

**DECLARATION OF LINDSAY HERSHENHORN**

I, LINDSAY HERSHENHORN, hereby declare:

1. 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 work as a reading specialist at Paul Revere Elementary School in San Francisco. This is my first year working as a reading specialist. Before this year, I taught first grade for two years at Paul Revere, and for two years before then I taught at other schools.

3. The whole second floor of the annex building where I teach has insufficient heat. One day during the week of February 12, several other teachers and I looked at a thermometer one of the teachers has in her room for instructional purposes, and we saw that it was 44 degrees inside. We had heat on the first floor that day, but we had no heat on the second floor. My room is so frequently cold that I've bought a space heater and that's what I use to heat my room. The children who come to my room for reading groups almost always wear their coats. I've sometimes worn a coat during class, but it's uncomfortable to teach in a coat, so I usually wear layers to try to keep warm. I know that other classrooms at the school are also very cold because I do cafeteria duty and I see teachers coming into the cafeteria from their classrooms in their coats. The room I teach in used to be a closet and was not intended to be an instructional space, and I believe that is part of the reason that the school heating system does not effectively heat my room. In addition, the metal on the edges of the three windows in my room has corroded and so the windows do not shut properly. The little heat that comes into the room through the vents is not helped by the open windows. Maintenance has come to my classroom at least twice this year, but still the classroom is too cold.

4. I spend about \$700 each year buying supplies for my room and photocopying work assignments for the children. I have to buy most of my core materials myself because the district warehouse does not provide materials that match the activities in the district-adopted curriculum. For example, the adopted curriculum requires supplies like chart paper, magnetic letters, post-its, index cards to use to make flash cards, and sentence strips, but the district warehouse does not supply those items or does not effectively distribute them to school sites so

1 that they are available to teachers throughout the school year as needed. I have spent about \$500  
2 this year just buying those supplies. I also spend about another \$200 each year making copies for  
3 my class because our school copiers rarely work because they are so overused. We have one  
4 copy machine in each building, each of which must be shared by about 20 teachers plus  
5 secretaries and other staff. I have had to go to Kinko's to copy homework for the kids because  
6 both copiers were not working.

7 5. The bathrooms next to my room have flooded twice this year because the toilets  
8 overflowed. Water seeped into my room from the flooding, and ruined five of the boxes children  
9 used to keep their journals and reading books in. I buy those journals and books with my own  
10 money, and I had to buy new ones to replace the kids' ruined ones after the flooding. In addition,  
11 each time the flooding happened, I could not run reading groups because I had to go find  
12 custodians to perform the necessary repairs.

13 6. Our school district has a shortage of substitute teachers, so we sometimes don't  
14 have a substitute when a teacher is absent. When that happens, we have to split classes up, so  
15 that a few children will be placed in another teacher's class for the day, and a few other children  
16 will be placed in still another teacher's class for the day, and so on. When we have had to split  
17 classes up like that because we do not have substitute teachers, we have sometimes had to place  
18 children in the wrong-grade classrooms, for example by placing a first-grade child in a second-  
19 grade class for the day. It's really a problem at our school that we do not have anything extra to  
20 rely on when a teacher is absent or some other staffing shortage occurs.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 30, 2001 at San Francisco, California.

  
Lindsay Hershenhorn