she has been missing about half of her entire curriculum. She has had to try to piece together lessons for the kids by using library books and borrowing from other teachers. This is not as easy as it sounds because Miss Ma's class is the only first grade class taught in English at Bryant. She is a very dedicated and concerned teacher, but the State is not ensuring that she has the materials that she needs to teach my daughter and the other children. I am disgusted and outraged by the lack of materials and the apparent lack of concern on the part of the State. My daughter Bianca is very bright and is therefore doing well in school, but she is still being cheated by the lack of books. Without all of the materials, Miss Ma can't be sure that Bianca is getting all of the information that she needs to perform well in school and on tests.

6. My daughter Bibiana is in Miss Malabed's fifth grade class. Bibiana has also not had enough class materials. She frequently has to share textbooks with other children in class and cannot bring all of her books home to do homework. For months, Bibiana had to copy her math homework off of the chalkboard on to a piece of paper because she did not have a math book to take home. I am

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1 concerned that not being able to take her books home is hurting her education. For example, if she
2 has a question on a math problem, she can't review the lesson without a book.

3 7. Both of my daughters complain about the temperature in the school. The school's
4 temperatures are frequently too hot and my daughters become extremely uncomfortable. When it is
5 hot, my daughters become sweaty and sticky. I send both girls to school with bottled water to combat
6 the heat. I know that my daughters have difficulty concentrating in class because of the temperature.
7 Bibiana puts her head down on the desk to rest and Bianca becomes very lethargic. I don't
8 understand how the children are supposed to learn effectively when they are so uncomfortable.

9 8. The school does not have enough money to support regular art and music classes. I feel
10 that this is a disservice to the students because exposure to the arts is essential for a well-rounded
11 education.

12 9. My daughters will not use the bathrooms at school because they are dirty and the doors
13 on the stalls do not shut or latch properly. Thus, my daughters do not feel secure using the
14 bathrooms. Bianca has had several accidents at school because she refuses to use the school's
15 bathrooms. Bianca never has accidents at home or anywhere else. Both of my daughters use the
16 bathrooms right before we leave for school in the morning and immediately when we get home.

17 10. The food provided in the school cafeteria is spoiled and usually smells and looks bad.
18 One time, Bibiana complained to the principal that the hot dogs looked funny because they were dark
19 red and the principal replied that it was just food coloring. Other times the lunch meats have green
20 spots that I assume are mold. I worry that my daughters are not receiving adequate nutrition at
21 school.

22 11. I am outraged that, at the very least, the school cannot provide clean bathrooms and
23 proper food. I send my daughters to school each day so that they may obtain an education. The
24 conditions at the school are impeding their education and if they are not learning, then there is no
25 reason to send them. My daughters are not receiving the education that they need and deserve.
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1 I declare under penalty of perjury of the laws of the State of California that the foregoing is
2 true and correct. Executed by me this 12 day of May, 2000 at San Francisco, California.
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6 Luz Arriola
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