

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

ELIEZER WILLIAMS, et al.,)

Plaintiffs,)

vs.)

No. 312236

STATE OF CALIFORNIA, DEALINE)

EASTIN, State Superintendent)

of Public Instruction, STATE)

DEPARTMENT OF EDUCATION,)

STATE BOARD OF EDUCATION,)

Defendants.)

DEPOSITION OF D'ANDRE DEVON LAMPKIN
Los Angeles, California
Sunday, May 20, 2001
Volume

Reported by:
JACQUIE NEMOR
CSR No. 4834
JOB No. 847678

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 2 FOR THE COUNTY OF SAN FRANCISCO
 3
 4 ELIEZER WILLIAMS, et al.,)
 5)
 6 Plaintiffs,)
 7)
 8 vs.) No. 312236
 9)
 10 STATE OF CALIFORNIA, DEALINE)
 EASTIN, State Superintendent)
 11 of Public Instruction, STATE)
 DEPARTMENT OF EDUCATION,)
 12 STATE BOARD OF EDUCATION,)
 13)
 14 Defendants.)

15 Deposition of D'ANDRE DeVON LAMPKIN,
 16 Volume 1, taken on behalf of Defendant
 17 State of California, at 400 South Hope
 18 Street, Los Angeles, California,
 19 beginning at 9:36 a.m. and ending at
 20 4:29 p.m. on Sunday, May 20, 2001,
 21 before JACQUIE NEMOR, Certified Shorthand
 22 Reporter No. 4834.
 23
 24
 25

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 3 D'ANDRE DeVON LAMPKIN
 Volume 1

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 10 Plaintiff D'Andre Lampkin and
 Request for Production of Documents;
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1 APPEARANCES:
 2
 3 For Plaintiffs:
 4 ACLU FOUNDATION OF SOUTHERN CALIFORNIA
 BY: CATHERINE E. LHAMON
 5 BY: PETER ELIASBERG
 Attorneys at Law
 6 1616 Beverly Boulevard
 Los Angeles, California 90026-5752
 7 (213) 977-9500
 8
 9 For Defendant State of California:
 10 O'MELVENY & MYERS LLP
 BY: JENNIFER VANSE
 Attorney at Law
 11 400 South Hope Street
 Los Angeles, California 90071-2899
 12 (213) 430-6000
 13 O'MELVENY & MYERS LLP
 Embarcadero Center West
 14 275 Battery Street
 San Francisco, California 94111-3305
 15 (415) 984-8700
 (No appearance.)
 16
 17 For Defendant Los Angeles Unified School District:
 18 LOZANO SMITH
 BY: JAMES B. FERNOW
 Attorney at Law
 19 2800 28th Street, Suite 240
 Santa Monica, California 90405-2934
 20 (310) 382-5300
 21
 22 Also Present:
 23 ROSALYN LAMPKIN
 24
 25

1 Los Angeles, California, Sunday, May 20, 2001
 2 9:36 a.m. - 4:29 p.m.
 3

4 D'ANDRE DeVON LAMPKIN,
 5 having been first duly sworn, was examined and testified
 6 as follows:
 7

EXAMINATION

9 BY MS. VANSE:

10 Q Good morning, D'Andre. My name is Jennifer
 11 Vanse and I'm an attorney representing the State of
 12 California in this litigation.

13 Would you please state your full name and the
 14 city you live in for the record.

15 A My name is D'Andre DeVon Lampkin, and I live in
 16 the City of Los Angeles.

17 D apostrophe capital A-n-d-r-e. Last name
 18 L-a-m-p-k-i-n.

19 MS. LHAMON: You should spell your middle name,
 20 too.

21 THE WITNESS: My middle name is capital D-e
 22 apostrophe capital V-o-n.

23 MS. LAMPKIN: No apostrophe. It's capital "D"
 24 small "e" capital V-o-n. You can't change it.

25 THE WITNESS: Yeah. It's spelled different in

1 French and all kind of languages.

2 BY MS. VANSE:

3 Q Have you ever been deposed before?

4 A No.

5 Q I'm just going to briefly explain what a
6 deposition is. Today I'm going to ask you a series of
7 questions to determine the facts that you know that
8 relate to your lawsuit. And our reporter here is going
9 to be recording my questions and your answers and any
10 objections that your counsel may make and it's going to
11 be transcribed into a booklet that you will be able to
12 review.

13 A Okay.

14 Q When you review the booklet if you think you
15 need to make any changes you can feel free to make those
16 changes, but the various lawyers will be able to comment
17 on any changes that you make. Do you understand that?

18 A Yes.

19 Q So it's very important that you respond to
20 these questions as fully and thoroughly as you possibly
21 can. Do you understand that?

22 A Yes.

23 Q When you answer my questions, it's important
24 that you answer "Yes" or "No" and not shake your head or
25 say "Huh-huh" or "Uh-uh" so that the reporter can

1 were testifying in a court of law, so even though this
2 might seem like an informal setting, the penalties of
3 perjury that would apply in a court of law do apply here
4 as well. Do you understand that?

5 A Yes.

6 Q If you need a break for any reason, please let
7 me know and I will try and accommodate you. I do ask
8 that if I've asked you a question you answer that first
9 before asking for a break and at that point we can
10 instruct the court reporter to go off the record at any
11 time. Do you understand that?

12 A Yes.

13 Q Do you feel comfortable asking me for a break?

14 A Yes.

15 Q If at any point during today's deposition a
16 question I ask or an answer that you give triggers
17 something that you may have answered previously and you
18 want to add something to what you said earlier, please
19 let me know that information and we will get it on the
20 record then. If not, we will assume that the answers
21 that you give today are full and complete. Do you
22 understand that?

23 A Yes.

24 Q Do you understand these ground rules?

25 A Yes.

1 understand what is being said. Do you understand that?

2 A Yes.

3 Q It is also important to get a clear record, so
4 that if I'm asking a question, you wait until I finish,
5 and I will do the same for you when you are answering a
6 question, I'll wait until you finish. Do you understand
7 that?

8 A Yes.

9 Q It's important that you do listen carefully and
10 that you understand the questions that I'm asking you.
11 If you don't hear a question or you don't understand it,
12 let me know and I'll try to rephrase it if that's what
13 you need or I'll ask you what you don't understand and
14 try to help you out. If you don't tell me that you
15 don't understand, I will presume that you heard and
16 understood what I've asked you. Do you understand that?

17 A Yes.

18 Q You are required to answer my questions to the
19 best of your ability. If you don't know an answer, that
20 is perfectly okay and we don't want you to guess, but we
21 are entitled to your best recollection when you can
22 provide one. Do you understand that?

23 A Yes.

24 Q Because your testimony will be given under
25 oath, it will have the same force and effect as if you

1 Q Do you have any questions?

2 A No.

3 Q Is there any reason why you might be unable to
4 testify and give your best testimony today?

5 A No.

6 Q Have you recently consumed any medication,
7 alcohol, any substance that might cloud your mind?

8 A No.

9 Q Have you taken any drugs or medication?

10 A No.

11 Q Do you suffer from a disability of any kind
12 that would affect your ability to answer or understand
13 any of my questions?

14 A No.

15 Q Now I'm going to ask you some questions about
16 how you prepared for today. Did you prepare for this
17 deposition?

18 A Yes.

19 Q What did you do?

20 A Well, I just talked with my attorney here and
21 we had a meeting and discussed --

22 MS. LHAMON: I instruct you not to talk about
23 what we talked about. You can say you met with me, but
24 you can't say what we talked about.

25 THE WITNESS: I met with my attorney. That's

1 about it.
 2 BY MS. VANSE:
 3 Q How many times did you meet with your attorney?
 4 A I met with my attorney twice.
 5 Q Did you only speak with one attorney?
 6 A Yes.
 7 Q When was the first time?
 8 MS. LHAMON: Are we still talking about in
 9 preparation for this deposition?
 10 MS. VANSE: Yes.
 11 Q In preparing for your deposition when was the
 12 first time that you spoke with your attorney?
 13 A The first time I spoke with my attorney was
 14 back in, I think, December.
 15 Q Maybe you didn't understand. I'm just asking
 16 about how you prepared for today's deposition.
 17 A The last time I spoke with my attorney was
 18 Monday.
 19 Q And that was the only time you spoke with your
 20 attorney regarding today's deposition?
 21 A Let me correct that. It was Tuesday. Tuesday
 22 afternoon.
 23 Yes.
 24 Q Do you remember how long it was, your meeting?
 25 A It was about four hours.

1 Q Was this in person or on the phone?
 2 A It was in person.
 3 Q Any other meeting with your attorney or
 4 contact, e-mails or letters, preparing for today's
 5 deposition?
 6 A I received letters over a certain time period.
 7 It was since about December. I talked with my attorney
 8 during the same time.
 9 Q Was that in preparing for your deposition?
 10 A Yes.
 11 MS. LHAMON: D'Andre, do you understand that
 12 the deposition is what is taking place today and only
 13 what is taking place today?
 14 THE WITNESS: Yes.
 15 BY MS. VANSE:
 16 Q About how many letters have you received
 17 preparing for the deposition?
 18 A I received approximately five; five letters.
 19 Q Did they have any documents attached other than
 20 the letter?
 21 A Only about I think it was only one time when it
 22 actually came with the document.
 23 Q So you received five letters and one of those
 24 letters had other documents attached?
 25 A Yes.

1 MS. LHAMON: Could we take a break for a
 2 minute, Counsel?
 3 MS. VANSE: Sure.
 4 (Attorney-client discussion.)
 5 MS. LHAMON: D'Andre has a few things he just
 6 wanted to clarify.
 7 THE WITNESS: I want to clarify that I met with
 8 Catherine for preparation for this deposition. I had a
 9 meeting with her once and she called twice. The phone
 10 conversations were twice.
 11 MS. VANSE:
 12 Q That was the meeting on Tuesday?
 13 A Yes.
 14 Q That lasted about four hours?
 15 A (No audible response.)
 16 MS. LHAMON: You have to say "Yes" or "No."
 17 THE WITNESS: Yes.
 18 BY MS. VANSE:
 19 Q Other than that meeting and those phone calls,
 20 have you talked with an attorney preparing for this
 21 deposition at all?
 22 A Can you clarify?
 23 Q Sure. Other than the meeting with Catherine
 24 and those two phone calls, any other contact with any of
 25 your attorneys to prepare for this deposition?

1 A Not in preparation for the deposition.
 2 Q Other than contact with your attorneys have you
 3 spoken with anyone else about your deposition today?
 4 A No.
 5 Q Did you talk to your brother or your mom?
 6 A Yes.
 7 Q What did you guys talk about?
 8 A I cannot discuss that with you.
 9 MS. LHAMON: You actually can answer. If it is
 10 your brother and your mom, you can. But thanks.
 11 THE WITNESS: We just discussed what Catherine
 12 and I talked about.
 13 BY MS. VANSE:
 14 Q This is with both your brother and your mother?
 15 A Both with my brother and my mother.
 16 Q How many conversations did you have with your
 17 brother about preparing for your deposition today?
 18 A I talked to him maybe about three times because
 19 we didn't talk about it often.
 20 Q How about with your mom?
 21 A With my mom about the same.
 22 Q Three times?
 23 A Yes.
 24 Q Did you review any documents to prepare for
 25 your deposition today?

1 A No. Other than -- well, yes. I looked at my
 2 declaration.
 3 Q Was this your first declaration or your second
 4 declaration?
 5 A My first and my second declaration.
 6 Q What did you review them for?
 7 A I just wanted to review them because I hadn't
 8 seen them in a while and that's the reason why I
 9 reviewed them.
 10 Q When you reviewed your declarations, did you
 11 think anything had changed from when you signed them?
 12 A No.
 13 Q Other than your declaration, did you read any
 14 documents to prepare for your deposition?
 15 A I read a few letters that were sent to me.
 16 Q Were these letters from your attorneys?
 17 A Yes.
 18 Q Anything else that you reviewed?
 19 A No.
 20 Q How about at your school, did you look over --
 21 go into anything at your school, look at the classrooms,
 22 talk to any teachers?
 23 A I just recently transferred schools back in
 24 March. So I haven't had an opportunity to go back to my
 25 other school and look at anything else.

1 Q What school did you transfer to?
 2 A I transferred to Washington High School.
 3 MS. VANSE: D'Andre, I'm going to mark this as
 4 Exhibit 1 and I'm going to show you what is labeled as
 5 your notice of deposition in this case.
 6 THE WITNESS: When you say you are going to
 7 mark it as Exhibit 1, what do you mean you are marking
 8 it?
 9 MS. VANSE: I'm marking it at the deposition
 10 and it will be attached to the transcript here just so
 11 we know what it is in the deposition and then when you
 12 refer to it we can just have it as an exhibit.
 13 (Defendant's Exhibit 1 marked for
 14 identification by the court reporter.)
 15 BY MS. VANSE:
 16 Q Have you seen it before, that document?
 17 A No, I have not seen this document.
 18 Q Could you look at page 7 for me.
 19 A Okay.
 20 Q Your attorney gave me some of your grades and
 21 your test scores. Other than what she has already given
 22 me, do you have any documents that might fit into what
 23 has been asked for here in this, on page 7, this
 24 description?
 25 A On page 7?

1 Q Do you have any documents that are described
 2 there?
 3 A Such as the language training records and the
 4 forms and study interactions?
 5 Q Anything that you might have.
 6 A No. When you asked me --
 7 MS. VANSE: Just a second.
 8 (Discussion off the record from
 9 9:57 a.m. to 10:01 a.m.)
 10 (Mr. Fernow entered the proceedings.)
 11 MR. FERNOW: We were not aware that the
 12 deposition started at 9:30. The fact is that we
 13 understood that the deposition started at 10:00 o'clock.
 14 And had we known that the deposition started at 9:30 we
 15 would have been here on time.
 16 BY MS. VANSE:
 17 Q I was asking you about page 7 of the document.
 18 A My question about that -- your question was --
 19 can you ask your question again to clarify the question?
 20 Q Yes, I can. After you looked over what was
 21 requested here, I asked you if you had any documents
 22 other than what your attorneys have already given me,
 23 which is your grades and your test scores, that fit into
 24 the description of the documents described on page 7.
 25 A Do you mean do I have any of those documents

1 readily available to give to you now or do I have them
 2 at home or --
 3 Q Either one. How about at home?
 4 A Let's see. I do have some of these records at
 5 home such as -- let's see. I do have on file my grades
 6 and credits towards graduation. And those are located
 7 within my school. And my progress reports, which are
 8 located on my transcripts, are at school also. My
 9 standardized testing scores are in school. [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 And that's it.
 16 BY MS. VANSE:
 17 Q Those are all documents you have at your home?
 18 A No. Those are located at my school.
 19 Q What do you have at your home, if anything?
 20 A I don't think I have any of these records at
 21 home.
 22 MS. LHAMON: Other than what we've produced
 23 today.
 24 THE WITNESS: Yes.
 25 BY MS. VANSE:

1 Q Other than what are specifically listed, do you
2 have any documents at home or at school which generally
3 relate to your education that you received either at
4 Crenshaw or at Washington, any school that you've
5 attended?

6 MS. LHAMON: I'm going to object that is vague
7 as to time and it doesn't represent what is included in
8 this request.

9 So you should answer it specifically to this
10 request only to the extent that you understand the
11 request. If you don't understand it, you can say that.

12 THE WITNESS: I'm going to go ahead and answer
13 just strictly what is located in this form here. Other
14 than the -- well, the documents that are listed here I
15 just gave those to you. I just told you which ones I do
16 have in school.

17 BY MS. VANSE:

18 Q Do you see at the top of the request where it
19 says -- it asks for any and all documents which refer,
20 pertain, or relate to your education in any and all
21 California public schools?

22 A I don't know if I gave one document to my
23 attorney here, but it was a letter from Gray Davis.

24 MS. LHAMON: I'm going to instruct you not to
25 talk about what you've given me. I'm also going to

1 A I lived over there -- over at my current
2 address for approximately eight years.

3 Q Who else lives there with you?

4 A My mother and my brother, my twin, lives where
5 I live.

6 Q Anyone else?

7 A No.

8 Q You said you go to Washington High School now?

9 A Yes.

10 Q Is that the closest high school to where you
11 live?

12 A Yes.

13 Q How far away is Crenshaw?

14 A In mileage? In distance, based on miles, it's,
15 oh, man --

16 MS. LHAMON: Just tell her what you know.

17 THE WITNESS: I'm not sure what the distance is
18 in miles. It's not close. It's not far either. It's
19 not far either, but I can give you a general location.
20 It's in the Baldwin Hills area.

