

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF SAN FRANCISCO

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5 ELIEZER WILLIAMS, et al.,) Case No. 312 236
6 Plaintiffs,)
7 vs.) Volume V
8 STATE OF CALIFORNIA; DELAINE) Pages 797 - 832
9 EASTIN, State Superintendent)
10 of Public Instruction; STATE)
11 DEPARTMENT OF EDUCATION;)
12 STATE BOARD OF EDUCATION,)
13 Defendants.)
14)

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16
17 CONTINUED DEPOSITION OF:

18 TRAVIS KIEL

19 TUESDAY, JANUARY 15, 2002

20 9:44 A.M.

21
22
23 Reported by:

24 ALFRED J. LONG

25 CSR No. 2024

1 CONTINUED DEPOSITION OF TRAVIS KIEL,
 2 taken on behalf of the Defendant State of California
 3 at 400 South Hope Street, Fifteenth Floor, Los
 4 Angeles, California, on Tuesday, January 15, 2002, at
 5 9:44 a.m., before ALFRED J. LONG, CSR No. 2024.
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 8 APPEARANCES OF COUNSEL:
 9
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 12 BY: CATHERINE E. LHAMON, ESQ.
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 3 WITNESS EXAMINATION PAGE
 4 TRAVIS KIEL (By Ms. Lhamon) 801
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 8 EXHIBITS
 9
 10 NO. PAGE DESCRIPTION
 11 (None marked.)
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1 APPEARANCES OF COUNSEL (Continued)
 2
 3 FOR CROSS-DEFENDANT AND INTERVENOR LOS ANGELES
 4 UNIFIED SCHOOL DISTRICT:
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1 LOS ANGELES, CALIFORNIA;
 2 TUESDAY, JANUARY 15, 2002; 9:44 A.M.
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 4
 5
 6 TRAVIS KIEL,
 7 having been first duly sworn, was
 8 examined and testified further as follows:
 9
 10 FURTHER EXAMINATION
 11
 12 BY MS. LHAMON:
 13 Q. Good morning, Mr. Kiel.
 14 A. Good morning.
 15 Q. I'm Catherine Lhamon, which I think you
 16 remember. Sorry you had to come today. I would have
 17 preferred to have completed this the last time; I'm
 18 sure you would have as well. The same ground rules
 19 apply as applied in your other days of deposition.
 20 Do you want me to go over those again?
 21 A. Yeah, you can.
 22 Q. Okay. You're testifying today under penalty
 23 of perjury, just the same as if you were testifying
 24 in a courtroom.
 25 Did you understand that?

1 A. Yeah.
 2 Q. I need you to give me complete answers, the
 3 completest answers you can remember, to my questions,
 4 and I'd like for you to use yes or no answers, if you
 5 could, because the court reporter can't take down a
 6 nonverbal answer.
 7 Is that okay?
 8 A. Yes.
 9 Q. Thank you. And if you'll let me finish my
 10 questions, I will also try to let you finish your
 11 answers before starting the next question, so we
 12 don't speak over each other and we have a clean
 13 record.
 14 Is that all right with you?
 15 A. Yes.
 16 Q. I don't want you to guess, but I am entitled
 17 to your best estimate or the best recollection that
 18 you have today about the events that I'll ask you
 19 about.
 20 Is that all right?
 21 A. That's fine.
 22 Q. You understand the distinction between a
 23 guess and an estimate?
 24 A. Yes, I do.
 25 Q. Thank you. Is there any reason that you

1 couldn't give your best testimony today?
 2 A. No.
 3 Q. Thanks. Do you have an understanding as to
 4 why we're back today?
 5 A. I think I do.
 6 Q. Could you tell me what it is?
 7 A. To talk about a meeting that occurred prior
 8 to my original deposition.
 9 Q. Thanks. Your last day of testimony, you
 10 told me that you spoke to Sabrina Strong, from
 11 O'Melveny & Myers, about this case in approximately
 12 May of 2001; is that correct?
 13 A. That's correct.
 14 Q. And is it correct that that meeting took
 15 place at the LAUSD office at 450 South Grand?
 16 A. North Grand.
 17 Q. North Grand, thank you.
 18 And is it correct that the only other person
 19 present at that meeting was Denise Godfrey?
 20 A. That's correct.
 21 Q. Is that the only meeting that you had
 22 between anyone from O'Melveny & Myers and yourself,
 23 other than --
 24 A. That is correct.
 25 Q. Excuse me. -- other than their depositions?

