

1   **DECLARATION OF SUSANNAH FLICKER**

2           I, SUSANNAH FLICKER, hereby declare:

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

5           2.       I teach second grade at Paul Revere Elementary School in San Francisco. This is  
6 my first year teaching second grade, and I completed my teaching credential in December of this  
7 school year, after spending a semester teaching my second-grade class. Last year, while I was  
8 still working on my teaching credential, I student taught first grade at Paul Revere under the  
9 supervision of another teacher.

10          3.       I was assigned to a tiny room in the basement for this school year. When I first  
11 saw the room, I was shocked. The room is way too small for a classroom, and it was not in fact  
12 built to be used as an instructional space. It was used as a teacher's lunchroom before the school  
13 turned it into a classroom about three years ago. I measured the room, and it is about 21 feet  
14 wide and 21 feet long, with a small 10 foot by 9 foot area in the back of the room that I use as a  
15 library corner and listening center. In the main part of the room, I also have a hazardous kitchen  
16 unit taking up instructional space by sticking out two feet into the room and running about five  
17 feet long. The room has really small windows with very little natural light, which does not help  
18 the room feel any larger. The room is so small that even though I have fewer than 20 students in  
19 the class, still the space between the tables is totally blocked if a kid pushes his or her chair out. I  
20 have a class rule that students must push their chairs in, but I feel like in a normal classroom it  
21 wouldn't matter if a kid forgets to push a chair in. As it is, we have a fire hazard if the chairs are  
22 out. I trip over the chairs myself when I'm walking around the room, and, as an adult, I am more  
23 coordinated than the second-graders I teach.

24          4.       In addition to having less class space than other classrooms have in the first place,  
25 I also have a hazardous old metal kitchen unit in my classroom that takes up space that we could  
26 otherwise use for small reading and working groups. The old metal unit is on the lefthand wall  
27 of the room and is attached to the floor and to the wall and has cabinets, a stove, an oven, a  
28 small-sized refrigerator, and a sink. When I first started preparing my room for the new school

1 year, the refrigerator was making a loud buzzing sound and was turned on but was not at all cold.  
2 It was also vile because it was full of black mold that just looked like liquid nastiness. I scrubbed  
3 out the inside of the refrigerator and turned it off because the noise would be too distracting to  
4 have in the classroom during lessons. So the refrigerator itself is not at all useful to the  
5 classroom and is a safety hazard with young children around it. Although we use the stove and  
6 the oven for cooking projects about once a month, I worry about the kids' safety around those  
7 appliances, too. The unit is very old and if the knobs are touched or bumped into even very  
8 slightly, the burners go on. It's very hazardous to have that unit in the room with second graders.  
9 I had to buy my own burner covers and to fashion velcro fabric covers for the knobs to try to  
10 keep the children safe around the stove and oven. In addition, the metal unit takes up quite a bit  
11 of space in the classroom, sticking out a couple of feet into the room, and it would be a lot better  
12 for us not to have the unit in the room. If we did not have the unit in the room, I could put a table  
13 there so I could work with the students in small groups, which I do not have enough space to do  
14 now. Last fall, I made calls to the facilities management office for the district to see if the unit  
15 could be removed, but the person told me to call student nutrition services. I explained that the  
16 issue was not a nutritional one but instead that I had a safety hazard in my room, but I got  
17 nowhere.

18           5.       Temperature at Paul Revere has been a serious problem this winter, and was most  
19 severe for most of December and all of January. It was incessantly cold in my basement room  
20 during those months, and other teachers told me it was cold in the rest of the school as well. On  
21 two or three days during the cold months, I called the school secretary to ask her to put in a call  
22 to the district to fix the heat. She told me she knew the building was cold and that she'd called  
23 the district and still nothing happened. The other teacher who teaches in the basement with me  
24 also told me she called several times to have the heat fixed. Finally, a few weeks ago, the school  
25 district sent someone to look at our heat system and it's been a lot warmer in my classroom since  
26 then. One day in early February, it did get so cold in the school that several other teachers told  
27 me that when they looked at a thermometer in one of the teacher's classroom, they saw that it  
28 was 44 degrees inside. But generally it's been warm enough in my room finally that I've been

1 able to take off my coat, hat, and scarf while I'm teaching. During December and January I wore  
2 my coat, hat, and scarf almost constantly while I taught. It was that kind of cold where you just  
3 don't warm up. Some of the kids would also keep their jackets and even their hoods on because  
4 of the cold. The cold affected my ability to teach because when I'm cold and bundled up it's  
5 hard to move around. The cold is just debilitating and it got my spirit down.

6         6.         We have a flooding problem in the hallway in the basement. The basement has  
7 two outside doors that lead into the yard where the kids play, and every time it rains hard, water  
8 seeps into the hallway through those doors. When that happens, the kids can't use the water  
9 fountain that's there because the water pools on the floor where the water fountain is located.

10         7.         The school has not provided me with all the materials I need to teach my class.  
11 For example, I do not have a teacher's edition of the social studies textbook we're supposed to  
12 use. In addition, for the first half of this school year, I did not have essential parts of the district-  
13 adopted Mathland curriculum. The Mathland curriculum involves materials called  
14 "manipulatives" that come in big tubs. "Manipulatives" are the hands-on materials children use  
15 to learn math in the Mathland curriculum, including plastic dinosaurs for counters, geometric  
16 pattern blocks, plastic cubes, and dice for probability. You simply cannot teach Mathland  
17 without the materials that come with it, but yet it took until about a month ago for me to get the  
18 materials for my class. The school ordered a set of the materials for me at the beginning of the  
19 school year, but the materials just arrived halfway through the school year, so for the first half of  
20 the school year I had to borrow from another teacher to teach the district-mandated curriculum.  
21 The school also does not provide pocket charts and other tools that are required for teaching  
22 basic skills. For example, in order to teach literacy-related material in the way I was trained by  
23 my credentialing program and in the way our school is directing us to teach and the way research  
24 tells us it works to teach, pocket charts are very necessary. I have borrowed four pocket charts  
25 from the teacher who was my mentor teacher last year. I have one pocket chart set up as a center  
26 holding a poem we've read together as a class. The poem is written on sentence strips and the  
27 kids can restructure the words to figure out how the poem works and word order and can turn  
28 words around to have other kids logically guess the missing word. I don't know how I would

1 teach basic literacy skills without the pocket chart.

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3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct. Executed on March 28, 2001 at San Francisco, California.

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Susannah Flicker

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