21 BY MS. VANSE:

22 Q Just approximate. You don't have to give me
23 exact miles, just a general, like if you were going to
24 school on a morning how long would it take you to get
25 there?

1 object to this line of questioning. We have a
2 protective order that describes what is and is not
3 available at the deposition. We have produced the
4 documents that are in D'Andre's possession for the
5 deposition. He doesn't have anything else that is
6 within the scope of the protective order.

7 BY MS. VANSE:

8 Q Do you have any other documents?

9 MS. LHAMON: D'Andre doesn't know what is
10 within the scope of the protective order because he is
11 not a lawyer. I will represent to you and I am willing
12 to stipulate on the record that we have produced
13 everything that is responsive within the scope of this
14 protective order.

15 MS. VANSE: Having not seen the protective
16 order, I may come back to this, but I will accept that
17 for now and we can go on.

18 MS. LHAMON: Thank you.

19 BY MS. VANSE:

20 Q D'Andre, are you still -- are you 16?

21 A Yes.

22 Q You are still in 10th grade?

23 A Yes.

24 Q How long have you lived at your current home
25 address?

1 A It took me approximately 45 minutes on the
2 school bus, but that is only because we have to pick up
3 other stops -- other kids at other stops. So straight
4 to school I wouldn't know how long it would take.

5 Q Did you start high school at Crenshaw?

6 A Yes.

7 Q Why did you go to Crenshaw instead of
8 Washington when you started high school?

9 A Well, previously I went to Audubon Middle
10 School. And when I went there Crenshaw High School is
11 located right in the same area so they -- when I was in
12 Audubon, when I was ready to go to high school, they
13 just transferred my records and that is the school I
14 went to because my records were already there and I was
15 enrolled as a Crenshaw High School student.

16 Q Why did you transfer to Washington in March?

17 MS. LHAMON: I'm going to instruct you not to
18 answer that question because it's within the scope of
19 the protective order.

20 MS. VANSE: I'm going to go off the record for
21 a second. I'm going to go take a break.

22 (Recess from 10:09 a.m. to 10:13 a.m.)

23 BY MS. VANSE:

24 Q We were talking about you transferring to
25 Washington in March.

1 A Yes.
 2 Q I'm going to just ask you again. Why did you
 3 transfer?
 4 MS. LHAMON: I'm going to instruct you not to
 5 answer that question because the answer would fall
 6 within the scope of the protective order.
 7 MS. VANSE: I guess I'm going to respond to
 8 that by saying, number one, I haven't seen a protective
 9 order and I'm not even aware that there is one in place.
 10 Second, I believe that the reason -- the transfer and
 11 reasons for it are not within a protective order.
 12 To the extent you want to keep anything
 13 confidential or limited to this litigation, that is
 14 fine, but I haven't heard you explain exactly why you
 15 think that is confidential. And if you want to go ahead
 16 and make your record, that is fine, but I think that is
 17 related and pertinent to the information that we are
 18 seeking and entitled to seek. So if you need to make a
 19 record go ahead, but I don't agree with that.
 20 MS. LHAMON: I appreciate your statements. I
 21 am still instructing him not to answer.
 22 I know why D'Andre transferred and I know that
 23 it falls within the scope of some material that the
 24 judge expressly excluded from this litigation at the
 25 hearing we had, so I'm going to instruct D'Andre not to

1 answer.
 2 MS. VANSE: I still haven't heard why you think
 3 that is private and protected and we can take that up at
 4 a later time and I will agree at this time to let it go,
 5 but I do think it is related and not within the scope of
 6 that.
 7 Q Have you ever lived anywhere else other than
 8 Los Angeles?
 9 A No.
 10 Q Do you study and do your homework at your
 11 house?
 12 A Yes.
 13 Q Where? In your room?
 14 A In my room.
 15 Q About how often do you study at home?
 16 A Depends on what the assignment is or the
 17 difficulty in -- what difficulty in what classes. I
 18 study anywhere around two to three hours. Like I said,
 19 it depends on what assignments I need to do or how much
 20 I need to study.
 21 Q Is it two or three hours every day?
 22 A Yes.
 23 Q And about how many days a week do you think you
 24 study?
 25 A Maybe about four.

1 Q Do you have your own study space outside of --
 2 a little space that you like to call your study space
 3 that is private that you can just go to?
 4 A Yes. In my living room I have my computer -- I
 5 have my computer workstation there. That's where I do
 6 my study or research on my computer.
 7 Q At Crenshaw how did you get to and from school?
 8 The bus?
 9 A Yes, the school bus.
 10 Q Did you ever drive?
 11 A No.
 12 Q Anyone ever drive you?
 13 A Yes. Maybe about two -- it wasn't a lot.
 14 Maybe every now and then whenever my mom was off work
 15 she would take me to school.
 16 Q So how long were you a student at Crenshaw?
 17 A I was a student at Crenshaw up until my -- up
 18 until the end of the first semester of my 10th grade
 19 year.
 20 Q I know you said this before, but where did you
 21 go to school before?
 22 A I went to Audubon Middle School.
 23 Q What about before then?
 24 A I went to Woodcrest Elementary.
 25 Q You went there for your entire elementary?

1 A No. Before I went to Woodcrest Elementary I
 2 went to Raymond Avenue Elementary.
 3 Q Anywhere else?
 4 A No.
 5 Q Did you have any special programs at a
 6 different school or maybe a college or junior college?
 7 A Can you clarify that question?
 8 Q At any time, in high school, junior high, did
 9 you ever go to another school, whether it was just for a
 10 little bit, a special program other than the ones you
 11 just talked about?
 12 A Currently or previously?
 13 Q In elementary school, other than the ones
 14 you've already told me about, did you go anywhere else
 15 for your elementary school years?
 16 A No.
 17 Q How about junior high?
 18 A No.
 19 Q No special summer programs somewhere else or --
 20 A Summer programs I went to -- I did voluntary
 21 services at the Woodcrest Library. It was like a
 22 program set up for students who like to work in the
 23 library.
 24 Q And in high school?
 25 A High school I attend the Community Coalition.

1 I've been an Explorer for the Los Angeles County
2 Sheriff's Department. And currently I attend Southwest
3 receiving college credits for being a drill instructor.

4 Q Other than that, any other schools that you've
5 attended?

6 A No.

7 Q Has there ever been a time when you were not
8 able to attend school when it was in session?

9 A No.

10 Q And this is for elementary, junior high, and
11 high school?

12 A Yes.

13 Q Have you ever had a job?

14 A Currently I work for the Community Coalition
15 under a stipend program.

16 Q Anything else?

17 A No.

18 Q During the summer, no jobs?

19 A No.

20 Q Do you play sports?

21 A No.

22 Q What else do you do besides school and the
23 things you've already told me about, any other volunteer
24 activities?

25 A Volunteer activities other than the ones I

1 Q Can you describe for me what "facilitate
2 meetings" means?

3 A Just to organize meetings, put together a plan
4 for the meeting, what we are going to talk about, and
5 just be the lead speaker of the meeting and coordinate
6 the meeting. And that's it.

7 Q Who else attends the meetings?

8 A Other students within the school. Can you
9 clarify the question for me?

10 Q Sure. Other students. Are there other
11 facilitators?

12 A Sometimes there are two other facilitators work
13 with me, one other facilitator works with me, or
14 sometimes just me by myself. And other students attend
15 the meetings and teachers attend the meetings.

16 Q And what are you guys trying to do in the
17 meetings?

18 A All we try to do is discuss problems that we
19 have in the school and find different solutions for the
20 problems.

21 Q Can you tell me some of the problems?

22 MS. LHAMON: I'm going to instruct you not to
23 talk about any disciplinary-related problems that people
24 might discuss at those meetings and only talk about
25 other problems.

1 explained, nothing.

2 Q No other groups or anything like that that you
3 belong to?

4 A No.

5 Q Why don't you tell me about this Community
6 Coalition.

7 A In the Community Coalition I participate in a
8 group called SCYEA. It stands for South Central Youth
9 Empowered through Action.

10 MS. LHAMON: How is SCYEA spelled, for the
11 court reporter?

12 THE WITNESS: SCYEA is spelled S-C-Y-E-A.

13 BY MS. VANSE:

14 Q What is that?

15 A Well, I facilitate meetings. And during school
16 I meet with other students within my school and we have
17 meetings and talk about different things that is going
18 on in the school such as problems that the students
19 have, something like that.

20 Q What schools do you work with?

21 A So far when I was at Crenshaw I facilitate
22 meetings within Crenshaw. Now that I've transferred to
23 Washington, I facilitate meetings in Washington and
24 during the summer I facilitate meetings at Manual Arts,
25 Fremont, and Washington before I transferred there.

1 THE WITNESS: Can you clarify the question?

2 BY MS. VANSE:

3 Q Sure. What problems do you talk about?

4 A That we talk about?

5 Q Or try and help with.

6 A Different problems such as when students are
7 having trouble in school with other students, if they
8 are having trouble with teachers in school, and if they
9 are having troubles with the conditions in the school.
10 That's it.

11 Q About how many people attend the meetings?

12 A It varies depending on -- Washington varies
13 depending on what tracks are in session. We can get
14 around 40 people in the room and sometimes just 10 that
15 meets. On a day when people -- well, the lowest number
16 of students that we ever had was about 10 students.

17 Q That is just students or students and teachers
18 combined?

19 A Just students. At Crenshaw we had up to 70
20 students attend a meeting before and the lowest number
21 of students we had was 10 -- again 10.

22 Q How often do you guys meet?

23 A The Community Coalition meets on Tuesdays and
24 Thursdays. During school -- not during school, but when
25 school -- like during the hours of school, when I

1 facilitate the meetings, we meet on Wednesdays and
 2 sometimes Thursdays, just in case we need to have
 3 another meeting.
 4 Q This is every week?
 5 A Yes.
 6 Q How long do the meetings last?
 7 A The meetings last approximately 45 minutes
 8 during school. And at the Community Coalition about two
 9 hours.
 10 Q Once you guys have talked about the problems,
 11 what else do you do besides have the meetings?
 12 MS. LHAMON: The question is vague.
 13 BY MS. VANSE:
 14 Q You have these meetings, you talk about
 15 problems at your school or at schools in general,
 16 correct?
 17 A Yes.
 18 Q Besides having the meetings, what else do you
 19 do?
 20 MS. LHAMON: The question is still vague.
 21 You can answer it.
 22 THE WITNESS: Just repeat the question at the
 23 end.
 24 BY MS. VANSE:
 25 Q Besides having the meetings, what else do you

1 do? Do you actually go out and try to help solve a
 2 problem? I'm not sure so I would you like you to
 3 describe it.
 4 A As far as try to solve the problem, we
 5 sometimes attend school board meetings. There is a
 6 couple times where we had meetings with the principal.
 7 In the Community Coalition we invited our principal,
 8 vice principals, administrators into the Community
 9 Coalition so we could meet with them. There were times
 10 where we met with Dr. Roy Romer and the district
 11 superintendent of the main district. And we staged
 12 protests and demonstrations.
 13 Q What were you protesting?
 14 A It depends on what the issue is during the time
 15 period. And some of the things that we protested were
 16 Proposition 21, gang injunctions.
 17 Q Anything else?
 18 A That's it.
 19 Q When was the last protest you had?
 20 A The last protest was this past Thursday.
 21 Q What were you protesting?
 22 A Gang injunctions.
 23 Q How about before that?
 24 A Before then we had a protest. That one was
 25 about equal access to college prep classes. That was

1 the theme of our protest. It was just basically to get
 2 more AP classes put into our schools.
 3 Q When did that take place?
 4 A That took place back in December,
 5 December 15th.
 6 Q Of 2000?
 7 A Yes.
 8 Q Any others besides that, those two that you --
 9 A Before then we were in a protest with the
 10 janitors who were on strike. And before then was the
 11 Proposition 21.
 12 Q Any other protests besides that, besides those
 13 two?
 14 A Those are all the ones that I participated in.
 15 Q Any others that you know?
 16 A Any others that I know before I joined the
 17 organization, they had a protest -- I don't know of any.
 18 Q Are the protests different than demonstrations?
 19 A Sometimes -- well, demonstration and protest I
 20 put it all in the same thing. Basically what we do, we
 21 just picket, we just walk around a general area. That's
 22 it.
 23 Q How many people usually participate?
 24 A We can get anywhere around from about 100 to
 25 200. The most we ever had was about 400 students.

1 Q What was that one for?
 2 A The one with the 400 students, I think that one
 3 was the Proposition 21.
 4 Q For the one last Thursday, how many people did
 5 you have?
 6 A One last Thursday we had about 50 students.
 7 Q How about the one in December?
 8 A The one in December we had about 100
 9 students -- 200 students.
 10 Q How long do they usually last?
 11 A The protests -- can you clarify the question?
 12 Q How long did your protest last Thursday last?
 13 A How long it lasted?
 14 Q Yes.
 15 A About an hour.
 16 Q Did anything happen as a result of your
 17 protest?
 18 A No. Well, if you could clarify the question.
 19 Anything happen as in what?
 20 Q Maybe I will just rephrase it. What happened
 21 as a result of your protest?
 22 A What happened? Jim -- what is his name? The
 23 elected mayor -- or not the elected mayor -- the person
 24 running for mayor, Hahn. He spoke to one of the members
 25 of the Community Coalition. And he -- I don't know what

1 they spoke about, but I know they spoke to each other
2 about the issue.

3 Q What was the second -- I have gang injunctions,
4 the janitors' strike, and Prop. 21. What was the second
5 protest that you said that you were involved in, I think
6 it was the December?

7 A The December was the protest in front of the --
8 in front of LAUSD headquarters.

9 Q For the classes?

10 A Yes. The AP classes.

11 Q What happened as a result of that protest?

12 A We spoke with Roy Romer and we spoke with
13 Genethia Hayes and McKenna. And after the protest back
14 in February we asked them to come to the Community
15 Coalition. They offered to give us some solutions to --
16 how to get -- as to get more AP classes and how many
17 more they were going to put into the schools. And
18 that's it.

19 Q What were their solutions?

20 A To get every student a copy of their
21 transcripts by the end of February.

22 Q February 2001?

23 A Yes. And another solution was to reformat
24 the -- reformat the transcripts to make it easier for
25 the students to read. Because they were saying that the

1 students were having a hard time reading the transcript.

2 Q How did difficulty in reading a transcript
3 affect AP classes?

4 A Because the students were demanding more AP
5 classes, the students -- I guess they wanted to -- they
6 told us that they wanted to take a look at the
7 transcripts so they could see what students really
8 needed the credits, because more credits are offered in
9 AP classes. And they wanted to know like the students
10 that were asking for the AP classes, whether they got
11 the AP classes or not by their second semester of
12 school.

13 Q Do you know what they were going to do if and
14 when they got the transcripts?

15 A They told us that we are going to have -- every
16 student that participated in the protest and the
17 students that are attending the schools, other students
18 that participate in the protest, they said that every
19 student in those schools were going to have a copy of
20 their transcripts by the end of March.

21 Q Okay. But do you know what they were going to
22 then do after they had had the transcripts and saw what
23 students needed the classes?

24 A They were going to reformat the transcripts.

25 Q Anything else?

1 A That's it.

2 Q Were there any other solutions that they
3 suggested?

4 A Not that I know of.

5 Q How about the janitor strike, did anything ever
6 happen because of that protest?

7 A The reason why I went to the janitor strike was
8 just to show our support. And like as to what they got
9 or received, I don't know.