1 A. That's -- I'm sorry. That's correct.
 2 Q. Thank you. Okay. Do you have an
 3 understanding as to what the purpose of that meeting
 4 was?
 5 A. Yes.
 6 Q. Can you tell me what that was?
 7 A. To ask about the case that had been filed
 8 against Los Angeles Unified School District.
 9 Q. Okay. And just so that I understand, was
 10 there a distinction in your mind between the case the
 11 State had filed against the District and the case
 12 that the plaintiffs had filed against the State?
 13 A. I was aware of the case that was filed
 14 against the District. I didn't know any of the
 15 plaintiffs at that time.
 16 Q. Okay, okay. And your understanding at the
 17 time was that the conversation was related
 18 exclusively to issues involved between the State and
 19 the District; is that correct?
 20 A. As far as I -- yes.
 21 Q. Okay. Could you tell me what you discussed
 22 at that meeting?
 23 A. We --
 24 MS. STRONG: Objection, calls for a
 25 narrative.

1 MR. FERNOW: Join.
 2 THE WITNESS: We discussed the case, the --
 3 I don't know the proper terms of it, but it was the
 4 allegations that was brought before the -- of the
 5 lawsuit that was filed against the District, and
 6 everything that I testified to was -- you know, not
 7 everything, but the things that I talked about in
 8 that meeting came out in the deposition.
 9 BY MS. LHAMON:
 10 Q. So it was the general topics that were
 11 covered in the --
 12 A. The general topics.
 13 MR. FERNOW: One at a time. Wait for her to
 14 finish.
 15 THE WITNESS: Okay.
 16 MR. FERNOW: And too, just answer the
 17 question that's asked.
 18 THE WITNESS: Well, I'm trying.
 19 BY MS. LHAMON:
 20 Q. You're doing just fine. And I've been
 21 covering you as well in my questions, which I
 22 promised you I wouldn't do, so I'll try to stop doing
 23 that.
 24 A. Okay.
 25 Q. You said that you discussed the allegations

1 in the lawsuit. Did anyone show you any documents at
2 that meeting?

3 A. Yes.

4 Q. What documents were those?

5 A. Once again, I don't know the title of it,
6 but it was just the information pertaining to the
7 plaintiffs, the two kids who filed this or that was
8 listed in the suit, and all the other allegations
9 pertaining to the case that was brought out and
10 talked about, and the same paperwork that was talked
11 about in the deposition that I gave.

12 Q. Would it help if I showed you a document and
13 asked you if perhaps that was a document that you saw
14 at that meeting?

15 A. Couldn't hurt.

16 MS. LHAMON: Counsel, I only have one copy
17 of that document. Would you mind if I show it to
18 you?

19 MS. STRONG: That's fine. I presume that
20 you're referring to -- well, I don't know.

21 MS. LHAMON: That's an excerpt of the First
22 Amended Complaint.

23 (Whereupon, a document was placed
24 before the witness.)

25 / / / / /

1 allegations at Crenshaw High School?

2 A. Yes.

3 Q. Is that right?

4 A. Uh-huh.

5 Q. Did anyone ask you questions about those
6 allegations?

7 A. Yes.

8 Q. What were the questions, to the best of your
9 memory?

10 MS. STRONG: Objection, calls for a
11 narrative.

12 MR. FERNOW: Join.

13 THE WITNESS: Is it okay to answer?

14 BY MS. LHAMON:

15 Q. Yes.

16 A. The questions were pretty much pertaining
17 directly to the Complaint, and at this current
18 moment, I cannot think of not one thing that I didn't
19 testify to in my deposition that was different from
20 what was talked about in that meeting.

21 Q. I appreciate that. I'm trying to figure out
22 not so much what you know about the conditions of the
23 school right now, but what was discussed at that
24 meeting; so what kinds of things you were asked and
25 what kinds of things you said at that meeting.

