

1 I, Jenna Wiggernhorn, 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, where I am in my fifth year as a teacher, and currently
8 teach ninth grade on track "C."

9 3. Fremont High School lacks basic educational materials, such as
10 books and photocopied materials, for its students. Many classes at the school
11 do not have enough books to assign each student a book to use in class and to
12 take home. For example, math, science and social studies classes typically do
13 not have enough books for the students to take home for homework. Instead,
14 these classes provide textbooks for in-class use only. This year, I do not have
15 any textbooks for my life skills class, which is a course required by the State of
16 California for graduation. One of my colleagues, Chuck Olynyk, who teaches
17 advanced placement ("AP") social studies, did not receive his class books for
18 last year until two weeks before the AP test, which was given in May.

19 4. I spend about \$200 per month of my own money to buy books,
20 markers, pens, paper and other supplies, and to photocopy materials for my
21 classes. I have bought books for use in my English classes from thrift stores,
22 and have received donated books from parents and others in the community.
23 Still, there are many English and literature books that I would like to use with
24 my students that I am not able to use.

25 5. The teachers' ability to photocopy materials for the students' use is
26 also severely limited at Fremont. The limits on photocopying imposed by the
27 school make it nearly impossible to provide substantive materials to our large
28 classes by providing photocopied materials. The photocopy machine located in

1 the library is very old and frequently breaks down. When the machine is
2 working, teachers form long lines in order to make copies for their classes.

3 6. Overcrowding is a severe problem at Fremont High School. The
4 school is operated on a year-round, three-track schedule, where two "tracks" of
5 students and teachers attend school at once, while a third track is off session.
6 Even though Fremont runs year-round in an attempt to accommodate all the
7 students who attend the school, overcrowding still makes it very difficult for
8 the teachers to teach and the students to learn.

9 7. I have been forced to teach severely crowded classes for several
10 years at Fremont. For example, during the 1999-2000 school year, 42 students
11 were enrolled in my 12th grade English class. Five of these students did not
12 have seats. After a few weeks, students stopped coming to class because it was
13 so overcrowded. This year, my ninth grade English class has 26 students,
14 which is unusually small for Fremont. Because this class is not as crowded as
15 most others at Fremont, a student from another class recently asked me if he
16 could sit in on my class. That student told me he needed a place to stay
17 because the chemistry class in which he was enrolled did not have a seat for
18 him.

19 8. Many other classes at Fremont are consistently overcrowded. By
20 my estimate, on average there are 38 students enrolled per class at Fremont.
21 Science and math classes are typically the most crowded, with more than 40
22 students per class. Social studies classes are also almost always very large
23 (between 35 and 40 students). Such severe overcrowding makes it very
24 difficult for the teachers as well as students. For the teachers, workloads
25 becomes unmanageable as class sizes increase, and it becomes very difficult to
26 get to know the students and to meet their individual needs. For the students, it
27 is almost impossible to receive individualized instruction.

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1 9. Overcrowding is not only obvious in the classrooms: During
2 passing periods, the hallways are so crowded that it is very difficult to walk
3 through the halls without bumping into students. The school has erected 20 to
4 30 temporary bungalows on school grounds to accommodate classes. Lines in
5 the cafeteria are so long during lunch period that students spend the majority of
6 their lunch period waiting for their food. Some students choose to stay in my
7 class during lunch time, rather than fight the crowds in the cafeteria.

8 10. The school is so overcrowded that I had to proctor an AP Spanish
9 exam in the auditorium, where approximately 200 students took the test in
10 auditorium seats without desks. The exam had an oral comprehension section
11 that was intended to be administered by playing Spanish on a tape recorder.
12 Unfortunately, we only had a dozen tape recorders for all the students taking
13 the test, so many students were not able to complete this section of the exam. I
14 believe that many students failed the test as a result.

15 11. The special education classrooms at Fremont are created by
16 partitioning large rooms with temporary walls that do not reach to the ceiling,
17 and allow noise from other classes to interfere with instruction taking place in
18 adjacent classrooms. I taught as a substitute in one of these rooms during the
19 1999-2000 school year; it was very difficult to instruct the class while the
20 conversations and noise from other classrooms were almost as loud as the
21 voices in my room.


22 12. The restrooms at Fremont are regularly locked and inaccessible to
23 the students. There are usually only two restrooms accessible to students,
24 which are on the first floor of the three-story main building. The restrooms on
25 the second floor of the main building are routinely locked; the restrooms on the
26 third floor are always locked. There are no restrooms in or around any of the
27 bungalows.

13. Fremont High and its facilities are in a poor, run-down condition. The restrooms that are accessible are in terrible shape. Toilets often back up or do not flush. There is very rarely any toilet paper, and the restrooms are so filthy that they can be smelled from far down the hall.

14. My classroom has several broken desks and chairs; almost all classes in the school have some broken desks. Graffiti is etched into the desks in my classroom. Everything in the school is dirty and dusty. We also have problems with rats, roaches and other insects at Fremont. As a result, no food is allowed in the main building or any of the classrooms.

15. Because the school is in session year-round, when repairs are made, they are often made during class time. This year, a custodian repainted the chalk board in my classroom while my fourth and fifth period classes were in session. The maintenance work taking place at the front of the room was very distracting for the students, and caused the classroom to smell badly. In a past year, the roof of a bungalow in which I was teaching was re-tarred during class time; it smelled so badly that several of my students became ill.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was signed on the __ day of September, 2001, in Los Angeles, California.


Jenna Wiggernhorn