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Eliezer Williams, et al.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

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COUNTY OF SAN FRANCISCO

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23 ELIEZER WILLIAMS, a minor, by Sweetie
Williams, his guardian ad litem; et al., each
24 individually and on behalf of all others similarly
situated,

25

Plaintiffs,

26

v.

27

28 STATE OF CALIFORNIA; DELAINE EASTIN,
State Superintendent of Public Instruction;

No. 312236

[CLASS ACTION]

**DECLARATION OF NADIRAH
MORELAND**

1 STATE DEPARTMENT OF EDUCATION;
2 STATE BOARD OF EDUCATION,

3 Defendants.
4

5 I, NADIRAH MORELAND, hereby declare:

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

8 2. I have been a teacher at Oakland Technical High School in Oakland, California
9 ("Oakland Tech"), for four years. I teach government and economics to twelfth-grade students, and
10 world cultures to tenth-grade students. This year I will teach government and economics to twelfth-
11 grade students and an elective course for tenth-grade students.

12 3. I have a California clear single-subject social studies teaching credential.

13 **Oakland Technical High School**

14 4. Each school year, many classes at Oakland Tech begin the year with no permanent
15 teacher. Students in those classes are taught by a series of substitute teachers and permanent teachers
16 who fill in during their preparation periods. Children in classes that lack permanent teachers are more
17 likely to skip class because they feel like the school does not think that they are important. When the
18 school does not have enough teachers to cover each class, it assigns permanent teachers to the
19 advanced classes, and substitute teachers always go to the lowest level classes.

20 5. There are often no substitutes to fill in for teachers who are out sick. Instead, other
21 permanent teachers are asked to fill in for their colleagues during their break periods. Last year, I
22 filled in for absent teachers several times each semester because the school failed to hire substitute
23 teachers to fill short-term vacancies. The school district discourages teachers from participating in
24 training and professional development that happens during the school day because there is a shortage
25 of substitutes to fill in for absent teachers.

26 6. During the 1997-1998 school year, my class was held in a basement room that had
27 formerly been used as a teacher's lounge. The room had few windows and no natural light. The
28

1 room was very cold in the winter because there is a dysfunctional heating system at the school. My
2 students wore gloves, hats, and scarves inside the classroom because of the cold.

3 7. During the 2000-2001 school year the heating and air conditioning system blew cold air
4 into my classroom in April, even though it was cold outside. The cold air made it extremely difficult
5 to enforce the school's no-hat rule, because students wore hats in the classroom in order to stay warm.


6 8. The student bathrooms are often locked. By the end of the 2000-2001 school year, only
7 one bathroom was open for 1700 students. Many children leave campus and go home or to Burger
8 King to use a bathroom. In order to use the other bathrooms at school, students must find one of the
9 security guards to open the bathrooms for them.

10 9. During my first year teaching, in 1997-1998, at least one third of my 65 twelfth-graders
11 were not given a book to use in class. Those students had to either share books with other students in
12 their class, or find someone in another class to share books with. This was a problem in all of the
13 twelfth grade government classes at the school.

14 10. The world history textbook used by my students up until the 2000-2001 school year was
15 almost ten years old, and the material in the book was outdated. The book had maps and references
16 to the Soviet Union, and the last leader of the Soviet Union mentioned was Gorbachev. Eastern
17 Germany and Western Germany were represented as separate countries. The most recent
18 development in the Middle East conflict mentioned in the book was the Camp David Accord in 1979.
19 The book did not address the globalization of the economy or the European Union. I had to
20 supplement the book with outside material in order to give my students a basic context for
21 understanding the post-cold war world and economy.

22 I declare under penalty of perjury under the laws of the United States and the State of
23 California that the foregoing is true and correct. Executed this 1st day of August, 2001, in Oakland,
24 California.

25
26 By: _____



Nadirah Moreland