1 BY MS. LHAMON:

2 Q. Were you shown a document that looked, in
3 sum or substance, like this one?

4 A. No. Well, it didn't look quite like this.
5 It wasn't typed like this. It was almost double-
6 spaced, and it was full page, but I don't -- let's
7 see. Okay. Yeah, it looked more like this.

8 Q. It looked more like the last page?

9 A. The last two pages, yeah.

10 Q. Okay. And --

11 A. Something more like this, yeah.

12 Q. If you could just take a look at the last
13 page in that excerpt.

14 A. I couldn't see what the other stuff was
15 anyway.

16 Q. It wasn't very exciting.

17 If you wouldn't mind reading the description
18 that follows under the header of "Crenshaw High
19 School."

20 A. This is not Crenshaw High School. This is
21 Susan Miller.

22 Q. Here we go -- oh, you know what? I'm
23 useless.

24 Well, it was a pointless exercise, but you
25 think you saw something that described the

1 I appreciate that we have had a lot of days
2 of deposition, and you've talked to me at length
3 about your perspective about Crenshaw, and I'm not
4 asking you about those questions now. I'm just
5 asking you about what you said at that meeting or
6 what anybody said to you.

7 So to step back, you were shown this
8 document that had allegations about the conditions at
9 Crenshaw High School. Were you asked if you thought
10 that each of those allegations was correct?

11 MS. STRONG: Objection, compound.

12 THE WITNESS: I was asked about the nature
13 of the allegations. They went down the list and
14 asked about those items that were on there.

15 BY MS. LHAMON:

16 Q. Okay. And the questions about the items
17 that were on there, were those questions about
18 whether the items were correct?

19 MS. STRONG: Objection, vague and ambiguous.

20 THE WITNESS: Some of -- some of -- yeah, as
21 far as I can remember, I responded to the allegations
22 the same as I testified in my deposition.

23 BY MS. LHAMON:

24 Q. So you said at that meeting what you knew to
25 be true about those allegations?

1 A. That's correct.
 2 Q. Thank you. I appreciate it.
 3 Did anyone at that meeting ask you whether
 4 Crenshaw High School had any unmet needs?
 5 MS. STRONG: Objection, vague and ambiguous.
 6 THE WITNESS: You know, I can't remember
 7 whether they were asked at that meeting or in the
 8 deposition, so I'm not sure.
 9 BY MS. LHAMON:
 10 Q. Okay. But you do remember being asked about
 11 what needs Crenshaw High School had by someone other
 12 than me?
 13 MS. STRONG: Objection, vague and ambiguous.
 14 THE WITNESS: I don't know. I don't,
 15 really. I really don't know. I know we kind of went
 16 down this list of complaints, and if we got to needs
 17 or not, I can't remember whether we got to needs or
 18 not. I did five, six days of deposition, and it's
 19 kind of running together.
 20 BY MS. LHAMON:
 21 Q. This is just the fifth day now, and I know
 22 it's bad, unless you did a deposition I don't know
 23 about.
 24 A. Maybe there was another case. No, is this
 25 the fourth day?

1 Q. This is the fifth.
 2 A. This is the fifth day, okay.
 3 Q. Well, how about this. Why don't we try it
 4 this way to see if we can talk about it. And I
 5 realize it was a long time ago.
 6 Did you walk into the meeting with your
 7 counsel?
 8 MR. FERNOW: Objection, vague.
 9 THE WITNESS: I don't remember. I know we
 10 went in a room, and I don't know if I walked in with
 11 her, or I was in there and sat down -- yes, I walked
 12 into the room with counsel, yes.
 13 BY MS. LHAMON:
 14 Q. Thank you. And then after you walked into
 15 the room, what happened next?
 16 A. I sat at a big table similar to this.
 17 Sabrina sat across, I sat here, and Denise, the
 18 representative of the District, sat beside me.
 19 Q. And then what happened next after that?
 20 A. I was shown a document, and she went down
 21 this list of questions that she had about the
 22 document, and I talked about them. She asked me
 23 about them, and I responded.
 24 Q. And "she" is Sabrina Strong?
 25 A. Sabrina Strong, that's right.