10 Q Was that the same for Prop. 21, that
11 demonstration?

12 A The Proposition 21 demonstration there was no
13 visual results, nothing that I can really tell you.

14 Q Do you understand that you are plaintiff in
15 this case?

16 A Yes.

17 Q Do you know who you are suing?

18 A Yes.

19 Q Who is that?

20 A The State of California.

21 Q Anyone else?

22 A Not that I know of, no.

23 Q Have you seen the first amended complaint that
24 has been filed in this case?

25 A No.

1 Q Have you seen any other motions or documents
2 that have been filed in this case?

3 A Yes.

4 Q Which documents?

5 A I don't know the name of the documents, but
6 I've seen some other complaints.

7 Q Do you know like what it said or what it
8 pertained to? Kind of give us an idea.

9 A Other students' complaints that they have in
10 their school.

11 MS. LHAMON: Excuse me for a second. D'Andre,
12 do you know what a first amended complaint is?

13 THE WITNESS: No.

14 MS. VANSE: Why don't I do this: I'm going to
15 mark this as Exhibit 2 and that is the first amended
16 complaint.

17 MS. LHAMON: I'm going to request that you not
18 mark it just for copying purposes and I will stipulate
19 it is what you say it is.

20 MS. VANSE: That's fine. Agreeing to mark it
21 does not mean that we don't have to have it attached.

22 MS. LHAMON: It doesn't need to be an exhibit.
23 I will stipulate for the record that you are showing
24 D'Andre what is the first amended complaint.

25 MS. VANSE: That's fine. This is the first

1 amended complaint.
 2 MS. LHAMON: You can say if it looks like
 3 something I have showed you even if it doesn't look
 4 identical to it because this looks actually quite
 5 different than from what we use.
 6 MS. VANSE: Okay.
 7 THE WITNESS: I do recognize a few pages in
 8 here that I have seen in a document.
 9 BY MS. VANSE:
 10 Q But you don't remember if you saw the complaint
 11 in particular?
 12 A No.
 13 MS. LHAMON: Do you know what a complaint in
 14 particular means?
 15 THE WITNESS: Yes.
 16 BY MS. VANSE:
 17 Q About how many documents have you seen that
 18 perhaps had a caption page that looked like this that
 19 had the attorneys' names on it or with the court kind of
 20 on the side?
 21 MS. LHAMON: Do you know what a caption means,
 22 caption page?
 23 THE WITNESS: No.
 24 BY MS. VANSE:
 25 Q Have you seen any documents that have listed

1 your attorneys names and other attorneys on the front
 2 page?
 3 A Yes.
 4 Q About how many documents?
 5 A Maybe about one. I think only one.
 6 Q How did you learn about this case?
 7 A I learned about this case when a few attorneys
 8 asked me about --
 9 MS. LHAMON: I'm going to instruct you not to
 10 talk about anything an attorney said to you, but you can
 11 say how you learned about it.
 12 THE WITNESS: I learned it through other
 13 attorneys.
 14 BY MS. VANSE:
 15 Q Do you know what the attorneys' names were?
 16 A No.
 17 Q How many were there?
 18 A Two.
 19 Q Do you know if they were from the ACLU?
 20 A Yes.
 21 Q When did you hear about the case for the first
 22 time?
 23 A Back in last May.
 24 Q May 2000?
 25 A Yes.

1 Q Did they call you on the phone?
 2 A Yes.
 3 Q How many times?
 4 A Approximately --
 5 MS. LHAMON: Objection; that is vague as to
 6 time.
 7 BY MS. VANSE:
 8 Q How many times in May did you receive a phone
 9 call from the ACLU?
 10 A In May, only about two times.
 11 Q How long were the conversations?
 12 A I don't know. I'm not sure.
 13 Q Can you estimate? Were they five minutes, a
 14 half hour?
 15 A I really can't remember.
 16 Q Anything else, any other contact in May?
 17 A Through letters.
 18 Q How many letters?
 19 A I can't remember.
 20 Q Can you estimate? Were there less than ten,
 21 more than five?
 22 MS. LHAMON: You shouldn't guess. You should
 23 just state to the best of your memory.
 24 THE WITNESS: I can't remember.
 25 BY MS. VANSE:

1 Q Any other attorneys that you spoke with?
 2 A There were --
 3 MS. LHAMON: I'm sorry. I'm going to object
 4 again. It is vague as to time.
 5 BY MS. VANSE:
 6 Q When did you become a plaintiff in this case?
 7 A I became a plaintiff about -- it's been awhile
 8 so I really can't remember like the time. I can't
 9 remember the time because it's been like an ongoing
 10 thing over a long period of time.
 11 Q Can you think of a time when you first recall
 12 becoming a plaintiff? Would that be in May when you
 13 first talked with the attorney?
 14 A Can you clarify? I don't understand that
 15 question.
 16 Q You understand that you are plaintiff in this
 17 case?
 18 A Yes.
 19 Q When do you think you became a plaintiff in
 20 this case?
 21 A When do I think I became a plaintiff?
 22 Q Yes.
 23 A When I gave my declaration.
 24 Q When was that?
 25 A Back in May of 2000.

1 MS. LHAMON: Counsel, you have his declaration
2 and the document speaks for itself because it has a date
3 on it.

4 MS. VANSE: I'm still trying to get an
5 understanding of when he thinks he started his
6 complaint.

7 Q What made you think about suing?

8 A I really didn't consider suing. It was just
9 that I wanted to just give my testimony as to the
10 conditions that I experienced in school.

11 Q Did you think about that before May 2000?

12 A Yes.

13 Q When?

14 A When I entered high school, about when I got
15 into my -- let's see. After my first semester of high
16 school in the 9th grade, my first semester in the 9th
17 grade.

18 Q You thought about suing then or you just
19 thought --

20 A At first --

21 MS. LHAMON: Objection; mischaracterizing his
22 testimony.

23 BY MS. VANSE:

24 Q What did you think about when you entered high
25 school that first semester in the 9th grade?

1 A It was just something that we were talking
2 about.

3 Q Who were you talking about it with at the
4 Community Coalition?

5 A Can you clarify the question?

6 Q You said that you were talking about it with
7 people at the Community Coalition?

8 A Yes.

9 Q Who were those people?

10 A Just other students and people that worked
11 within the Community Coalition.

12 Q Can you give me any name?

13 A No. I would rather not give any names.

14 Q I understand that, but to the extent that you
15 do remember, I would like you to give me the names.

16 MS. LHAMON: You are under oath today and
17 unless it is something that I tell you shouldn't
18 answer, then you do need to give her the answer. We
19 will we be okay for you to give it to them.

20 THE WITNESS: As far as people that worked
21 within the Community Coalition, worked with the
22 Community Coalition, I talked to Marqueece Dawson.

23 MS. LHAMON: Do you want to spell that for the
24 reporter, please.

25 THE WITNESS: M-a-r-q-u-e-e-c-e. Dawson,

1 MS. LHAMON: Objection; vague as to "What did
2 you think about."

3 BY MS. VANSE:

4 Q What did you think about your school?

5 MS. LHAMON: That continues to be vague.

6 But you can answer if you know.

7 THE WITNESS: I don't understand the question.
8 Do you mean what did I think personally as to the
9 conditions in my school?

10 BY MS. VANSE:

11 Q Actually I'm going to get to that so I will
12 just ask you another question. I will go back to May
13 when you talked with the ACLU attorneys. Did you
14 contact them or did they contact you?

15 A They contacted me.

16 Q Do you know how they got your name or your
17 number?

18 A Yes.

19 Q How?

20 A Through the Community Coalition.

21 Q Do you know why the Community Coalition gave
22 them your name or number?

23 A Initially because of my complaints. I guess
24 they felt as if it was something I wanted to do.

25 Q You had complained to the Community Coalition?

1 D-a-w-s-o-n. And I spoke to Alberto Retana. First name
2 A-l-b-e-r-t-o. Retana, R-e-t-a-n-a.

3 BY MS. VANSE:

4 Q Is that it?

5 A And students? Do you want me to give you the
6 names of students?

7 Q Yes.

8 A Jorge Hernandez. Jorge is J-o-r-g-e.
9 Hernandez, H-e-r-n-a-n-d-e-z.

10 Q Anyone else?

11 MS. LHAMON: To the extent that you can
12 remember specifically who you spoke to.

13 THE WITNESS: Brian Hawthorn. B-r-i-a-n.
14 Hawthorn, H-a-w-t-h-o-r-n. And that's it.

15 BY MS. VANSE:

16 Q What did you talk about?

17 A Just different conditions that we were
18 experiencing in school, because Jorge and Brian both go
19 to Washington and it just happened to be something we
20 brought up in the conversation. And we always talked
21 about it all the time.

22 Q How often did you meet with these people?

23 A Well, since --

24 MS. LHAMON: Vague as to time.

25 You can answer.

1 THE WITNESS: Sometimes I met with them while
2 we were at the Community Coalition. Sometimes I met
3 with them when they came to my school. Just different
4 occasions, whenever I saw them.

5 BY MS. VANSE:

6 Q Can you tell me approximately how many times
7 you met with these -- any one of these people that you
8 just told me about and talked about the conditions at
9 your school prior to bringing your lawsuit?

10 A Well, I met with Marqueece Dawson and Alberto
11 because they work at the Community Coalition and I go
12 there every Tuesday and Thursday. That is how many
13 times I spoke to them. It wasn't just like we talked
14 about it all the time every time I went. It was just
15 whenever the conversation was brought up.

16 Q So with the two workers from the coalition, can
17 you give me the number of times that you talked about
18 the conditions at your school? Do you know how many?
19 You said you talked to them often, right?

20 A Yes.

21 Q Do you have any idea about how many times you
22 talked to them about the school and the conditions
23 rather than something else?

24 A Approximately about four -- it was every time I
25 went to the Community Coalition. Every time I went to

1 conversation whenever we had separate meetings, because
2 we have breakouts also during the meetings where
3 different students go into different groups and discuss
4 different issues.

5 Q Were there any other students talking about --
6 let me rephrase that.

7 Do you know if there were any other students
8 that were thinking -- were interested -- did the workers
9 talk to any other students about suing?

10 A Yes.

11 MS. LHAMON: Objection; calls for speculation.

12 BY MS. VANSE:

13 Q Do you know what students they talked to?

14 A No. I'm not going to answer that question.

15 MS. LHAMON: Unless I tell you not to answer a
16 question, you do need to answer it. So if you know, you
17 should let her know. And I put my objection on the
18 record that I think it calls for speculation.

19 THE WITNESS: I don't know them by name, but I
20 know they did talk to other students.

21 BY MS. VANSE:

22 Q Do you know how many?

23 A No.

24 Q And this was Marqueece and Alberto talked to
25 other students?

1 the meetings.

2 Q And you went to the meetings every Tuesday?

3 A Yes. Tuesday and Thursday.

4 Q And this was all semester?

5 A Yes.

6 Q Over your 9th grade year?

7 A Yes.

8 Q The second semester of your 9th grade year
9 also?

10 A It was all through my high school year, 9th and
11 10th grade.

12 Q So there were a lot of meetings that you had
13 with these people?

14 A Yes.

15 Q Out of those meetings about how many times do
16 you think you talked about the conditions at your
17 school?

18 A Maybe about -- it was probably every time I
19 went. I think it was about every time. It was every
20 Tuesday and Thursday because that is what our main focus
21 was, to talk about the conditions in our school and what
22 we can do about them.

23 Q How about with the students that you mentioned?

24 A With the students they are within the meetings
25 so they either heard about it or participated in the

1 A No.

2 Q Who talked to them?

3 A It was other ACLU attorneys.

4 Q Do you know if any other students from your
5 coalition are plaintiffs in this case?

6 A No.

7 Q No, you don't know or no, they are not?

8 A I don't know.

9 Q Do you know how the ACLU contacted the
10 coalition?

11 A No.

12 Q Prior to the coalition discussions we've
13 already talked about and the meetings with your
14 attorneys, have you discussed filing the lawsuit prior
15 to May with anyone else?

16 A No.

17 Q Have you had -- do you know the other groups
18 that are involved with the plaintiffs in this lawsuit?

19 A No.

20 Q Have you had any contact with the Public
21 Advocates?

22 A I don't know who -- what do you mean by "Public
23 Advocates"?

24 Q So you haven't had any contact with them? They
25 are a group.

1 A They are a group? No, I haven't had any
 2 contact with them.
 3 Q The Center for the Law and the Public Interest?
 4 A No.
 5 Q Lawyers Committee for Civil Rights?
 6 A No.
 7 Q How about students or professors from Loyola
 8 Law School?
 9 A No.
 10 Q UCLA Law School?
 11 A Yes.
 12 Q Who?
 13 A I don't know them by name.
 14 Q They talked to you about this lawsuit?
 15 A No.
 16 Q This was something unrelated to this lawsuit
 17 that you spoke to the UCLA Law School students or
 18 professors about?
 19 A I wouldn't know whether they were discussing
 20 the same issue or a different issue, but I know that --
 21 MS. LHAMON: I'm going to instruct you not to
 22 discuss the contents of the conversations you had with
 23 the UCLA law students to the extent that they were
 24 acting as agents for me, for the lawyers in this case.
 25 BY MS. VANSE:

1 Q When did you speak with them?
 2 A I did not speak with them personally.
 3 Q What was your contact with them?
 4 A Well, I think one -- I'm not sure. I'm not
 5 sure if they were actual attorneys or lawyers
 6 participating. I know they were a part of the UCLA Law
 7 School. But I had contact with maybe about one or two
 8 of them. And one was I think to -- one of them came --
 9 MS. LHAMON: You don't want to talk about the
 10 content of what you were talking about. You can say
 11 when, you can say how long, but you don't want to say
 12 anything what the purpose was.
 13 THE WITNESS: Okay.
 14 MS. LHAMON: Thanks.
 15 THE WITNESS: I did talk to two of them.
 16 BY MS. VANSE:
 17 Q When was that?
 18 A Back in I think sometime around May. Again,
 19 May.
 20 Q May 2000?
 21 A Yes.
 22 Q You talked with them in person?
 23 A I think one occasion I did.
 24 Q How about on the other occasion?
 25 A On the other occasion it was by telephone.

1 Q Any other contact with UCLA students or
 2 professors?
 3 A No.
 4 Q You said you met in person one time?
 5 A Yes.
 6 Q Do you remember the name of the UCLA person?
 7 A No.
 8 Q How long was the meeting?
 9 A It was only about maybe 30 minutes to an hour.
 10 Q How about the second, the telephone call?
 11 A I can't remember.
 12 Q That was in May also?
 13 A Roughly around May. I think it was maybe about
 14 the end of May, the beginning of June.
 15 Q Have you had any contact with anyone from the
 16 Georgetown University Law Center?
 17 A No.
 18 Q Mexican-American Legal Defense and Educational
 19 Fund?
 20 A No.
 21 MS. LHAMON: We have been going for almost an
 22 hour and a half and I need a break.
 23 MS. VANSE: That's fine.
 24 (Recess from 10:50 a.m. to 11:01 a.m.)
 25 BY MS. VANSE:

1 Q Do you know that the action you are
 2 participating in is being brought as a class action?
 3 A What do you mean by a "class action"?
 4 Q Do you know what a class action is?
 5 A No.
 6 Q Has anyone ever talked to you about what a
 7 class action is?
 8 A We talked -- well, me and my attorney --
 9 MS. LHAMON: You shouldn't talk about what we
 10 said.
 11 THE WITNESS: Okay.
 12 BY MS. VANSE:
 13 Q Did you discuss it, though? You don't have to
 14 tell me what the content of the conversation was, but
 15 did you discuss what a class action is?
 16 MS. LHAMON: I'm going to instruct you not to
 17 answer that because that is the content of the
 18 conversation.
 19 BY MS. VANSE:
 20 Q Do you know what the class and subclass
 21 definitions are in this case?
 22 A No. And I don't know -- I don't understand --
 23 I didn't understand the question.
 24 Q What didn't you understand about the question?
 25 A The whole question.

