

1 I, Matthew Anderson, declare and state:

2 1. I am a teacher at John C. Fremont Senior High School in Los  
3 Angeles, California. I have personal knowledge of the matters set forth in this  
4 declaration, and if called upon to do so, I could and would competently testify  
5 to the matters set forth herein.

6 2. The purpose of this declaration is to describe the conditions at  
7 Fremont High School. This is my third year at Fremont, and I currently teach  
8 tenth and eleventh grade English.

9 3. I began teaching at Fremont High School in September, 1999. I  
10 was assigned to teach Algebra, even though I am not a math teacher. I began  
11 teaching Algebra two months into track C, which begins in late July. Before I  
12 became their teacher, the students told me that they had about eleven substitute  
13 teachers. They had not covered much material, and I did the best that I could to  
14 teach the students the basics. I taught Algebra for two months, from September  
15 to October.

16 4. Starting in October, 1999, I began teaching ninth and tenth grade  
17 English. My English classes were held in a bungalow. I taught in the  
18 bungalow from October to December, 1999. The bungalow was purchased used  
19 from another school. It was not properly wired, so our electricity came from a  
20 big diesel generator outside. The generator would run out of fuel on a weekly  
21 basis, so at least once a week we would have no lights. Sometimes the problem  
22 would be resolved that day, but usually we would not have light until the next  
23 morning. One time, my class went without light for three days. The bungalow  
24 had three small, dingy windows on one side. I would have the kids move theirs  
25 desks closer to the window so they could see better. Although I like to teach  
26 using an overhead projector, I did not use one in the bungalow because I never  
27 knew when the electricity would go out which would have scrapped my lesson  
28

1 for the day. I also could not work in the bungalow past four o'clock because  
2 the electricity would be turned off.

3         5. The bungalow was infested with termites. The termites would  
4 chew holes in the walls, and when it got hot, hundreds of termites would start  
5 dropping to the floor. This was a huge distraction for my students. A few  
6 times I had to stop class and get everyone to stomp on the termites to stop them  
7 from crawling all over the place. One of my students came up with the idea of  
8 blocking the holes with chewing gum. The problem was that once we blocked  
9 one hole, another one would appear. I called maintenance approximately three  
10 times about the termite problem. About four weeks later, a maintenance man  
11 came to inspect the bungalow. He bounced on the floor and agreed that the  
12 termites were causing structural damage to the bungalow and then left. Apart  
13 from this inspection, I never saw anybody do anything to get rid of the  
14 termites. The problem was never resolved while I taught in the bungalow.

15         6. During my two months teaching in the bungalow, between October  
16 and December, 1999, we had two rainy days which caused substantial leaks in  
17 the roof. Maintenance brought in large tubs and trashcans to catch the  
18 rainwater. We also had to move some of the students' desks so they would not  
19 get wet.

20         7. The bungalow did not have proper heating. In the mornings, the  
21 room was really cold. On three or four occasions the thermostat read at or  
22 below fifty-five degrees. On those days, I took the students somewhere else,  
23 like the library or cafeteria, and had class there. However, that was a problem,  
24 too, because other classes would also be there. I would have to yell so that my  
25 kids could hear me over the other teachers and students. I also did not have  
26 chalkboard space in the library or cafeteria. If it was warmer than fifty-five  
27 degrees, we would just stay in the room. I told the kids to bring jackets and  
28 mittens to stay warm. I also kept some extra jackets in the room to lend to the

1 kids. The school gave me a nine-inch by nine-inch heater, but all it did was  
2 blow cold air at my students. Our body heat warmed the room more than that  
3 heater.

4 8. The bungalow also did not have air-conditioning. Some days it  
5 would get really hot in the afternoon. 6th period was the worst. The heat  
6 would make my students sleepy, and I had a hard time getting them to  
7 concentrate.

8 9. Another problem with the bungalow was the noise. When the  
9 generator was running we could always hear it. Then there was the band. Our  
10 school has a great band with lots of members and they practiced during 6th  
11 period behind the bungalow. During 6th period when it would get really hot, I  
12 would want to open the door to let some fresh air in. When I did that noise  
13 from the band would come in along with the air. Basically, it was a choice  
14 between excessive heat or excessive noise.