1 Q. So she, Sabrina Strong, was asking you
 2 questions about that document?
 3 A. Yes.
 4 Q. And that was how the meeting progressed?
 5 A. That's how the meeting progressed.
 6 Q. Then once she completed asking you questions
 7 about that document, did she have any other
 8 questions?
 9 A. At this time, I can't remember how we
 10 finished up. But I do remember going down that list
 11 and asking about the items on the -- the charges on
 12 that list as they pertained to Crenshaw High School
 13 and the students.
 14 MS. LHAMON: Could we go off the record for
 15 a second.
 16 (Discussion off the record.)
 17 (A recess was taken.)
 18 BY MS. LHAMON:
 19 Q. I'm trying to think how you filled the
 20 two-hour meeting -- you testified it was
 21 approximately two hours last time -- with the
 22 allegations about Crenshaw High School, because there
 23 weren't that many allegations in the Complaint or in
 24 the Cross-complaint specific to Crenshaw High School.
 25 So I'm trying to just figure out what took

1 up all those two hours in that meeting. If you could
 2 help me out, I'd appreciate it.
 3 MS. STRONG: Objection, calls -- I mean, no
 4 question pending. And to the extent that you believe
 5 there's a question, it would call for a narrative.
 6 MR. FERNOW: And I'll join.
 7 BY MS. LHAMON:
 8 Q. You can answer.
 9 A. Well, we just started to at the top and went
 10 down, and we talked about textbook issues, we talked
 11 about classes, we talked about bathrooms, we talked
 12 about all of those things that I just -- about
 13 Crenshaw High School, the same things that came out
 14 in the deposition.
 15 I mean, I was amazed just finding out
 16 information about Crenshaw. We talked about class
 17 schedules, we talked about -- so you could do that
 18 very easily. You just got lost in Crenshaw High
 19 School and what was happening. That's pretty much
 20 what took up the two hours. And you know I like to
 21 talk about Crenshaw, so we talked about Crenshaw High
 22 School.
 23 Q. Okay. So just so I understand, the purpose
 24 of the meeting then appeared to you to be to find out
 25 what the state of the school was?

1 A. Yes.
 2 Q. Thank you. Did anyone at that meeting ask
 3 you what you were proud of about Crenshaw High
 4 School?
 5 A. I'm sure I got in -- the answer is I don't
 6 remember, but -- I don't remember.
 7 Q. Okay.
 8 A. Okay.
 9 Q. Are you sure you got to talk about what
 10 you're proud of?
 11 A. I'm sure I said something positive about
 12 Crenshaw.
 13 Q. But you're just not sure if anybody asked?
 14 A. Right.
 15 Q. Okay, thanks. Do you remember if anybody at
 16 that meeting asked you if you had any concerns about
 17 Crenshaw High School?
 18 MS. STRONG: Objection, vague and ambiguous.
 19 MR. FERNOW: Join.
 20 THE WITNESS: I think they had a lot of --
 21 well, I should answer the question.
 22 The concerns were in conjunction with the
 23 Complaint.
 24 BY MS. LHAMON:
 25 Q. So the questions that you were asked about

1 were limited to the questions --
 2 A. That's cor- --
 3 Q. -- that were raised in the complaint?
 4 A. That's correct. I'll wait until you finish.
 5 Q. Thanks, I appreciate it.
 6 Did anyone at that meeting ask you about
 7 your professional background?
 8 MS. STRONG: Objection, vague and ambiguous.
 9 THE WITNESS: You know, I'm not absolutely
 10 sure. I don't remember whether I was asked or not.
 11 BY MS. LHAMON:
 12 Q. Okay. Do you remember if you talked about
 13 your professional background at the meeting?
 14 A. I don't know whether it was at the
 15 deposition or at that meeting. I really -- I'd be
 16 guessing.
 17 Q. Okay. And I appreciate that. I don't want
 18 you to guess. I want you to distinguish in your mind
 19 if you can. At the deposition, I was present, at the
 20 meeting, I wasn't, and I remember that we talked
 21 about your professional background in the deposition,
 22 and I'm just curious if that was a repetition for
 23 you, if you had already talked about your
 24 professional background at the meeting with your
 25 counsel and with Sabrina Strong.