1 MS. VANSE: Can you read back to me what his
2 response was to "Do you know what a class action is?"
3 (Record read.)
4 BY MS. VANSE:
5 Q Do you know what a class action lawsuit is in
6 general?
7 A No.
8 Q Do you know what it means to have a class of
9 plaintiffs?
10 A No.
11 Q Are you a member of a class?
12 A Yes.
13 Q In this action?
14 A Yes.
15 Q Do you know what that means?
16 A As far as I know, being a part of a class means
17 that I'm part of a group that are experiencing or
18 complaining about the same conditions they are all
19 experiencing.
20 Q Do you know what that group is?
21 A No.
22 Q What do you think the group is?
23 A I really couldn't tell you. I don't understand
24 the question.
25 Q You said that you are part of a group that is

1 Q Students all over?
2 A Students -- yeah, all over. Students who
3 are -- who are experiencing the same conditions that I'm
4 experiencing in school, or if they have any issues that
5 they are facing in school as far as the conditions.
6 Q As a plaintiff in this action do you have any
7 duties?
8 A Duties as in what? I don't understand the
9 question.
10 Q What don't you understand?
11 MS. LHAMON: He said he doesn't understand
12 "duties."
13 BY MS. VANSE:
14 Q You don't understand "duties"?
15 A No.
16 Q Do you know what a duty is?
17 A Yes.
18 Q Do you have any duties in this action?
19 A Just to give my testimony.
20 Q Anything else?
21 A That's it.
22 Q Do you have any duties to other plaintiffs?
23 A Not that I'm aware of.
24 Q To other students?
25 A Not that I'm aware of.

1 bringing complaints about something in this action or
2 something to that effect?
3 A Yes.
4 Q What is that group?
5 MS. LHAMON: You've already asked that
6 question. He said he didn't understand it.
7 THE WITNESS: I don't know.
8 BY MS. VANSE:
9 Q You just said -- you just used the word
10 "group"; that you were part of a group.
11 A Um-hum.
12 MS. LHAMON: Are you asking who is in that
13 group or what that group is composed of?
14 MS. VANSE: Yes.
15 Q I'm asking what you understand when you said
16 and you used the word "group." What you think the word
17 "group" as you just used it means? What group is that?
18 A Group as in a collective of people.
19 Q Okay. As you used it, what group of people
20 does that include?
21 A The people who are experiencing the same
22 conditions that I'm experiencing in school.
23 Q Can you be more specific about what people, if
24 you know?
25 A Students.

1 Q Are you entitled to any extra benefits for
2 serving as the plaintiff?
3 A No. The only thing I know of -- no.
4 Q Will you be paid for serving as a plaintiff?
5 A No.
6 Q Do you have an agreement to pay your attorneys?
7 A No.
8 Q Are you willing to pay your attorneys' fees or
9 costs if there are any?
10 A No.
11 Q Do you understand who, if anyone, is
12 responsible for the fees and costs of your attorneys?
13 A Can you ask the question again?
14 Q Sure. If there are fees and costs for your
15 attorneys, do you understand who is responsible for
16 them?
17 A Yes.
18 Q Who?
19 A My attorney.
20 Q Your attorneys are responsible for their fees
21 and costs?
22 A Yes.
23 Q Anyone else?
24 A Not that I'm aware of.
25 Q What are you seeking as a plaintiff?

- 1 A What am I seeking as in -- can you clarify it
2 for me?
- 3 Q Sure. You brought this action. What are you
4 trying to achieve by bringing it?
- 5 A As far as what do I expect out of it?
- 6 Q Okay.
- 7 A Just for -- well, for the conditions that I'm
8 experiencing in school to be changed. Make my school
9 better for me to learn.
- 10 Q How do you think being a plaintiff and bringing
11 this action will change that?
- 12 A Just to make you aware that the conditions that
13 I'm facing are there.
- 14 Q Anything else?
- 15 A No.
- 16 Q Can you give me a list of the classes that you
17 had for your -- at Crenshaw -- actually, first let me
18 ask this: Does Crenshaw have semesters or quarters?
19 How is it set up?
- 20 A They have quarters within semesters. They have
21 four quarters for every semester and there are two
22 semesters which makes eight quarters.
- 23 Q When does the school year generally start?
- 24 A Usually it starts in September, depending on
25 the -- well, sometimes they -- depending on how many

- 1 days are required to be in school. It starts in
2 September, but depending on what week -- like the first
3 week that falls in September, it is usually around the
4 7th or 8th of September.
- 5 Q When does the first quarter end?
- 6 A The first quarter ends usually in December.
7 Right before Christmas.
- 8 Q When does the second quarter start?
- 9 A Usually in January.
- 10 Q That ends when?
- 11 A It ends in June.
- 12 Q Those are two quarters?
- 13 A Yes. No. Those are two semesters.
- 14 Q When does the first quarter end?
- 15 A The first quarter ends after 20 weeks. Well,
16 after five weeks. They do it every five weeks. They
17 end the quarter every five weeks.
- 18 Q So that would mean generally September to
19 October, the beginning of October?
- 20 A They are 20 weeks in a semester. There are 20
21 weeks in every semester. So after the 20 weeks -- well,
22 from September after the 20 weeks are up, then that's
23 the end of the first semester. Then we go on a break
24 and then when January comes at the end of the 20 weeks,
25 which usually is in June, that's the end of the second

- 1 semester.
- 2 Q Do you take classes based on quarters or
3 semesters?
- 4 A We take them based on semesters.
- 5 Q For the fall semester 2000, that would be like
6 the first semester, what classes did you take?
- 7 A In the fall semester in my 9th grade year?
- 8 Q At Crenshaw. I think this would be the start
9 of your 10th grade year.
- 10 A I took English.
- 11 Q Was there a certain level of English, like
12 English 1 or 2?
- 13 A It was English 10-A and they do it based on
14 your grade level. So 10-A is -- the 10-A stands for
15 10th grade, semester A, which is the first semester. I
16 took biology 10-A. And I would also like to add the
17 English class and the biology class were both honors
18 classes. And I took algebra, honors algebra. I took
19 world history, honors world history, Spanish.
- 20 Q Did Spanish have a designation like 1 or 2?
- 21 A Spanish is 2-A, which means I was in my second
22 year of Spanish, first semester. And the other class
23 was leadership. That's what it was. Leadership, which
24 is student government. It was student body government.
- 25 Q And that is a class? It is not like an

- 1 election?
- 2 A That is the class where we make decisions for
3 what is going to happen for that semester. We work with
4 the administrators as far as planning events. That's
5 why it's titled "student government." It's the
6 government that controls what happens in the school.
- 7 Q Can anyone get into that class?
- 8 A You have to have a certain GPA and you have to
9 have teacher recommendations. And after you get --
10 after they determine your GPA from the previous school
11 year and you get your teacher recommendations, you have
12 to run for a student body office, which is either
13 president, vice president, parliamentarian, secretary,
14 or treasurer of your grade level.
- 15 Q That is part of the class, you run for an
16 office?
- 17 A Well, actually it happens before you enter the
18 class. So if you want to be in it for your 10th grade
19 year, the first semester, you have to run and campaign
20 in your 9th grade year in the second semester. And they
21 designate a time period where you do campaign.
- 22 Q Any other classes?
- 23 A That's it. It's only six classes per semester.
- 24 Q Prior to your transfer to Washington, what
25 classes were you enrolled in?

- 1 A Those are the classes I took in Crenshaw for my
2 10th grade year.
3 Q For the whole year?
4 A Yes.
5 Q So both semesters you took these classes?
6 A Yes. Because those are full semester classes.
7 You have to take those for a whole two semesters, which
8 makes up a whole school year.
9 Q Say, for example, in your English class, the
10 second semester it would be English 10-B?
11 A Yes.
12 Q What about for your 9th grade year at Crenshaw,
13 what did you take?
14 A For my 9th grade year at Crenshaw, I originally
15 started in Algebra 9-A, and then for the second semester
16 it turned into math investigations. I took health,
17 education, and career planning. The health was for the
18 second semester and the education and career planning
19 was for the first semester. I took Spanish and that one
20 was Spanish -- what was the title? -- it was Spanish 1-A
21 and B, because I took a full year. I took regular
22 science. It is just titled "Science."
23 Q Was that science class the same for both
24 semesters?
25 A Yes. And I took -- did I put English on there?

- 1 A Ms. Ortiz. O-r-t-i-z.
2 Q Did leadership have a teacher?
3 A Yes. Mr. Mosbenmosche.
4 M-o-s-b-e-n-m-o-s-c-h-e. And that is one whole name.
5 Q Were these the same teachers you had for the
6 second semester?
7 A Yes. For the second semester, yes.
8 Q Did you have these teachers the entire time or
9 were there substitutes at times?
10 A It was only maybe about one or two times we had
11 a substitute for Mr. Mosbenmosche. Only one time we had
12 one for Ms. Lowe. And three times for Ms. Coreley. And
13 maybe about only one time for Ms. Ortiz. And for
14 Ms. Palomino it was maybe about twice.
15 Q Any for Ms. Mims?
16 A Ms. Mims, only about twice.
17 Q Other than those substitutes did you have any
18 other teachers in these classes?
19 A Any other teachers other than what?
20 Q Did you start the year with a different
21 teacher?
22 A No.
23 Q Any teacher aides?
24 A No.
25 Q How about for your 9th grade, who did you have

- 1 Q No, I don't have English.
2 A I took English. And that will be titled 9-A
3 and B because I took it for a full year. And I think
4 that was all six. Is that six classes?
5 Q I have five.
6 A The sixth class was PE, which is physical
7 education.
8 Q Did you have to take PE in 10th grade?
9 A Yes. But the option is if you are going into
10 leadership, you can take PE either in your 11th grade
11 year or your 12th grade year because they prefer that
12 you stay in leadership for at least a full two years.
13 Q Who was your teacher for English 10-A?
14 A For English 10-A was Ms. Lowe.
15 MS. LHAMON: Can you spell that.
16 THE WITNESS: L-o-w-e.
17 BY MS. VANSE:
18 Q For biology?
19 A Ms. Coreley, C-o-r-e-l-e-y.
20 Q Algebra?
21 A Ms. Palomino. P-a-l-i -- no. It's
22 P-a-l-o-m-i-n-o.
23 Q World history?
24 A Ms. Mims. M-i-m-s.
25 Q Spanish?

- 1 for algebra?
2 A For algebra I had [REDACTED]
3 [REDACTED]
4 What is the next class?
5 Q Education and career planning.
6 A Mr. -- what is his name? Mr. Patrick.
7 P-a-t-r-i-c-k.
8 Q Spanish?
9 A Spanish I had Mr. Diaz. D-i-a-z.
10 Q Science?
11 A Mr. Hill. H-i-l-l.
12 Q English?
13 A For English I had Ms. Amaeche. A-m-a-e-c-h-e.
14 And then for the second semester of English I had
15 Mr. Camagian. C-a-m-a-g-i-a-n.
16 Q And PE?
17 A PE I had Ms. Stewart. S-t-e-w-a-r-t.
18 Q Other than the English teacher you had all
19 these teachers in your second semester as well?
20 A For the health, because health is on there for
21 the second semester, I had Mr. Jones. J-o-n-e-s.
22 Do you want the substitute for Mr. Patrick?
23 How many times he was absent?
24 Q Sure.
25 A Mr. Patrick only stayed for about five -- well,

1 two weeks. Originally for the first semester we had a
2 substitute for about five weeks. Mr. Patrick came for
3 two weeks. And then he was off again for another five
4 weeks and then came back two weeks. And then for the
5 last, say, about three weeks of school we had another
6 substitute.

7 Q Do you remember the name of your first
8 substitute teacher in education and career planning?

9 A No.

10 Q How about the second?

11 A No.

12 Q The third?

13 A No.

14 Q Was it the same teacher?

15 A No. Whenever we had a substitute, sometimes
16 one substitute would stay for a week. It was one
17 substitute in particular that she stayed for like the
18 first five weeks, and then when Mr. Patrick came back
19 and he started leaving and coming back on and off, we
20 had like different substitutes every day.

21 Q For the first five weeks of education and
22 career planning, you had the same substitute for five
23 weeks?

24 A Yes.

25 Q And then for the second five weeks that

1 they were off and on. They would only stay for about a
2 day and then we would have another substitute the next
3 day.

4 Q Did you have [REDACTED] for math
5 investigations?

6 A Yes.

7 Q Can you tell me about how many times a week she
8 was late?

9 A She was late four times a week.

10 Q And each time --

11 A Well, it varies because sometimes she will be
12 late every day of the week, and then some weeks she will
13 come early to school maybe about once a month. She will
14 come to school early once a month and for whatever
15 reason but she was there early. She will be there
16 before we get there and that was only about once a
17 month. But all the other times she will come 30 minutes
18 late, 10 minutes late, or sometimes she wouldn't come at
19 all and that is when we would have the substitute.

20 And then there were a lot of times when she
21 wouldn't show up for our period and when we would go up
22 later on during the day just to see if she eventually
23 came, she will be there. And there was never a time
24 like a substitute that will stay for like a whole week.
25 There was never a time when we would have a substitute

1 Mr. Patrick was gone, you had about how many
2 substitutes, do you remember?

3 A No. After Mr. Patrick came back and he left
4 again, the substitutes that would come in, they would
5 stay for about maybe one or two days, and they would
6 leave and then we would have a different substitute. So
7 it was like different substitutes almost every day.

8 Q And for the last three weeks?

9 A For the last three weeks, the same way.

10 Q With a different substitute every one or two
11 days?

12 A Yes.

13 Q Other than Mr. Patrick, did any of your other
14 teachers have substitutes?

15 A Mr. Diaz -- no. Well, Mr. Diaz, he was only
16 absent maybe about one time.

17 [REDACTED] she would -- what would happen,
18 she would come late in the morning. And like I had her
19 first period and so she -- we would miss about 30
20 minutes of class, the first half of class, because she
21 would come in late. And a lot of times we would either
22 stand in the hallway or every now and then
23 administration -- an administrator would come and open
24 the door. There were a lot of times we had a
25 substitute. And again the substitutes that would come,

1 like that. It will be a different substitute every day
2 of the week.

3 Q Was [REDACTED] late more than she never
4 showed up?

5 A Yes.

6 Q How many times do you think she never showed up
7 for class?

8 A Maybe about -- I really couldn't give you the
9 number of days. But I can tell you she never showed up
10 maybe about five times -- well, ten times a month.

11 Q This is both semesters?

12 A Yes.

13 Q And you had algebra every day?

14 MS. LHAMON: Could I just ask a point of
15 clarification?

16 Did you have the same teacher, [REDACTED]s,
17 for math investigations and for algebra?

18 THE WITNESS: Yes.

19 MS. LHAMON: So are we talking about both
20 semesters when you were estimating the times when she --

21 THE WITNESS: Yes.

22 BY MS. VANSE:

23 Q Did you ever have another teacher start the
24 class for [REDACTED]

25 A Yes, a lot of times.

1 Q What teacher would do that?
 2 A Ms. Lyons. Or an administrator named
 3 Ms. Macadoo.
 4 MS. LHAMON: Would you spell that for the court
 5 reporter.
 6 THE WITNESS: M-a-c-a-d-o-o. And she was an
 7 assistant principal.
 8 BY MS. VANCE:
 9 Q Would they start the class every time she was
 10 late or not there?
 11 A Well, sometimes we had a sub that would start
 12 the class, and I never did get their name. And a lot of
 13 times when they would start the class it wouldn't be
 14 pertaining to algebra or math at all. It would be on a
 15 different topic.
 16 Q Like what?
 17 A One lady -- one sub, she came in and she taught
 18 us how to make bread or something, how to bake or
 19 something like that.
 20 Q Do you know how many times a substitute came in
 21 and talked about something other than math?
 22 A About three times.
 23 Q Was this three times all year, the math -- the
 24 algebra and math?
 25 A Well, altogether, because I think -- well, it

1 was only three times for the second semesters. But for
 2 the first semesters it was maybe about another three
 3 times so altogether it was six.
 4 A lot of times Ms. Lyons would come in and she
 5 will talk about planning goals, making goals for
 6 yourself. There was one time where she started the
 7 class and [REDACTED] she came in late, but she never
 8 did pick up on where Ms. Lyons left off. Ms. Lyons had
 9 stayed in the class and she talked to us during the
 10 whole period.
 11 Q About something other than math?
 12 A Yes. That was the time when she talked about
 13 goal planning.
 14 Q What would Ms. Macadoo talk about when she
 15 started the class?
 16 A Ms. Macadoo, she would talk about -- she would
 17 tell us to finish up work that [REDACTED] had started
 18 the day before. And a lot of times we would have to
 19 tell her that either [REDACTED] didn't give us any
 20 work or she didn't show up the day before for us to
 21 begin any work the next day.
 22 And there were times when Ms. Lyons would start
 23 the class and [REDACTED] would come in late. And
 24 there was a time where they would strike up an argument.
 25 Q Ms. Macadoo and [REDACTED]

