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17 Attorneys for Plaintiffs
Eliezer Williams, et al.

18 SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 COUNTY OF SAN FRANCISCO

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

23 Plaintiffs,

24 v.

25 STATE OF CALIFORNIA; DELAINE EASTIN,
State Superintendent of Public Instruction;
26 STATE DEPARTMENT OF EDUCATION;
STATE BOARD OF EDUCATION,
27

28 Defendants.

No. 312236

[CLASS ACTION]

DECLARATION OF JONAS
ZUCKERMAN

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I, JONAS ZUCKERMAN, hereby declare:

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

2. I teach English and History to ninth and tenth graders at Oakland Technical High School in Oakland, California, where I have taught for one year. Before teaching at Oakland Technical High School, I taught at Golden Gate Elementary School in Oakland for nine years. I primarily taught 3rd grade, but also taught 2nd grade, 5th grade, and 6th grade (before the school became K-5).

3. I started teaching in Oakland as part of the Teach for America program. I began as an emergency credentialed teacher and have since earned a Professional Clear teaching credential.

Oakland Technical High School

4. For approximately six weeks in the winter of 2000-2001, there was no heat in my classroom. My classroom was so cold that the students and I wore gloves, coats and hats all day to keep warm. In two of my English classes, I was teaching the students about satire. As part of that lesson, the students wrote thank you notes to the administration for the lack of heat. Although I try to incorporate the school's problems into our lessons, it is inevitable that the lack of heat is very distracting for the students. Without adequate warmth in the classrooms, students have a harder time concentrating on their studies.

5. Oakland Technical High School has experienced a high rate of turnover in administration. In just the one year that I have been teaching at Oakland Tech., there have been three different principals. I was hired by one principal, worked under a second principal, and a third is taking over this Fall. This lack of continuity is demoralizing for the teachers and has meant that none of the problems at the school have received sustained attention. The lack of stability in the school's administration has been taxing for the students as well. A school principal embodies the identity of a school and serves as the school's central authority figure; with a constantly changing administration, students have a difficult time taking a new principal seriously and respecting his or her authority. The students have little reason to believe that the principal has a long-term investment in them or in their school.

1 **Golden Gate Elementary School**

2 6. For a portion of almost every winter of the nine years that I taught at Golden Gate,
3 ending in the 1999-2000 school year, there was no heat in the classrooms. For weeks at a time, the
4 classrooms were so cold that the students wore gloves, scarves, hats, and coats all day long. The lack
5 of heat is distracting for younger students. Without adequate warmth in the classrooms, students
6 have an extremely difficult time concentrating on their studies. It was also difficult for teachers to
7 concentrate. In fact, one of the teachers regularly wore earmuffs during the winter months.

8 7. For the approximately 325 children who attend Golden Gate, there were only two
9 bathrooms – one for the boys and one for the girls. There were two additional bathrooms at Golden
10 Gate; however, those two bathrooms were locked during most of the entire nine years that I taught
11 there. From my classroom to the boys' bathroom, it was approximately ten minutes round trip which
12 meant that students were not learning during that time.

13 8. Golden Gate Elementary has a library; however, because there was no librarian on staff,
14 students were not allowed access to the library.

15 9. Another significant problem at Golden Gate is the high rate of teacher turnover. Every
16 year that I was there, about one quarter of the teachers left the school and were replaced by beginning
17 teachers. This constant turnover meant that there were few teachers with school-specific or district-
18 specific experience. The lack of institutional memory was problematic for both teachers and
19 students. New teachers inherently lack familiarity with other teachers and staff and with the school's
20 traditions and practices. While teachers were supportive of each other, the high numbers of new
21 teachers each year made it difficult to build a support network which would adequately address new
22 teacher needs. This was very demoralizing for teachers and undoubtedly contributed to the turnover
23 at the school. The high turnover rate was a vicious cycle that made it hard for teachers to be
24 effective.

25 10. Students were further harmed by the high turnover rate at Golden Gate because very
26 rarely were the departing teachers replaced by experienced teachers. In fact, in most of the nine years
27 that I taught at Golden Gate, at least one of the incoming replacement teachers had no teaching
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experience at all. The students at Golden Gate lack the advantages of learning in an environment where experienced teachers challenge each other with new and different ideas after years of practice and testing of teaching techniques.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct. Executed this 8th day of August, 2001, in Oakland, California.

By: Jonas Zuckerman
Jonas Zuckerman