1 MR. FERNOW: Objection --
 2 MS. STRONG: Objection, asked and answered.
 3 MR. FERNOW: -- asked and answered.
 4 THE WITNESS: I really don't remember.
 5 BY MS. LHAMON:
 6 Q. Thank you. Do you remember if anybody at
 7 that meeting asked you about the student population
 8 of Crenshaw High School?
 9 MR. FERNOW: Objection, vague.
 10 MS. STRONG: Join.
 11 THE WITNESS: I remember talking about the
 12 total enrollment. I don't know how it came out, but
 13 I remember talking about the total enrollment at
 14 Crenshaw High School.
 15 BY MS. LHAMON:
 16 Q. What did you say about the total enrollment?
 17 MS. STRONG: Objection, calls for a
 18 narrative.
 19 THE WITNESS: I can't remember what the
 20 total enrollment was at the time, and I don't
 21 remember the exact numbers I gave.
 22 BY MS. LHAMON:
 23 Q. So your memory is that you were giving
 24 information about what the total enrollment was?
 25 A. That's correct.

1 Q. Were you also giving information about how
 2 that enrollment had changed over time?
 3 A. I don't remember.
 4 Q. Were you giving information about the
 5 behavior of students at Crenshaw High School?
 6 MS. STRONG: Objection, vague and ambiguous.
 7 THE WITNESS: I don't remember. I remember
 8 responding to the items of the charges, okay? That I
 9 remember. And to be very honest with you, I don't
 10 remember any things that I didn't testify to asked at
 11 that meeting. It really wasn't a hidden agenda.
 12 BY MS. LHAMON:
 13 Q. Thanks. I appreciate that.
 14 MR. FERNOW: Just answer the question.
 15 THE WITNESS: I'm trying to help her ask her
 16 questions.
 17 BY MS. LHAMON:
 18 Q. No, I appreciate that. I need all the help
 19 I can get. I really appreciate it.
 20 You told me that your understanding of the
 21 purpose of the meeting was to talk about what it was
 22 that was in that document, that list of questions
 23 that you saw.
 24 Did you have an understanding of what was
 25 going to happen as a result of that meeting?

1 MS. STRONG: Objection, vague and ambiguous.
 2 MR. FERNOW: Join.
 3 THE WITNESS: No, not exactly. But I do
 4 know what a lawsuit means.
 5 BY MS. LHAMON:
 6 Q. Okay. Did you have an understanding about
 7 why Sabrina Strong wanted to meet with you to ask you
 8 about the questions that she had that day?
 9 MS. STRONG: Objection, calls for
 10 speculation.
 11 THE WITNESS: I understood why she wanted to
 12 talk to me, yes.
 13 BY MS. LHAMON:
 14 Q. And what was your understanding?
 15 A. That she wanted to find out information
 16 about the allegations that was in the charges.
 17 Q. Did anyone at the meeting ask you to do
 18 anything after the meeting?
 19 MR. FERNOW: Objection, vague and ambiguous.
 20 MS. STRONG: Join.
 21 THE WITNESS: No.
 22 BY MS. LHAMON:
 23 Q. No one at the meeting asked you to conduct
 24 an investigation?
 25 A. No.

1 Q. No one at the meeting asked you to send them
 2 any follow-up documents?
 3 A. Not at that meeting.
 4 Q. That's all I'm asking about. Thank you.
 5 And were you asked to bring any documents to
 6 that meeting?
 7 A. No.
 8 Q. Did you bring any documents to that meeting?
 9 A. No.
 10 Q. Okay, thanks. Did anyone at the meeting ask
 11 you what you do as principal to oversee your school?
 12 MR. FERNOW: Objection, vague and ambiguous.
 13 THE WITNESS: I don't remember.
 14 BY MS. LHAMON:
 15 Q. Do you remember if you discussed what you do
 16 as principal to oversee your school at that meeting?
 17 A. I can't separate the two. I don't remember.
 18 I really don't remember when the question was asked.
 19 Q. You know, my feelings are going to be hurt
 20 in a minute. I wasn't at that meeting, and I was at
 21 the other meetings, so I hope you can separate them.
 22 MS. STRONG: Objection, no question pending.
 23 MR. FERNOW: Don't answer.
 24 BY MS. LHAMON:
 25 Q. I'm just asking you if you can separate in