1 A Ms. Lyons and [REDACTED]. They argued
 2 before.
 3 Q Do you know about how many times they would
 4 argue?
 5 A Twice.
 6 Q That was the same class?
 7 A Yes.
 8 Q Was this twice in the first semester or twice
 9 all year?
 10 A Twice in the second semester.
 11 Q Do you know what they argued about?
 12 A They argued when Ms. Lyons was talking about
 13 goal planning. And then Ms. Lyons -- she was a
 14 counselor so she touched on like all the topics. And
 15 she only talked about goal planning for about -- maybe
 16 about ten minutes and then she went on to a different
 17 type of math that we didn't understand. And when she
 18 was trying to explain it, [REDACTED] interrupted and
 19 then they started arguing.
 20 Q What about the second time they argued?
 21 A The second time they argued was over the same
 22 thing. But the way it came up with them arguing was
 23 that Ms. Lyons started the class and [REDACTED]
 24 stepped in, and I guess they were still mad about what
 25 happened the last time, so they were kind of like still

1 angry at each other. And instead of [REDACTED]
 2 interrupting the second time, she -- I don't know how
 3 they started arguing, but I know they just started
 4 arguing.
 5 Q Do you remember about how long their argument
 6 lasted?
 7 A It was only about five minutes. And it wasn't
 8 like a loud argument, but it was to where all the
 9 students knew they were arguing.
 10 Q Other than the goals class and the one
 11 substitute who talked about bread, were there any other
 12 subjects that were -- like a substitute would talk about
 13 besides math?
 14 A No.
 15 Q So all the other substitutes talked about math
 16 on did math instruction?
 17 A Well, a lot of times the subs, they would just
 18 go to their seat, take roll, and that was it. And the
 19 class would just talk the rest of the period. It was
 20 mainly about once or twice when [REDACTED] actually
 21 left us an assignment because she knew she was going to
 22 be absent.
 23 Q Do you know why [REDACTED] was late?
 24 A No. At one time she did tell us that her car
 25 broke down, but she said it happened to her on the

1 weekend and she said now she had to take the bus. But
 2 even before then she was always late.
 3 Q Did you ever ask her why she was late?
 4 A I asked her and she told me it was none of my
 5 business.
 6 Q Did you ever talk to anyone at school about her
 7 being late?
 8 A Yes. I talked to Ms. Lyons, and Ms. Lyons told
 9 me that she tried to talk to [REDACTED] and she
 10 told -- she also told me that -- well, they had a
 11 separate conference with each other about being late and
 12 she told me that's part of the reason why they argued
 13 one of those days. And I talked to my principal about
 14 it. And my mom also went to go talk to my principal
 15 about it.
 16 Q Anyone else?
 17 A No.
 18 Q Do you know if any other students talked to the
 19 principal or complained about [REDACTED] being late?
 20 A Yes.
 21 Q How many students do you think?
 22 A About five other students.
 23 Q How do you know that they complained?
 24 A Because they told me about it. And it was
 25 other times when they told me that they saw my mom

1 talking to the principal at the same time they went to
 2 go talk to him. So they were asking me about it.
 3 Q Were these students in your algebra class or in
 4 your math investigations class?
 5 A They were in both of my classes, because a lot
 6 of the students that did complain were the students that
 7 were in the algebra class the semester before.
 8 Q Did you complain the first or second semester?
 9 A I complained the first and second semester.
 10 Q How many times did you complain the first
 11 semester?
 12 A The first semester only about once.
 13 Q Who was that to?
 14 A The principal.
 15 Q Any other complaints about [REDACTED] the
 16 first semester?
 17 A No.
 18 Q The second semester how many times?
 19 A About two other times. Another person that I
 20 did complain to was the assistant principal, Mr. Pozzo.
 21 P-o-z-z-o.
 22 Q He complained or you complained to him?
 23 A I complained to him.
 24 Q That was the second semester?
 25 A Yes.

1 Q You complained to the principal the second
 2 semester also?
 3 A Yes.
 4 Q Do you know who your mom spoke to?
 5 A My mom spoke to Mr. Pozzo and Mr. Kiel, which
 6 is the principal. Mr. Kiel is K-i-e-l.
 7 Q Do you know about when that was, like about
 8 what month?
 9 A No. I don't remember.
 10 Q Was it towards the beginning of the semester?
 11 A It was I think in the middle of the semester,
 12 of the second semester.
 13 Q Did anything change after you complained the
 14 first semester?
 15 A Well -- no.
 16 Q Did anything change after you complained the
 17 second semester?
 18 A No.
 19 Q How about when your mom complained?
 20 A When my mom complained she was told that there
 21 would be some change but nothing ever happened.
 22 Q You said other students complained also?
 23 A Yes.
 24 Q Was that the first semester or second?
 25 A Second semester.

1 Q Do you know if any other students complained
 2 the first semester?
 3 A Yes. Maybe about one or two.
 4 Q How do you know that?
 5 A Because they told me. And there were times
 6 when they asked me to go to the office with them to
 7 complain. And they want to the office because
 8 afterwards I would see them in the office talking to the
 9 principal about it. And then a lot of times when they
 10 do go complain to the principal or assistant principal,
 11 the assistant principal or the principal would come in
 12 and walk back to the class with them and talk to
 13 [REDACTED].
 14 Q About how many times did that happen?
 15 A Three times.
 16 Q Three times the first semester?
 17 A First and second together.
 18 Q The first time was it the principal or vice
 19 principal that came back with the students to the class?
 20 A It was the vice principal.
 21 Q Do you remember when that was?
 22 A No.
 23 Q Was it the first time the first semester?
 24 A Yeah. It was the first time the first
 25 semester.

- 1 Q Do you know what the vice principal said to
2 [REDACTED]?
- 3 A No.
- 4 Q How long was he in class?
- 5 A The vice principal?
- 6 Q Yes.
- 7 A The first time, it was about 10 to 15 minutes.
- 8 Q Did he talk with [REDACTED] in class or out?
- 9 A The first time he took [REDACTED] out of
10 class. The second time they talked to each other inside
11 the class.
- 12 Q When was the second time, the first semester or
13 second semester?
- 14 A The second semester.
- 15 Also during the second semester the principal
16 came to talk to [REDACTED], but he took her outside to
17 talk to her.
- 18 Q And that would be the third time?
- 19 A Yes.
- 20 Q Do you know what was said during any of those
21 times?
- 22 A No.
- 23 Q Do you know if [REDACTED] is still at
24 Crenshaw?
- 25 A Well, before I left she was there.

- 1 Q I think I may come back to [REDACTED], but we
2 are going to move on to something else now.
- 3 There are six periods in a day at Crenshaw?
- 4 A Yes.
- 5 Q Does that include lunch?
- 6 A Yes -- no. Lunch isn't a period. But it is in
7 between -- it's first -- it's first period and second
8 period and then there is nutrition and there is third
9 and fourth and then there is lunch and after lunch it's
10 fifth and sixth period.
- 11 Q What is nutrition?
- 12 A It's just a 15-minute break from class so
13 students can go buy something to eat, such as breakfast
14 or something like that.
- 15 Q Do you have a bell that tells you how to get to
16 class?
- 17 A Yes.
- 18 Q Does everyone in school have the same schedule?
- 19 A Yes. Well, can you clarify that question?
- 20 Q Sure. Let me first ask this one, actually.
21 Are there any special programs at Crenshaw, like magnet
22 programs or remedial programs?
- 23 A Yes. I was in the teacher training magnet
24 program. And there is a regular magnet program.
25 There's an ESL program. And there's an ACE, ACE

- 1 Academy. And there's a Media Arts Academy.
- 2 Q Anything else?
- 3 A There's also the special ed classes.
- 4 Q Anything else?
- 5 A That's it.
- 6 Q Do any of those programs have a different
7 schedule than the regular school day?
- 8 A I think -- well, I'm not sure. Well, all the
9 classes -- all the programs, everybody gets out at the
10 same time. The reason why the programs were made is
11 because you get a special set of classes that prepare
12 you for whatever academy or program you're in. So if
13 you have like, for example, you have media -- if you're
14 in the Media Arts Academy, there is a period that you go
15 to the media arts class. You learn how to use
16 computers. You get a class in computer science or
17 something like that and you participate in field trips
18 after school and learn how to work with film and cinema
19 and everything like that.
- 20 Q What is the ACE Academy about?
- 21 A The ACE Academy is sort of like the same thing,
22 but you pick a career that you want to -- like a career
23 that you want to go into, and they try to work with you
24 with that and they give you extra credits that go
25 towards college. That's about it.

- 1 Q Do you know what ACE stands for?
- 2 A No.
- 3 Q What about the teacher training?
- 4 A Teacher training is to prepare you to become a
5 teacher for those students -- what they do is when you
6 become enrolled into the school -- I was just
7 automatically selected to go into the teacher training
8 program. I didn't select the teacher training magnet
9 program. But before when I was at Audubon I was in
10 regular magnet.
- 11 Q Do you know how you were selected to become or
12 put into the teacher training magnet?
- 13 A From what I understood they told me that
14 somebody recommended that I go into teacher training
15 magnet because they thought I might want to become a
16 teacher.
- 17 Q Do you know who recommended you?
- 18 A No.
- 19 Q Do you know if it was someone from your junior
20 high?
- 21 A No.
- 22 Q Do you know how students get placed in any of
23 the other special programs like the general magnet or
24 the ACE program?
- 25 A The ACE program, a teacher comes, a teacher

1 representative -- a teacher who is a representative of
 2 the ACE program, they come to your class and they ask
 3 who wants to fill out an application to get into the ACE
 4 program, and they tell you what they offer and
 5 everything like that. And they usually go into the
 6 health classes and ask the students because health is
 7 offered in the 9th grade. And I guess health is like
 8 the only class where they can do it because that is an
 9 elective class.

10 Q You took health in the 9th grade, right?

11 A Yes.

12 Q It's an elective?

13 A It's a required class, but the reason why they
 14 list it as an elective is because you can choose whether
 15 you want to take ECP first or health. So they list it
 16 as an elective class and a lot of students never did
 17 take the class. Sometimes they are skipped right up to
 18 another elective. And then when they get into the 10th
 19 grade year they take health or ECP. So you can choose
 20 when you want to take that class.

21 Q Health class?

22 A Yes. And ECP.

23 Q Do you know if all the students who want to
 24 attend the ACE Academy are able to?

25 A Yes.

1 Q Do you know about how many students are in it?

2 A No.

3 Q How about the Media Arts Academy, how do you
 4 get into that?

5 A I don't know.

6 MS. LHAMON: I think he said that they are
 7 magnets, not academies.

8 THE WITNESS: It's the ACE Academy and the
 9 Media Arts Academy, but the teacher training and the
 10 regular magnet, those are just advanced programs that
 11 you can get into. And the way they work is that it is a
 12 higher level, they give you higher level classes. And
 13 that's the reason for me having honors classes, because
 14 I have been in magnet during my high school year.

15 BY MS. VANSE:

16 Q Do you know how many students are in the
 17 teacher training magnet program?

18 A No.

19 Q Do you all take your classes together?

20 A What they do is they try to keep all the
 21 students together, but all the students could be in the
 22 same class and not the same period.

23 Q Is that the same for the general magnet, if you
 24 know?

25 A Yes.

1 Q Do you know how many students are in the
 2 general magnet program?

3 A No.

4 Q You said you don't know how students get into
 5 the Media Arts Academy?

6 A No.

7 Q If you wanted to know, do you know where you
 8 could find that out? Is there someone at school who
 9 knows how to get into a program if you are interested?

10 A The teacher in the media arts rooms.

11 Q Who is that?

12 A I don't know.

13 Q Do you know who the teacher is for the ACE
 14 Academy that comes to, like, the classes?

15 A No.

16 Q Do you know anyone in either of those
 17 academies?

18 A Yes.

19 Q About how many people do you know in the ACE
 20 Academy?

21 A One.

22 Q Is that just a friend of yours?

23 A Yes.

24 Q Is it a friend that you are involved with at
 25 the Community Coalition?

1 A Yes.

2 Q What is that person's name?

3 A I don't know his last name, but his first name
 4 is Daniel. D-a-n-i-e-l.

5 Q Did you ever talk to Daniel about the complaint
 6 or the conditions at your school?

7 A No.

8 Q About how many people do you know in the Media
 9 Arts Academy?

10 A None.

11 Q Did Daniel ever talk to you about the ACE
 12 Academy?

13 A Yes.

14 Q Did he tell you what it was like?

15 A Yes. He just told me that they go on a lot of
 16 trips to different colleges.

17 Q Anything else?

18 A That's it.

19 Q What colleges do they go to, do you know?

20 A No.

21 Q Do you know anyone in the general magnet
 22 program at Crenshaw?

23 A Yes. I know quite a few people.

24 Q About how many?

25 A Maybe about five. I can't think of the names

- 1 off the top of my head, though.
- 2 Q Were any of those people involved in the
3 Community Coalition?
- 4 A Yes.
- 5 Q How many?
- 6 A Two.
- 7 Q With those two did you talk to them about the
8 complaint or the conditions at your school?
- 9 A No. when you say "complaint or conditions," do
10 you mean did I talk to them about the lawsuit or --
- 11 Q Let me break that up. For the two students
12 that you know that are in the magnet program at
13 Crenshaw, did you ever talk to them about this lawsuit?
- 14 A No.
- 15 Q For the same two students did you ever talk to
16 them about complaints or the conditions at Crenshaw?
- 17 A Yes. Because we all participate in the
18 Community Coalition, we all participate in the same
19 discussions, and the same protests, everything. So they
20 are aware of the conditions and they attended Crenshaw
21 with me so they both know -- they all know about the
22 conditions.
- 23 Q Do you know if they were ever approached by the
24 ACLU to join in the lawsuit?
- 25 A No.

- 1 Q No, they weren't, or you don't know?
- 2 A No, I don't know.
- 3 Q What time did school start at Crenshaw?
- 4 A At Crenshaw the first bell rings at 7:50, and
5 that's the warning bell to let all the students know
6 that school is about to begin, and then the tardy bell
7 rings at 8:00 o'clock.
- 8 Q And the tardy bell is when you have to be in
9 class?
- 10 A Yes.
- 11 Q Were all the class periods the same amount of
12 time?
- 13 A Yes.
- 14 Q How long?
- 15 A Fifty-four minutes unless we have a special
16 schedule or we get out of school early.
- 17 Q When would you have a special schedule?
- 18 A Only like if we had some kind of special
19 presentation in the NPR room, they will modify the
20 schedule to fit the presentation. And that was only
21 maybe about once a month. And then we had a minimum day
22 Fridays, which means we either got out -- the minimum
23 day means that we get out of school at 12:20. If we had
24 a shortened day, we get out of school at 2:00 o'clock.
- 25 Q When did you get out of school on the normal

- 1 day?
- 2 A The normal day -- on a normal day we get out at
3 3:10. Yeah, 3:10.
- 4 Q Then the minimum days was 12:00 -- I'm sorry.
5 What was --
- 6 A The minimum days we get out at 12:20.
- 7 Q How often did you have those?
- 8 A We had those maybe about once every three
9 months.
- 10 Q Do you know why?
- 11 A Most of the time because the teachers had a
12 faculty meeting or a lot of teachers have to go to a
13 meeting outside of the school where they all need to be
14 together or be at the meeting at the same time.
- 15 Q What about the shortened day?
- 16 A The shortened day we got out at 2:00 o'clock
17 and that was for meetings that were going to take place
18 in the library for teachers where they get together
19 their teaching plan and they talk about what they are
20 going to teach. Because all of the teachers taught the
21 same -- they taught the same thing in all the classes
22 for every subject. And, like, if you go to any English
23 class, most of the time you will find that the students
24 are reading the same book or discussing the same thing
25 in class.

- 1 Q Would this be all of the English classes or all
2 of the English classes in the magnet program?
- 3 A Most of the times it was all the English
4 classes in the magnet program.
- 5 Q Do you know if the teachers -- like these
6 teacher meetings that would happen on the shortened
7 days, do you know if the teachers from the different
8 subgroups, like the teacher-training teachers, got
9 together and then the regular education teacher got
10 together?
- 11 A I don't know how they got together.
- 12 Q How often did you have the shortened days?
- 13 A We had the shortened days -- in the first
14 semester it would start off to be every Friday, except
15 for like the first two weeks of school, because that is
16 the time when all the students were trying to get their
17 schedule together and everybody will make sure that they
18 are in the right classes. So the first two weeks we
19 didn't have the shortened days, but after the first two
20 weeks were over we had them every Friday.
- 21 Q This was the first semester of your 9th grade
22 year?
- 23 A Well, my 9th grade year and my 10th grade year.
- 24 Q Do you know if every Friday the teachers had
25 their meeting?