15 10. There was no intercom in the bungalow. At the time I was teaching  
16 in the bungalow, there were announcements on a daily basis. The  
17 announcements included information about school events, SAT prep courses  
18 and colleges that would be visiting the school. Without the intercom, my  
19 students were cut off from school-wide announcements. Also, if there was ever  
20 an emergency, we would not have known about it.

21 11. I have also had problems getting sufficient textbooks for my  
22 students. I only had one class set of textbooks in the Algebra class I taught  
23 from September to October, 1999. Therefore, my students could not take the  
24 books home to do homework. This meant that I would have to make time each  
25 class period for the students to copy homework problems off of the board. This  
26 would take about fifteen minutes away from the time I had to teach them.

27 12. In my English classes, I prefer to teach using novels rather than  
28 textbooks. The school does not always have the novels I want to use. At the

1 beginning of each track I find out what books are available and check them out.  
2 This year I wanted to teach Richard Wright's Native Son or Black Boy to my  
3 eleventh graders. When track C first started, in August, 2001, I could not get  
4 enough copies of either book, so I ended up having to teach Black Like Me,  
5 even though I had never taught that novel before. Not knowing what novels  
6 will be available until the last minute causes problems because I cannot plan  
7 my lessons during my time off-track.

8 13. Also this year, I wanted to teach All Quiet on the Western Front to  
9 my tenth graders. However, because the school could not get me the books, I  
10 had to have each of my students come up with six dollars to purchase their own  
11 books. Many of the students could not come up with the money. My Cross-  
12 Country team was selling candy to raise money for team uniforms, so I  
13 extended that offer to my tenth graders, as well. Six dollars may not seem like  
14 much of a hardship, but for many of my students it is.

15 14. The furniture at Fremont High is substandard. One of my English  
16 classrooms in the main building had mismatched plastic chairs and folding  
17 tables full of tagging. My mother once came to Fremont High to watch me  
18 teach. Before coming to the school, my mother had gone to Honduras to build  
19 homes for Habitat for Humanity. She told me that the schools in Honduras  
20 were in better condition than Fremont High.

21 15. I also had a problem with missing furniture. Not all of the  
22 classrooms had enough tables and chairs, so sometimes people from other  
23 classrooms would take some of our desks and chairs. I would have to send one  
24 of my students out to hunt down the furniture so all of my students would have  
25 a place to work.

26 16. The classrooms at Fremont High are often dirty. For example, one  
27 of my classrooms was used several times a week in the evenings for night  
28 school and would not be cleaned afterwards. Also, it seems that the classrooms

1 do not always get swept on a regular basis. I often have to sweep my classroom  
2 myself because it gets so dirty.

3 17. Fremont High is a Concept 6 multitrack year-round school. The  
4 students therefore attend less days of school, but each day lasts about one hour  
5 longer. The students become very tired toward the end of the school day. It is  
6 rare to have a sixth period class where the students are as focused and involved  
7 as the earlier periods. It is harder to teach and get through the material  
8 because the students are not mentally present. Also, the Concept 6 system  
9 leaves teachers with less nights to assign homework.

10 18. Finally, Fremont High does not have a good copier for the teachers  
11 to use. We used to have a walk-up copy machine that we could use in the  
12 Bilingual office, but it broke down a lot and we cannot use it anymore. If  
13 teachers need to make copies, we need to get it to the Bilingual office workers  
14 three days in advance. The problem is that sometimes while I am teaching, I  
15 will suddenly come up with an idea for a worksheet to help students understand  
16 the material better. Of course, by then it is too late to get copies made. There  
17 is also a copier in the library, but it breaks down so much that you cannot rely  
18 on it. One time the copier did not have toner for two or three weeks because  
19 the district had not paid the toner contract. I often end up getting copies made  
20 at Kinkos. I spend at least \$200 a year of my own money to make copies for  
21 my students.

22  
23 I declare under penalty of perjury that the foregoing is true and correct,  
24 and that this declaration was signed on the 7<sup>th</sup> day of December 2001, in Los  
25 Angeles, California.

26  
27   
28 Matthew Anderson