1 your mind the times that you met with me from the
 2 meetings that you had without me with Sabrina Strong
 3 and Denise Godfrey?
 4 MS. STRONG: Can he separate the two? Is
 5 that the question?
 6 THE WITNESS: I can separate the two
 7 meetings, but the details of what was discussed in
 8 the two with the deposition and in that particular
 9 meeting, I can't separate everything, and when I tell
 10 you I don't know, I don't know.
 11 And I'm not trying to dodge or hide
 12 anything. I just can't separate the two, whether I
 13 was asked about my duties as a principal in the
 14 deposition or whether she asked me about my duties
 15 there. All the questioning was geared towards the
 16 document and as it pertained to the charges in both
 17 the deposition and in the conversation with
 18 Ms. Strong.
 19 BY MS. LHAMON:
 20 Q. Okay, I appreciate that. Thank you for the
 21 clarification.
 22 I'm going to try some specifics.
 23 A. Okay.
 24 Q. Do you remember any discussion at that
 25 meeting about instructional materials?

1 A. Yes.
 2 Q. Can you tell me what you remember about the
 3 discussion about instructional materials?
 4 A. About the purchasing of instruction
 5 materials, how, the process.
 6 Q. And what did you say about that process?
 7 MR. FERNOW: Objection, calls for a
 8 narrative.
 9 MS. STRONG: Join.
 10 THE WITNESS: The same things that I
 11 testified to in the deposition. I kind of outlined
 12 the process for how teachers could get instructional
 13 materials or the process for purchasing, how monies
 14 was allocated to teaching.
 15 BY MS. LHAMON:
 16 Q. And did you discuss whether there were
 17 enough instructional materials for students at
 18 Crenshaw High School?
 19 MS. STRONG: Objection, vague and ambiguous.
 20 THE WITNESS: I can't remember whether we
 21 discussed was there enough instructional materials or
 22 not.
 23 BY MS. LHAMON:
 24 Q. So your memory is that the conversation was
 25 about the process; is that right?

1 A. About the process and about the allegations.
 2 Q. Okay, thank you. Do you remember discussing
 3 classroom crowding at Crenshaw High School at that
 4 meeting?
 5 A. I'm not -- I can't -- no, I don't.
 6 Q. Thank you. Do you remember discussing
 7 whether students have seats in class at Crenshaw High
 8 School at that meeting?
 9 A. Yes.
 10 Q. And what did you say about that?
 11 MR. FERNOW: Objection, narrative.
 12 MS. STRONG: Join.
 13 THE WITNESS: I stated the process of
 14 providing furniture for students; if a teacher didn't
 15 have enough seats, what was the process; and that if
 16 teachers requested chairs, they would get them, and
 17 the process; and we went through the steps about how
 18 you would get additional seating for your classroom.
 19 BY MS. LHAMON:
 20 Q. Thank you. Did Ms. Strong say anything back
 21 to you after you said that?
 22 MS. STRONG: Objection, vague and ambiguous.
 23 THE WITNESS: I can't remember.
 24 BY MS. LHAMON:
 25 Q. Okay. Do you remember if Ms. Godfrey said

1 A. Yes.
 2 Q. Can you tell me what you discussed?
 3 MS. STRONG: Objection, calls for a
 4 narrative.
 5 MR. FERNOW: Join.
 6 THE WITNESS: I was asked about rats at
 7 Crenshaw, and I explained that I had never seen any
 8 rats at Crenshaw. We talked about water bugs and the
 9 difference between roaches and water bugs. We came
 10 to a definition of roaches versus water bugs.
 11 BY MS. LHAMON:
 12 Q. Sounds like fun.
 13 A. Yeah.
 14 Q. And it also sounds like you remember some
 15 follow-up questions in the conversation about the
 16 difference between a roach and a water bug; is that
 17 right?
 18 A. Yes. I just remember my explanation of it.
 19 Q. And you don't remember any follow-up
 20 questions?
 21 A. And had I seen water bugs, and I said yes.
 22 Q. Okay. And is that the sum total of that
 23 part of the conversation?
 24 A. That's all I can remember.
 25 Q. Thank you. And I appreciate the