- 1 A Yes.
 2 Q How do you know that?
 3 A Because they would announce it over the PA
 4 saying that -- they would give a teacher reminder over
 5 the PA stating that there would be a planning meeting --
 6 I forgot what they called the meetings, but it was some
 7 kind of planning meeting after school, and they would
 8 say at 2:30 or at 1:00 o'clock. They would give like a
 9 time.
 10 Q Do you know if all the teachers went to these
 11 meetings?
 12 A No.
 13 Q Did you ever see any teachers leave instead of
 14 go to the meetings like as you were leaving school?
 15 A No.
 16 Q What about the second semester, did you have
 17 shortened days also?
 18 A The second semester it was the same way. We
 19 got out of school on a shortened day schedule every
 20 Friday.
 21 Q Every Friday the teachers had a meeting?
 22 A Yes.
 23 I want to take a break real quick.
 24 MS. VANSE: Sure. That's fine.
 25 (Recess from 11:54 a.m. to 12:05 p.m.)

- 1 BY MS. VANSE:
 2 Q At Crenshaw, how did you get assigned classes?
 3 A Well, what they do is they first -- there's a
 4 set of required classes to graduate. And those are your
 5 basic classes like English, science or biology. Because
 6 you take science in the 9th grade and then biology comes
 7 in the 10th. You have to take a math. So that is
 8 algebra. And you have to take history for your first
 9 two years. So that is going to be -- well, you have to
 10 take history for your -- from your 10th grade year on
 11 up. So that is why I have world history for the 10th
 12 grade.
 13 And that's when they decide -- that is when you
 14 can select what classes you want to take to fill in
 15 those other two spaces or how many spaces are left. And
 16 PE is a required class, but because I chose to be in
 17 leadership, they took out my PE class because that is
 18 what they usually do for students who want to take PE
 19 later on and want to become a leadership student during
 20 the time you are in school. You also get to choose an
 21 elective. And that's it.
 22 So it's the basic four classes, then it's the
 23 option of either PE or leadership. Or some students
 24 take ROTC. Because ROTC can replace PE but leadership
 25 doesn't. So it's the basic four and then it's the

- 1 option to take PE and then your elective.
 2 Q Do you know if those -- the basic four are
 3 requirements for every year at Crenshaw or just the
 4 years that you were there?
 5 A English was required for every year. You have
 6 to take four years of English. The reason why they have
 7 it set up that way is because they set it up based on
 8 the UC system, and those are the required classes that
 9 you need to take in order to go on to the UC college or
 10 university.
 11 Q How do you know that?
 12 A Because they talked to us about it every now
 13 and then, or if you ask your counselor about it that is
 14 what they will tell you. And since I've been at
 15 Washington I've talked to my counselor about it and she
 16 already has my schedule set up to where I can go to a UC
 17 college or university after I get out of high school.
 18 Q So who talked to you about the core classes at
 19 Crenshaw?
 20 A No one did. When I first entered into Crenshaw
 21 that was my schedule automatically. It was the basic
 22 four, then it was PE, and then it was ECP. And when I
 23 did ask how -- well, I never did ask really. When you
 24 talk -- when you go to your homeroom they give you like
 25 this introduction into high school. And they also have

- 1 orientations before you even enter into high school.
 2 While you are in middle school you go to an orientation
 3 and they tell you what to expect in high school and
 4 stuff like that.
 5 Q Do you know who talked to you before you went
 6 to high school?
 7 A Before I got to high school my mom did talk to
 8 me because she knew about the basic classes I needed to
 9 take. And my middle school teacher -- one of my middle
 10 school teachers in my 8th grade year talked to me about
 11 it.
 12 Q Did someone from Crenshaw come -- you said
 13 there was like an orientation program?
 14 A Yeah. But I didn't go to the orientation.
 15 Q Why not?
 16 A Because I never did hear about it. I never
 17 heard about the orientation. And when they did have the
 18 orientation, I guess only some students knew about it.
 19 Only a few students knew about it.
 20 Q Do you know how those students found out about
 21 it?
 22 A No.
 23 Q When did you find out that there had been an
 24 orientation program?
 25 A When the other students told me that they had

1 an orientation and they asked me if I went or not and I
2 told them no.

3 Q Was this when you were in junior high or high
4 school?

5 A Yes, junior high.

6 Q Do you know if students who went to the
7 orientation were given anything like a handbook or --

8 A They were given handouts as like a map of the
9 school, the basic classes that you need to take when you
10 first enter into 9th grade, the A through G
11 requirements. And like the basic classes are put into
12 the A through G requirements.

13 Q Is that an all-in-one book or are they a lot
14 of --

15 A They put them in a folder or sometimes like an
16 envelope.

17 Q Did the students put them in the folder, do you
18 know, or did the school?

19 A They are prepared previously before the
20 students get there. It is like a packet.

21 Q Did you ever receive that?

22 A No.

23 Q Did you ever ask for it?

24 A Wait. I want to go back. I did receive it but
25 it was after I entered into Crenshaw. And I received it

1 Q You said you needed four years of English,
2 correct?

3 A Yes.

4 Q How many years or units did you need?

5 A Of science, currently two years of science, the
6 regular science, and then you take biology and then
7 there is chemistry. So that is three. And then the
8 fourth year you get to choose like psychology for a
9 class or another class, like an anatomy class.

10 Q Are four years required or can you just have
11 that, if you want it?

12 A I don't know. I think it's just three years
13 required and then the fourth one is optional. But for
14 the magnet program down there now at Washington it is
15 four years required.

16 Q At Crenshaw do you know what the magnet program
17 requirements were?

18 A No.

19 Q Were any of the requirements in your teacher
20 training magnet different than like a general student?

21 A Yes. While I was in the teacher training while
22 at Crenshaw we didn't receive credits for homeroom
23 because we didn't have a homeroom. Well, at Washington
24 all the students that I know, most of them that I know,
25 they are in chemistry right now. But all the students

1 in my homeroom class.

2 Q Do you know when that was?

3 A The first day of school.

4 Q Were the handouts the only way you found out
5 about the requirements at Crenshaw?

6 A I knew about them -- I kind of had an idea
7 about what the requirements were previously, because the
8 teachers in middle school, they will always talk about
9 it in homeroom or like teachers in your regular classes
10 during your 8th grade year, they will talk about it.

11 And then those same requirements for high school, they
12 are sort of like duplicated in middle school.

13 So for middle school you also have to take
14 English and -- take English, math -- some kind of math,
15 some kind of history. It is just like the four basic
16 classes are required in middle school, too, except for
17 you have an elective that you can choose off a list in
18 middle school and you can take any elective that you
19 want that is available.

20 Q In middle school did you receive handouts like
21 what you received in high school?

22 A Yes.

23 Q Was it kind of like in the same format, in an
24 envelope?

25 A Yes.

1 that I know at Crenshaw, they are in biology. So it is
2 like they are one class behind.

3 Q That is fine. To the extent that I'm asking
4 these questions, and maybe I should rephrase that
5 better, I'm just asking you about Crenshaw.

6 A At Crenshaw?

7 Q Right.

8 A So what is the question again?

9 Q At Crenshaw you had four years required for
10 English. Is that just for the magnet program or for all
11 students?

12 A That's for all students.

13 Q How many units or years of science were
14 required, any science?

15 A I don't know.

16 Q Do you know how many were required for you at
17 Crenshaw if you had stayed there?

18 A Three.

19 Q Were there any particular science classes you
20 had to take?

21 A You had to take the regular science in the 9th
22 grade and then you had to take biology and you had to
23 take chemistry. All the requirements for the classes
24 are all the same for all students, except I don't know
25 what the regular school offers to the students who are

1 wondering about what class to take, but I know that the
2 magnet program every year or every semester -- well,
3 every year they plan your schedule based on the classes
4 that you need. And then they ask you: "You have two
5 spaces open so what elective do you want to take?"

6 Q For the science requirements, do you know if
7 you wanted to take, say, physics instead of biology or
8 chemistry, could you do that instead?

9 A Well, some students -- well, I don't know.

10 Q How many requirements -- years or units do you
11 need for math at Crenshaw?

12 A You need -- it depends, because I know you have
13 to go up to at least trigonometry. And some students
14 are ahead so they might end their math year earlier than
15 some students.

16 Q Every student at Crenshaw had to take up to
17 trigonometry?

18 A Yes.

19 Q Do you know how many different types of math
20 classes there were at Crenshaw?

21 A There was Algebra 1. And then you would take
22 geometry. Then you would take Algebra 2 and then you
23 would take trigonometry.

24 Q And this was for all students?

25 A Yes.

1 and it says three recommended.

2 Q What are the A through G requirements?

3 A The A through G requirements, it is a set of
4 classes that are required in order to get into a UC or
5 university. And it is like a layout of all the classes
6 that you need in order to graduate and in order to get
7 into college.

8 Q And that is part of what you received in the
9 packet?

10 A Yes.

11 Q Is that something you received every year?

12 A Yes.

13 Q At the beginning?

14 A Yes.

15 Q Were there any other handbooks that talked
16 about requirements, class requirements at Crenshaw?

17 A You will get a planner. There is a book called
18 an "Agenda" and you can write down your homework
19 assignments in the book. It is like a planner. It has
20 like a day -- it's just like an organizer. But at the
21 beginning it tells you the school policy and the rules
22 and regulations. And then it goes through the A through
23 G requirements. And it has a chart and it has -- it is
24 like a question on top of the chart: What class do you
25 take for such-and-such a year? And you have to kind of

1 Q How many years of history were required at
2 Crenshaw?

3 A At Crenshaw you have to take world history --
4 wait. The 9th grade year you didn't have history at all
5 because ECP and health take the place of that. But in
6 the 10th grade year you would take world history;
7 11th grade year you would take U.S. history. And in
8 the 12th grade year you would take either economics or
9 statistics, but I don't know if they offer statistics
10 or -- I don't know if they offer statistics at Crenshaw.

11 Q Do they offer economics at Crenshaw?

12 A Yes.

13 Q Do all 10th graders like take the same history
14 class or do some 10th graders take American history
15 first, do you know?

16 A It is required to take world history first.

17 Q And that is for all of the students?

18 A Yes.

19 Q How many units of PE were you required at
20 Crenshaw?

21 A Two. Two years of PE

22 Q What about any foreign language, were those
23 required?

24 A Yes. On the A through G requirements it says
25 that you have to take two years of a foreign language

1 follow that chart. And that way when you get ready to
2 graduate or when you are in the 12th grade year or your
3 11th grade year, you can go to your counselor and say "I
4 took this class" and you can also write down in the book
5 what grade you received in that class and just to make
6 sure that the counselor knows that you did pass that
7 class. But it is up to the students to keep track of
8 it. It is not mandatory to keep track of it.

9 Q It is not mandatory for the school to keep
10 track of it?

11 A It is not mandatory for the students to keep
12 track of it. But the teachers can give you a copy of
13 your transcripts and you will know what class that you
14 had beforehand. And that is another thing that they
15 give you at the beginning of the school year is the
16 planner.

17 Q And you receive that every year?

18 A Yes.

19 Q Anything else?

20 A That's it.

21 Q Do you talk with or did you ever talk with a
22 counselor about your schedule at Crenshaw?

23 A Yes.

24 Q How many times?

25 A Maybe about twice.

- 1 Q Twice in your freshman year?
 2 A Twice since the whole time being at Crenshaw,
 3 my 9th and my 10th grade year.
 4 Q So was it once in your 9th grade year and once
 5 in your 10th grade year?
 6 A Yes.
 7 Q Can you tell me when this was?
 8 A I can't remember what time. I know my 10th
 9 grade year it was the middle of the first semester.
 10 Q Do you remember if it was the first or second
 11 semester with your 9th grade year?
 12 A No.
 13 Q Is that something that you set up yourself or
 14 that you had to go to?
 15 A I set it up myself.
 16 Q Both times?
 17 A Yes.
 18 Q What did you talk about with your counselor the
 19 first time, about your schedule, your school schedule?
 20 A I just asked her about what electives -- I
 21 wanted to take -- I asked her about the electives I
 22 wanted to take. I asked her about taking health after
 23 ECP because I wasn't sure what class to take after I got
 24 out of ECP. So she told me I could take health.
 25 Q Did you talk to her about anything else?

- 1 A No.
 2 Q Did you talk to her about your math class?
 3 A Yes.
 4 Q What did you talk about?
 5 A I asked her how do I transfer into an algebra
 6 class for the second semester of my 9th grade year.
 7 Q What did she say?
 8 A She said that there wasn't enough room for a
 9 lot of students in the algebra class so there was a
 10 chance that I might not be able to get into it.
 11 Q When you were given your schedule for your 9th
 12 grade year at Crenshaw, did it have your classes for
 13 both semesters?
 14 A No.
 15 Q So when did you know that you were not going to
 16 be in an algebra class?
 17 A I didn't know until the beginning of the second
 18 semester, because when they found out that there wasn't
 19 enough room in the algebra classes they came into our
 20 algebra class and told us that only a few students were
 21 able to go into the algebra class. And during that time
 22 Ms. Silverstein and Ms. Lyons came in to talk to us
 23 because that was during the time that Ms. Lyons was
 24 transferred -- not transferred -- to become a counselor,
 25 but she was no longer a teacher so they changed her into

- 1 a counselor.
 2 So Ms. Silverstein and Ms. Lyons came in to
 3 talk to us and they told everyone in the class that
 4 there wasn't enough room in the algebra classes. And so
 5 some of us had to stay in there and they were going to
 6 retile the class, and the only people who were going to
 7 be out of the class was the people who had an A in the
 8 class and there was only about two or three students.
 9 And they said everyone else had to stay because they
 10 didn't have enough room in the class.
 11 Q Was it after Ms. Lyons and -- was it another
 12 teacher that came in?
 13 A No. It was just Ms. Lyons and Ms. Silverstein
 14 who was my teacher and magnet counselor.
 15 Q Was it after they came into your algebra class
 16 that you went and talked to your guidance counselor
 17 about your schedule?
 18 A Yes.
 19 Q Other than talking about how there wasn't going
 20 to be enough room, did your guidance counselor say
 21 anything else about the guidance class?
 22 A No.
 23 Q Did she offer you any other suggestions about
 24 math or what else you could do?
 25 A No.

- 1 Q Did you talk to anyone else?
 2 A No.
 3 Q Did you ever -- did your mom ever come in and
 4 talk to your counselor about getting you into algebra?
 5 A Yes. That's the time when she came in to talk
 6 to Mr. Kiel about Ms. Williams.
 7 Q So she talked about -- go ahead. I'm sorry.
 8 A And she tried to get me out of the class. That
 9 was one of the reasons why she went and talked to the
 10 principal.
 11 Q So she talked to Mr. Kiel about Ms. Williams
 12 being late and also about getting you into algebra?
 13 A To take me out of that class to get me into
 14 algebra.
 15 Q Do you know how many algebra classes there
 16 were --
 17 A No.
 18 Q -- in your 9th grade year?
 19 Was your brother in algebra at the same time?
 20 A During what time?
 21 Q I'm sorry. During your first semester of your
 22 freshman year.
 23 A Yes.
 24 Q Were you both in the same class?
 25 A Yes.

- 1 Q Did you know anyone else in algebra that wasn't
2 in your class?
3 A Yes.
4 Q What class were they in?
5 A They were in algebra, but they were in a
6 different classroom.
7 Q Do you know what the teacher's name was?
8 A No.
9 Q How many people did you know that weren't in
10 your algebra class but were in a different one?
11 A Maybe about five, ten people. Because in the
12 9th grade almost everybody has algebra. But during the
13 time when they are trying to get ready for the second
14 semester, I don't know if teachers left or what
15 happened, because a lot of students couldn't go into
16 their second semester of algebra so they had to take
17 some students out of those classes and put them in
18 different classes.
19 Q Was math investigations a new class?
20 A Yes.
21 Q And it just started in your second semester of
22 your freshman year?
23 A Yes.
24 Q Do you remember what kind of math you were
25 taught in math investigations?