1 anything back to you?
 2 A. No.
 3 Q. Okay, thanks. Do you remember discussing
 4 teacher credentials at Crenshaw High School at that
 5 meeting?
 6 A. No.
 7 Q. Do you remember discussing teacher turnover
 8 at Crenshaw High School at that meeting?
 9 A. No.
 10 Q. Do you remember discussing substitute
 11 teachers at Crenshaw High School at that meeting?
 12 A. I think we talked about the process for the
 13 substitutes, the process for assigning subs.
 14 Q. So it was similar to the process for
 15 obtaining instructional materials, the discussion?
 16 A. Yes.
 17 Q. Thanks. Do you remember anybody saying
 18 anything back to you after you described the process?
 19 A. No.
 20 Q. Do you remember anybody asking you any
 21 clarifying questions?
 22 A. No.
 23 Q. Do you remember discussing vermin, such as
 24 rats, mice or roaches, or, let's say, water bugs, at
 25 that meeting?

1 clarification, too.
 2 Do you remember discussing any facilities
 3 problems at Crenshaw High School at that meeting?
 4 MS. STRONG: Objection, vague and ambiguous.
 5 THE WITNESS: I think we discussed the
 6 bungalows, the lack of classroom space and they need
 7 bungalows.
 8 BY MS. LHAMON:
 9 Q. And what do you remember saying about those
 10 things?
 11 A. That we were getting additional classroom
 12 space. That was in the process of being done at the
 13 time.
 14 Q. And that was something that you said or that
 15 someone said to you?
 16 A. Well, I said that we were getting the
 17 spaces. And I don't remember how the question was
 18 phrased, but I do remember discussing classroom
 19 housing and the bungalows.
 20 Q. Did your counsel confirm that for you, that
 21 you were going to get the new bungalows on campus at
 22 that meeting?
 23 A. No.
 24 Q. Did Ms. Strong confirm that for you at that
 25 meeting?

1 A. No.

2 Q. Okay, thanks. Do you remember discussing
3 whether bathrooms are locked on Crenshaw High School
4 campus at that meeting?

5 A. No.

6 Q. Do you remember discussing toilet paper for
7 bathrooms at Crenshaw High School at that meeting?

8 A. No.

9 Q. Do you remember discussing whether any
10 students were charged fees at Crenshaw High School at
11 that meeting?

12 A. No, I can't remember whether we talked about
13 student fees at that meeting or not.

14 Q. Okay, I appreciate that.

15 Did anyone at that meeting discuss with you
16 what they thought would happen with the lawsuit at
17 that meeting?

18 MS. STRONG: Objection, vague and ambiguous.

19 MR. FERNOW: Join.

20 THE WITNESS: No, I don't remember
21 discussing what would happen to the lawsuit at that
22 meeting.

23 BY MS. LHAMON:

24 Q. And no one talked to you about the
25 possibility of settling the lawsuit at that meeting?

1 the theory of the lawsuit?

2 MR. FERNOW: Objection, vague and ambiguous.

3 MS. STRONG: Objection, vague and ambiguous.

4 THE WITNESS: No. When you say "the
5 theory," I don't...

6 BY MS. LHAMON:

7 Q. You don't know what I mean by that?

8 A. Well, I know what theory is, but I don't
9 know how it pertained to that question.

10 Q. Okay. I really appreciate your telling me
11 that. I'm asking if anybody talked to you about why
12 they thought the plaintiffs had brought the suit
13 against the State or what the purpose would be of the
14 lawsuit?