- 1 A In math investigations we were taught algebra.
2 It was the same topic and everything, but it was just
3 that the class was retitled. The way it was explained
4 to us by the counselor is that the class was going to be
5 retitled because they didn't have enough algebra
6 classes.
7 Q Do you know why they would retitle it if it was
8 the same subject matter?
9 A No.
10 Q Were you learning the same kind of things in
11 math investigations that you learned in algebra?
12 A Yes.
13 Q Why did you want to transfer out of math
14 investigations into algebra?
15 A Because I was told that since I had math
16 investigations I would have to -- when I get into my
17 10th grade year I would have to take algebra again.
18 Q Who told you that?
19 A [REDACTED] told me that and my counselor,
20 Ms. Silverstein.
21 Q Did they give you an explanation?
22 A They told me because I didn't make an A in the
23 class the first time, I didn't make an A in the
24 algebra -- before they taught the class, because I
25 didn't make an A, that was the reason why I was put into

- 1 math investigations. And the reason why I had to take
2 algebra again, because usually algebra takes a full year
3 and then they couldn't divide it into a second semester
4 and then a first semester. It has to be consistent with
5 first semester, then second semester.
6 MS. VANSE: I think it's close enough to 12:30,
7 I'm just going to stop here.
8 (Lunch recess taken from 12:29 p.m. to
9 2:04 p.m.)
10 (Mr. Eliasberg left the proceedings.)
11 BY MS. VANSE:
12 Q I would like to remind you that you are still
13 under oath. Have you had anything over lunch to drink
14 or anything you took that would interfere with your
15 ability to understand or respond?
16 A No.
17 Q I think before we left we were talking about
18 your math investigations class?
19 A Yes.
20 Q What grade did you get in your algebra class
21 your first semester of your freshman year?
22 A [REDACTED]
23 Q What did you get in math investigations?
24 A [REDACTED]
25 Q You said only students in algebra who had an A

- 1 were able to stay in algebra the second semester?
2 A Yes.
3 Q How do you know that?
4 A Because when I asked my counselor -- that is
5 what she told me when they came and talked to the
6 students. Ms. Lyons, my counselor, and that is what
7 they said, what they told the students.
8 Q Did you know any students who were able to go
9 on with algebra the second semester?
10 A Yes.
11 Q How many students did you know?
12 A Two.
13 Q Do you know what they got in algebra that first
14 semester?
15 A Yes.
16 Q What did they get?
17 A An A.
18 Q Anybody else besides those two students?
19 A No.
20 Q You then took algebra your first semester
21 sophomore year, right?
22 A Yes.
23 Q What did you get in algebra that first
24 semester?
25 A [REDACTED]

1 Q Did you like algebra better the second time you
2 took it?

3 A The second time I took it?

4 Q Right. In your sophomore year.

5 A The second time in my sophomore year, not
6 really, no.

7 Q What didn't you like about it?

8 A Because we were going over the same thing I
9 learned in my first semester -- because I just
10 transferred to a new school, it's the same topic, but
11 it's taught in a different method so it's like I'm
12 starting all over again.

13 Q Was this in your 9th grade year?

14 A No. I'm talking for my 10th grade year.

15 Q So your first semester of your 10th grade year
16 you took algebra again?

17 A Yes.

18 MS. LHAMON: I think that mischaracterizes his
19 testimony, the "again" part.

20 BY MS. VANSE:

21 Q You took algebra in your 9th grade year?

22 A Yes.

23 Q For one whole semester. When you took algebra
24 in your 10th grade year, was it the exact same class?

25 A No.

1 difference or you had kind of an understanding from
2 taking it before?

3 A I think it was because the teacher was there
4 and she spent more time going over the topics and she --
5 well, she took the time. Like the whole thing was that
6 she was there. Because the hard part about it in the
7 9th grade, my first semester in the 9th grade, was that
8 the teacher wasn't -- she would show up but it was like
9 she wasn't there. She was there every now and then. It
10 was just like we were basically wasting our time in the
11 class.

12 Q Do you think you would have been ready to take
13 algebra your second semester freshman year?

14 A Yes.

15 Q Why do you think that?

16 A Because maybe if I had another teacher, because
17 the way they explained it, was that the students who did
18 pass, they had to take them out of that class, so I
19 thought maybe if I had a different teacher I could be
20 better.

21 Q But with the teacher that you did have in the
22 9th grade, do you think that you were ready to take
23 algebra in your second semester?

24 A No.

25 Q Do you think that math investigations helped

1 Q What was different about it?

2 A It was a different teacher and it was the
3 same -- we learned the same thing that I learned the
4 first semester, the first semester -- it's the same
5 thing that I learned the first semester in my 9th grade
6 year. Everything was the same except for it was a
7 different teacher.

8 Q Did you learn more --

9 A Yes.

10 Q -- in your 10th grade year?

11 A Yes.

12 Q Why do you think you learned more?

13 A We went through more different topics of
14 algebra, learned different methods of problem solving.
15 We didn't have -- I mean the teacher was there all the
16 time. It was maybe only once or twice when she was
17 absent.

18 Q This was Ms. Mims?

19 A For --

20 Q For your 10th grade algebra.

21 A For my 10th grade algebra it was Ms. Palomino.

22 Q What do you think made the biggest difference
23 taking algebra in your 10th grade year?

24 A The biggest differences in what?

25 Q Do you think it was the teacher that made the

1 you become ready to take algebra?

2 A No.

3 Q Why not?

4 A Because it was the same thing that the other
5 students were learning. And if I would have been
6 transferred out of that class, I would have learned the
7 same things, but it would have just been a different
8 teacher and the teacher would have been there so we
9 would have more time to actually learn something.

10 Q You said that what you learned in math
11 investigations was the same thing other students were
12 learning?

13 A Yes.

14 Q What other students?

15 A The students who transferred out of the class
16 to take algebra in the second semester.

17 Q Besides the name, what do you think was
18 different about math investigations as opposed to
19 algebra?

20 A There was nothing really different that I
21 really saw. Because when -- like on the topics that we
22 learned, I would ask another student what they were
23 learning and they would tell me they were learning the
24 same thing in their regular algebra class.

25 Q And these were the students that you knew that

1 had gone on to algebra?
 2 A Yes.
 3 Q Did you ever look at their homework to see what
 4 they were learning in algebra?
 5 A Yes.
 6 Q Was it the same that you were learning?
 7 A Yes.
 8 Q Do you know if Crenshaw still has the math
 9 investigations class?
 10 A No.
 11 Q You don't know?
 12 A No.
 13 MS. VANSE: I'm now going to mark this. I
 14 think it's Exhibit 2. This is your report card that
 15 your attorney brought today.
 16 (Defendant's Exhibit 2 marked for
 17 identification by the court reporter.)
 18 BY MS. VANSE:
 19 Q This is your report card?
 20 A Yes.
 21 Q This is for your first semester of your 10th
 22 grade year?
 23 A No. This is for my second semester of my 10th
 24 grade year when I transferred into Washington.
 25 Q So this is your grades from January until March

1 MS. VANSE: I would like to put on the record I
 2 believe that is pertinent to what we requested and we
 3 would like a copy.
 4 MS. LHAMON: I would too. It is not in our
 5 possession so we cannot produce it to you.
 6 BY MS. VANSE:
 7 Q Who do you think were the best teachers you had
 8 at Crenshaw?
 9 A At Crenshaw some of my best teachers were my
 10 English teacher, my algebra teacher, my biology teacher,
 11 my Spanish teacher -- no, not my Spanish teacher. And
 12 my leadership teacher.
 13 Q For your algebra teacher was this algebra in
 14 your 10th grade year?
 15 A Yes.
 16 Do you want the teachers in my 9th grade, too?
 17 Q Yes. That would be great.
 18 A My English teacher from my 9th grade year. My
 19 PE teacher from my 9th grade year. Who else? My
 20 Spanish teacher from my 9th grade year. My health
 21 teacher from my 9th grade year. And that's it.
 22 Q Why did you like -- let's start with your
 23 Spanish teacher. It was Mr. Diaz?
 24 A Yes.
 25 Q Why did you like him?

1 when you transferred?
 2 A This is my grades from March until now.
 3 Q March of what year?
 4 A This year. I transferred from Crenshaw into
 5 Washington in March.
 6 Q I see. This is your Washington math class?
 7 A Yes.
 8 Q I think I may have asked you this before: Do
 9 you have your report cards from when you were at
 10 Crenshaw?
 11 MS. LHAMON: Asked and answered.
 12 THE WITNESS: I have my grade card. I don't
 13 have a report card because when I transferred out of
 14 Crenshaw they give you a grade card and it is your final
 15 grade for that school. And I have -- that is on file in
 16 the school.
 17 BY MS. VANSE:
 18 Q At which school?
 19 A At Washington.
 20 Q Do you have a copy?
 21 A No.
 22 MS. VANSE: Counsel, do you know if that has
 23 been produced or is going to be?
 24 MS. LHAMON: I have no idea. I do not have a
 25 copy and I have not seen a copy.

1 A Because the whole period was instruction time.
 2 There was never a time where we would begin late or end
 3 early. And the whole time -- he would give us work like
 4 every day. Every day we had work.
 5 Q Anything else?
 6 A And what he did was because it was a Spanish
 7 class he would tie it into the culture and have us do
 8 different assignments where we researched different
 9 cultures, different Mexican cultures. And he told us
 10 about what it was like when he was living in Mexico.
 11 Just try to kind of tie in everything together.
 12 Q Did you ever talk to him after class about
 13 assignments?
 14 A Sometimes I would talk to him if I didn't
 15 understand one of the assignments and he would explain
 16 it to me. And then he'll also tell me I can come after
 17 school.
 18 Q What about your 9th grade English teacher, what
 19 did you like about her?
 20 A She came from England so what she did was she
 21 compared English -- the English language to how she
 22 spoke when she was in England. And she was also --
 23 let's see. What else did she -- she was from somewhere
 24 else. I can't remember where she was from, but she --
 25 it was somewhere where they didn't even speak English

1 and she would compare the words. What we would do is we
2 would read books like "Romeo and Juliet" and she would
3 compare it to real life situations, something that can
4 happen today and compare it to the story, and then show
5 us how everything is one and the same. Or how somebody
6 can use, kind of change up the language to make it seem
7 like it is really telling one story but it is actually
8 telling another.

9 Q Anything else that you liked about her?

10 A That's it. She also let me, like, write a lot.
11 She always let me use my own creative writing skills and
12 she never would say that is wrong. She always told me
13 that I can write whatever I want to write because it's
14 me. She let me write about, like write for the person
15 that I am.

16 Q Do you know if that English class was like a
17 writing class or a literature class?

18 A No. It's English. It all falls under English,
19 literature, everything. All the topics fall into
20 English.

21 Q What did you like about your 9th grade PE
22 teacher?

23 A What happened was like when I first joined the
24 Explorers program they required you to be physically
25 fit. And a lot of times what she did was she will have

1 like the students just -- she would just say "Go play
2 basketball" or something -- not just say go play
3 basketball, but while she is teaching how to play
4 basketball I will ask her, like, "Can I go on the track
5 and run?" And she will be like, "Well, if you show me
6 that you know how to shoot or something like that, then
7 I will let you go run on the track."

8 A lot of times she will let me run on the
9 track. She will let me put in my own suggestions as to
10 how to make the PE class better or different things we
11 can do.

12 Q Did she do that with other students also?

13 A Yes.

14 Q I think health, health was the last teacher
15 that you liked in your 9th grade year?

16 A Yes.

17 Q What did you like about him?

18 A The reason why I liked him is because he used
19 to play football. What he did was, he didn't just go
20 buy the book. He didn't just hand us the book and say
21 "Do the assignment on the page." He will actually sit
22 down and explain why different things in health take
23 place and stuff like that.

24 Q Anything else you liked about him?

25 A That's it.

1 Q Any other teachers that you think of from your
2 9th grade year that you liked? I have Spanish, English,
3 PE, and health.

4 A That's it.

5 Q What about your algebra teacher your 10th grade
6 year, what did you like about her?

7 A She was a new teacher and she was like real --
8 really, like I guess you could say straight up with
9 everything. What she did was instead of just teaching
10 us the math, she will make like different -- like in
11 order to solve a problem, she will have like these
12 formats that we use. It was like an outline of how to
13 solve a problem. She made this one called a "Kissie"
14 format. I really liked it because it made it easier for
15 me to actually solve the problem because all you've got
16 to do is go down the steps. The way she did it was she
17 made like these rhymes and all kinds of stuff to make
18 you remember. It sounds funny, but it really helped.
19 It really helped a lot.

20 Q Anything else you liked about her?

21 A She was always interested in like what I was
22 doing. She like once a month she always brought in a
23 college counselor from another college. She brought in
24 someone from USC. She brought in someone from UC Santa
25 Barbara. She brought in somebody from UCLA. This was

1 like every month. Once a month she will bring somebody
2 from a college. And she will ask the college -- whoever
3 is from the college, the student or whatever, she always
4 asks them, well -- she will always ask them stuff like
5 what types of math do you need to take in order to get
6 high-level classes in college. And she helped us decide
7 on what career that we wanted to get into.

8 Q Would this be during the math class?

9 A Yes. It was only once a month so it never
10 really took any time away from the instructional time.

11 Q Would the students she would bring in, would
12 they talk about college or math in particular?

13 A They would talk about math. And a lot of times
14 she would tell us something like, "You know what, last
15 month I explained to you guys something and at one time
16 I didn't understand it and I wanted the college student
17 or the college professor," whoever she brought in, "to
18 clarify it for me so they could show you how they learn
19 it in college" or something like that.

20 Q What about your Spanish teacher, what did you
21 like about her?

22 A In my --

23 Q In your 10th grade.

24 A I didn't list my Spanish teacher.

25 Q You had algebra, leadership. What was the

1 other one?

2 A Biology.

3 Q How about your biology teacher, what did you
4 like about her?

5 A The reason I liked my biology teacher, even
6 though we didn't have a lot of resources she always
7 tried to make sure that we still learned. Because a lot
8 of times she will tell us, well, we don't have
9 laboratory materials or anything, but she will make sure
10 that we still learn. She will even try to go out of her
11 way to make sure she will get the materials.

12 Like just recently she -- four years ago she
13 ordered some science materials and she just got them
14 like right before I left. And so she was all upset and
15 she was like -- and I told her -- she was like -- she
16 said that we were supposed to learn that topic using
17 those science materials before. And she said it's too
18 late because she is just now getting the materials. She
19 was showing me like what -- how to use it, how to use
20 the materials and everything. I told her we still
21 learned it even though we didn't have the materials. So
22 even though we didn't have the materials, we still
23 learned regardless.

24 Q Do you remember what kind of materials those
25 were that she ordered?

1 janitor came in and threw away all of our assignments.

2 And the reason for that is because she asked the room to
3 be cleaned up, but the janitor threw away all of our
4 assignments so she had to go look for them.

5 And the reason why the janitor was throwing
6 away everything was because they were making room for
7 new material that was coming in. And Ms. Coreley when
8 she got the materials she was just going off and
9 everybody -- everybody always asks the teachers "What's
10 wrong?" if they look bad or whatever.

11 And she was like "I ordered materials four
12 years ago." And she said that she had just got them.
13 And she said -- and she kept telling us over and over
14 she said she's been ordering materials with her own
15 money and she is just now getting the materials and she
16 could have saved her money. Because she was upset that
17 day.

18 Q Do you remember what day that was or what time
19 of year?

20 A It was about three weeks before I transferred
21 out of Crenshaw.

22 Q Did she say why she hadn't received them before
23 then?

24 A No.

25 Q Did you ask her?

1 A She ordered just basic science tools, like test
2 tubes, petrie dish, slides, glasses, microscopes, just
3 basic stuff.

4 Q Were any of those things in the classrooms
5 before?

6 A We had a few microscopes, but some of them
7 weren't working. We only could use -- like only a few
8 students could actually do the laboratory assignment at
9 a time, but we all had the chance to, you know, try to
10 test it out, test out any ideas that were listed in the
11 book and use a scientific method.