15 MR. FERNOW: Objection, compound.

16 THE WITNESS: No.

17 BY MS. LHAMON:

18 Q. Do you want me to break that question down?

19 A. No, that's all right.

20 Q. Neither one came up?

21 A. Yeah, neither one came up.

22 Q. Okay. Did anyone tell you at that meeting
23 what you could expect as the lawsuit progressed?

24 MS. STRONG: Objection, vague and ambiguous.

25 MR. FERNOW: Join.

1 A. No.

2 Q. Did the topic of settlement come up at that
3 meeting?

4 A. No.

5 Q. No one asked you to investigate conditions
6 at your school at that meeting?

7 A. No.

8 MS. STRONG: Objection, asked and answered.

9 MR. FERNOW: Join.

10 THE WITNESS: No.

11 BY MS. LHAMON:

12 Q. Did anyone at that meeting talk about the
13 fact that the State had sued the School District?

14 MS. STRONG: Objection.

15 THE WITNESS: I don't remem- -- no, I don't
16 remember that.

17 MS. STRONG: Also assumes facts.

18 BY MS. LHAMON:

19 Q. And no one at the meeting told you why the
20 State had sued the School District?

21 MS. STRONG: Objection, lacks foundation.

22 MR. FERNOW: Join.

23 THE WITNESS: No.

24 BY MS. LHAMON:

25 Q. No one talked to you at that meeting about

1 THE WITNESS: I don't remember anyone
2 spelling anything out as to what would happen after
3 that.

4 BY MS. LHAMON:

5 Q. Did you have any understanding at the time
6 about what would happen after that?

7 A. No, I didn't. I hoped that they were done
8 with me at that time.

9 Q. I understand that. Had you done anything to
10 prepare for that meeting before it took place?

11 A. No.

12 Q. You hadn't conducted any investigation?

13 A. No, none.

14 Q. Did anyone at the meeting ask you to help
15 the Los Angeles Unified School District in connection
16 with the State's suit against the District?

17 MR. FERNOW: Objection, vague and ambiguous.

18 THE WITNESS: No.

19 BY MS. LHAMON:

20 Q. Did anyone at the meeting ask you to do
21 anything to help the Los Angeles Unified School
22 District in connection with the lawsuit against the
23 State?

24 MR. FERNOW: Objection, vague and ambiguous.

25 THE WITNESS: No.

1 MS. LHAMON: That's all I have. I
 2 appreciate your coming today.
 3 Do you have any questions?
 4 MS. STRONG: No.
 5 MR. FERNOW: No.
 6 MS. LHAMON: Thanks a lot.
 7 MR. FERNOW: Same stipulation as whatever
 8 the current stipulation is?
 9 MS. STRONG: Whatever she wants to do.
 10 MS. LHAMON: I don't feel I need to have a
 11 stipulation, but if you'd like one...
 12 MR. FERNOW: I don't know what -- I just --
 13 you know, I'm not in on every deposition, so I didn't
 14 know what the latest...
 15 MS. STRONG: We can do same stipulation,
 16 30 days.
 17 MS. LHAMON: If you like.
 18 MR. FERNOW: That's fine.
 19 (At the hour of 10:20 a.m. the
 20 deposition was adjourned.)
 21
 22
 23
 24
 25

1 CERTIFICATE
 2
 3 I, ALFRED J. LONG, Certified Shorthand
 4 Reporter No. 2024 in and for the State of California,
 5 do hereby certify:
 6 That prior to being examined, the witness
 7 named in the foregoing deposition was by me duly
 8 sworn to testify as to the truth, the whole truth and
 9 nothing but the truth;
 10 That said deposition was taken before me at
 11 the time and place therein set forth and was taken
 12 down by me stenographically and thereafter
 13 transcribed via computer-aided transcription under my
 14 direction;
 15 I further certify that I am neither counsel
 16 for, nor related to, any party to said action, nor
 17 interested in the outcome thereof.
 18 IN WITNESS WHEREOF, I have hereunto
 19 subscribed my name this 28th day of January 2002.
 20
 21
 22
 23
 24 ALFRED J. LONG, CSR No. 2024
 25

1 DECLARATION
 2
 3 I hereby declare I am the deponent in
 4 the within matter; that I have read the foregoing
 5 deposition and know the contents thereof, and I
 6 declare that the same is true of my knowledge
 7 except as to the matters which are therein stated
 8 upon my information or belief, and as to those
 9 matters, I believe it to be true.
 10 I declare under the penalties of
 11 perjury of the State of California that the foregoing
 12 is true and correct.
 13 Executed this day of ,
 14 2002, at , California.
 15
 16
 17
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 19
 20 WITNESS
 21
 22
 23
 24
 25