12 Q Did you all have a chance during class or did
13 you have to come after class?

14 A During class. And she would stay after class,
15 too, to help out some the students that needed help.

16 Q Did you ever stay after class to talk with her
17 or get some help?

18 A No.

19 Q You said she ordered materials four years ago?

20 A Yes.

21 Q How do you know that?

22 A Because she told me. What happened was she had
23 some boxes -- some boxes came into the room one day and
24 what she did was she took everything out of the room
25 because -- and she told this to the whole class -- a

1 A No.

2 Q Do you know if she had purchased other supplies
3 with her own money before that?

4 A She told us that she purchased some extra books
5 with her own money.

6 Q Do you know what kind of books?

7 A It was biology books.

8 Q Were they textbooks or were they supplemental?

9 A Textbooks, yes.

10 Q Do you know if she was ever reimbursed for
11 those?

12 A No.

13 Q No, you don't know or --

14 A I don't know.

15 Q Anything else that she said she purchased?

16 A She said she purchased some slides for the
17 microscopes.

18 Q Anything else?

19 A That's all I know of.

20 Q Other than what you've just told me, is there
21 anything else that you liked about your biology teacher?

22 A That's it.

23 Q What about your leadership teacher, what did
24 you like about him?

25 A He made sure that when the school said they

1 needed something or when we were planning an event, he
2 made sure it was organized. Because we had student body
3 officers, a lot of times he would just, you know, kind
4 of like sit back. He would just -- he will let the
5 students actually govern, you know, the school by
6 themselves instead of saying "Well, because I'm the
7 leadership teacher that means I have to take control of
8 the class." He actually let the student body president,
9 the vice president, and all the officers, you know, take
10 control of the class like it is supposed to be run. And
11 a lot of times with our events he never did take credit
12 for it.

13 Q Did he teach anything other than leadership?

14 A He taught math. He taught I think
15 trigonometry. No, math analysis.

16 Q Anything else?

17 A That's it. That's all I know.

18 Q What subjects did you get your best grades in
19 in the 9th grade?

20 A In the 9th grade it was English. [REDACTED]
21 [REDACTED]
22 [REDACTED]

23 Q [REDACTED]

24 A [REDACTED]

25 Q [REDACTED]

1 after they ask the teachers, you know, about your
2 characteristics and personality and everything like
3 that.

4 Q Were you involved in anything else at school
5 besides the leadership kind of student government?

6 A I was involved in the Peer Mediation Team
7 there. I was involved with the Black Student Union. I
8 worked with them a little bit. What else was I involved
9 in? That is all I can think of right now.

10 Q Did you ever receive any awards when you were
11 at Crenshaw, make the honor roll or anything?

12 A Yes.

13 Q What were those?

14 A I made the honor roll and received recognition
15 for the Stanford 9 test scores.

16 Q When did you make the honor roll?

17 A I made the honor roll I think it was back in
18 February.

19 Q Was it your 10th grade year or 9th grade year?

20 A 10th grade year. Yes, 10th grade year.

21 Q Was that for the semester previously, like you
22 were on honor roll for what you had done for your first
23 semester, 10th grade?

24 A Yes. It was for the first semester of my 10th
25 grade year and it was for like the five- and the

1 A [REDACTED]

2 Q Do you think that you are a good student?

3 A Yes.

4 Q Why?

5 A Because I'm determined to do whatever it is to,
6 you know, graduate and at the same time participate in
7 other activities. And I can -- I'm like organized to do
8 a lot of things at once.

9 Q At Crenshaw did you have -- were you elected to
10 the student body, I think, to get into your leadership
11 class?

12 A Yes. They go through a selection process based
13 on your grades. And they talk to the teachers -- they
14 actually call the teachers in and ask them about the
15 student and ask if they should be in leadership or not.
16 They interview -- not interview, but I guess they kind
17 of talk to some of the teachers, the teachers that I
18 didn't get the recommendations from, and they found
19 that, you know, based on the teachers' comments that is
20 how I was selected. But I know there is an interview
21 process and they talk to the teachers.

22 Q Then you had to run for the office also?

23 A I ran for -- what did I run for? I can't
24 remember what I ran for. But even if you don't win any
25 election, you are still elected to be on leadership

1 ten-week quarter but the second semester.

2 Q Could you explain that. How do you get on the
3 honor roll at Crenshaw?

4 A They look at your grades. You have to have at
5 least a 3.5 grade point average. And I received a 3.6.
6 Yeah, 3.6. And they -- what else do they look at?

7 Q Just a minute. Was the 3.6 for the fall --
8 your 10th grade fall semester?

9 A It was my 10th grade first semester and five to
10 ten -- it was for my 10th grade fall semester and then
11 in order to stay eligible they look at the grades for
12 your five- and ten-week too.

13 Q I'm sorry. You were saying they look at your
14 grades. What else?

15 A They look at your grades and -- they just look
16 at your grades. Like I said, they look at your five-
17 and ten-week grade to make sure that you are standing
18 up. They look at your attendance record.

19 Q What award did you receive for your Stanford 9
20 scores?

21 A The \$1,000 scholarship from Gray Davis.

22 Q When was that?

23 A I just got the letter two weeks ago. And I was
24 told that it was for my 9th grade year at Crenshaw.

25 Q Any other award besides those two?

1 A Perfect Attendance Award. And a Peer Mediation
2 Award.

3 Q When was the Perfect Attendance Award given?

4 A The Perfect Attendance Award was given in my
5 first semester of my 10th grade and also I received it
6 for the second semester of my 9th grade year.

7 Q Any other awards?

8 A Not that I can think of right now.

9 Q How long were you in the teacher training
10 magnet program at Crenshaw? Your whole time when you
11 were there?

12 A Yes. 9th and 10th grade year.

13 Q Did you take any other classes specifically
14 about teacher training as part of that program?

15 A A lot of times my English class in my 9th grade
16 Ms. Amaeche would have me facilitate a class. What she
17 did was, she will send -- what they will do, they will
18 switch students. She will send her students to
19 Mr. Camagian's class and Mr. Camagian will send his
20 students to Ms. Amaeche's class just to get a feeling of
21 how different teaching methods are.

22 So what they did was to make sure that
23 everybody learned the same thing and stayed on task.
24 When we were in Ms. Amaeche's class, we learned "Romeo
25 and Juliet." We read the book and we analogued the text

1 and everything. And when it was time to go onto the
2 next book which was "Why the Caged Bird Sings," she said
3 in order for us to, you know, all be on the same, you
4 know, level she sent us to Mr. Camagian's class to learn
5 that since he had taught that -- while we were learning
6 "Romeo and Juliet," he was teaching "Why the Caged Bird
7 Sings." So when it was time for us to switch books, we
8 just transferred, everybody went to Ms. Amaeche's class;
9 we all went to Mr. Camagian's class.

10 Q Was that just for students in the teacher
11 magnet program?

12 A I don't know. But I know she -- we were told
13 that it was cleared through Ms. Silverstein that we can
14 do that. She did present the idea to Ms. Silverstein
15 and that is how we got the chance to do that.

16 Q Was Ms. Amaeche, was she kind of the teacher in
17 charge of the teacher training program?

18 A No.

19 Q Who was?

20 A Ms. Silverstein, the teacher training magnet
21 counselor.

22 Q What else did you do as part of the program
23 that might be different than what other students at
24 Crenshaw did?

25 A Mr. Camagian, he had me facilitate a class

1 where we would read articles in newspapers or we would
2 read a book and he will have me teach the class on what
3 the text really means.

4 Q Did he have other students in the program do
5 that?

6 A Yes.

7 Q Anything else that you did in the teacher
8 training magnet?

9 A That's it.

10 Q Did you ever have any speakers or go to
11 anything like at a college about teachers?

12 A We went to the Los Angeles County Museum of Art
13 with Ms. Silverstein in my 10th grade year along with my
14 10th grade English teacher. She offered me to go to
15 Africa and go to -- go on a historically black college
16 trip. I never did get the chance to go.

17 Q Why not?

18 A For the trip -- well, the reason why is I had
19 already transferred out when the trip to Africa was
20 coming. And then the trip to the historically black
21 colleges, I just chose not to go.

22 Q Was that trip something that other students in
23 the teacher training program could do?

24 A Yes.

25 Q And the trip to the historically black

1 colleges, that was something the other students in the
2 program could do?

3 A Yes.

4 Q Was there anything else?

5 A That's it.

6 Q In the program did you ever talk about or learn
7 about how teachers become teachers, like the process
8 they have to go through?

9 A No.

10 Q How do you think a teacher learns how to teach?

11 MS. LHAMON: Object; calls for speculation.

12 THE WITNESS: I think the teacher learns how
13 to teach by -- it's not really a thing -- it's not
14 something that you can learn how to do. It is something
15 that you do. Because one thing that we did at Crenshaw
16 is that it was called a "learn community," and the whole
17 point of calling it the learn community is that the
18 teachers learn from the students and the students learn
19 from the teachers.

20 Because without the teacher first learning
21 about the students, then there's nothing that she really
22 can teach because she doesn't know -- he or she doesn't
23 know what there is to teach. And so if the teacher
24 doesn't know what we know already, then there is no way
25 you can teach anything. And then a lot of times a

1 teacher needs to kind of bring in real life experiences
 2 to the teaching method so we can get a feel of, you
 3 know, what they mean.
 4 BY MS. VANSE:
 5 Q Can you give me an example of a real life
 6 experience, what a teacher could bring in that might be
 7 helpful for teaching?
 8 A One thing is like religion. Like I know our
 9 English teacher tried to tie in religion to English like
 10 different texts that come from different religions.
 11 That is one thing that she brought in because she was
 12 Jewish and she taught us how like her mom or her dad
 13 taught her compared to how we learn in our classrooms
 14 today.
 15 And then she brought in like different things
 16 that she reads. And she will talk about how something
 17 that she read is different from something how --
 18 something that we read because two different -- you
 19 can't -- two different people can tell two different
 20 stories based on their background. It could be the same
 21 event but they will tell the story differently based on
 22 what they experienced or how they felt about the
 23 situation.
 24 Q Do you think that is something that your
 25 teacher, like the technique of actually going through

1 degree in teaching.
 2 Q I'm going to break it down a little bit. What
 3 does a "permanent teacher" mean?
 4 A A permanent teacher?
 5 Q Yes.
 6 A A teacher who is going to stay in school. Who
 7 I guess is sort of like registered and that's the school
 8 that they are going to teach at for a period of time --
 9 for a long period of time.
 10 Q And then is credentialed the definition you
 11 told me before?
 12 A Yes.
 13 Q Do you think that being a permanent and
 14 credentialed teacher affects how a person teaches?
 15 A No.
 16 Q Do you think being not permanent or not
 17 credentialed affects how a person teaches?
 18 MS. LHAMON: Objection; compound.
 19 MS. VANSE: I can break that down.
 20 Q Do you think being a nonpermanent teacher
 21 affects how someone would teach?
 22 MS. LHAMON: Calls for speculation.
 23 THE WITNESS: A nonpermanent teacher as in
 24 someone who is -- if they are a nonpermanent teacher and
 25 it is not guaranteed that they will stay in the school,

1 that process, is that something that she learns, let's
 2 say, in college or other where -- somewhere else or is
 3 it just something that she just kind of knows what to
 4 do?
 5 MS. LHAMON: Objection; calls for speculation.
 6 THE WITNESS: It is something that she just
 7 knows how to do. It is nothing -- I mean I don't think
 8 you can learn it.
 9 BY MS. VANSE:
 10 Q Do you think there is any training that might
 11 be good for teachers to take to help them become better
 12 teachers?
 13 A How to relate to the students.
 14 Q Anything else?
 15 A That's it.
 16 Q Do you know how teachers are hired at Crenshaw?
 17 A No.
 18 Q Do you what a permanent and credentialed
 19 teacher is?
 20 A A permanent credentialed?
 21 Q Permanent and credentialed.
 22 A Yes.
 23 Q What is it?
 24 A A teacher who is certified to teach a class and
 25 isn't still going through the process of getting their

1 it probably would because they will have to be pressed
 2 for time in what they are going to teach because it is
 3 not guaranteed that they are always going to be there at
 4 the school.
 5 Q Any other way that being a nonpermanent teacher
 6 would affect how a person teaches?
 7 A No, not really. No.
 8 Q How do you think being noncredentialed might
 9 affect how someone teaches?
 10 MS. LHAMON: Objection; calls for speculation.
 11 THE WITNESS: There's really no difference --
 12 well, there is a difference in between a noncredentialed
 13 teacher and credentialed teacher. Because I noticed
 14 that -- from my experiences I noticed that credentialed
 15 teachers, they tend to, if they have been there for a
 16 long period of time, they tend to just hand you the
 17 book and say "Here. Do this assignment." And
 18 noncredentialed teachers, I noticed the ones that I have
 19 had, they actually, you know, they talk to you about it,
 20 it's like a class discussion. And then they tell you --
 21 they ask you to write about your own thoughts about
 22 what -- about the assignment. Or they just don't hand
 23 you a book and just say "Do the assignment."
 24 Q Do you know why being a credentialed teacher
 25 might change that and make them a better teacher?

1 MS. LHAMON: Objection; calls for speculation.
 2 THE WITNESS: Can you clarify that question?
 3 BY MS. VANSE:
 4 Q Do you know how a teacher becomes credentialed?
 5 A No.
 6 Q What do you think a teacher might do to become
 7 credentialed that would help them teach?
 8 MS. LHAMON: He can't answer that question. He
 9 just told you he doesn't know how a teacher becomes
 10 credentialed.
 11 THE WITNESS: I don't know how a teacher
 12 becomes credentialed.
 13 BY MS. VANSE:
 14 Q You do think that being a credentialed teacher
 15 helps a person teach better?
 16 A No, I didn't say that.
 17 Q I'm going to give you a list here. Do you know
 18 what a full nonemergency teaching credential is?
 19 A No.
 20 Q How about a multiple subject credential?
 21 A No.
 22 Q Single subject credential?
 23 A No.
 24 Q Do you know what a university internship
 25 credential is?

1 A No.
 2 Q District internship credential?
 3 A No.
 4 Q How about an emergency permit?
 5 A No.
 6 Q Do you know what a credential waiver is?
 7 A No.
 8 Q Going back to the teachers you talked about
 9 that you had in the 9th grade, do you know which of
 10 those teachers were permanent and credentialed?
 11 A In my 9th grade year -- let me think back.
 12 Q Do you want me to read the list and you can see
 13 if you recall?
 14 A Yeah.
 15 Q For 9th grade algebra you had [REDACTED]. Do
 16 you know if she was --
 17 A She was credentialed. Well, I wouldn't know,
 18 but I can tell you the teachers that told the class they
 19 were or they were not.
 20 Q We can start there. What teachers told the
 21 class that they were credentialed?
 22 A I will have to hear.
 23 Q How about Mr. Patrick?
 24 A I don't know.
 25 Q Just to be clear, [REDACTED], you didn't know

1 if she was credentialed or not?
 2 A Uh-uh.
 3 Q Mr. Diaz?
 4 A I don't know.
 5 Q Mr. Hill?
 6 A I don't know.
 7 Q Ms. Amaeche?
 8 A She was not credentialed.
 9 Q How do you know that?
 10 A Because she told the class.
 11 Q You had her for English both semesters your
 12 freshman year, right?
 13 A My freshman year I had Ms. Amaeche for the
 14 first semester and --
 15 Q And then Mr. Camagian?
 16 A Right.
 17 Q Do you know, was Ms. Amaeche still at the
 18 school in your second semester?
 19 A Yes.
 20 Q Yes, she was still at the school?
 21 A Yes.
 22 Q Did Ms. Amaeche tell you at all if she had any
 23 sort of credential?
 24 A No.
 25 Q Do you know about Ms. Stewart, do you know if

1 she had a credential?
 2 A I don't know.
 3 Q Mr. Jones?
 4 A I don't know.
 5 Q And Mr. Camagian?
 6 A Mr. Camagian, I don't know.
 7 Q So Ms. Amaeche was your only teacher in the 9th
 8 grade year that talked about not having a credential?
 9 A Yes.
 10 Q How about your 10th grade year, Ms. Lowe?
 11 A No.
 12 Q When you say no, you don't know whether she had
 13 a credential?
 14 A No, she did not have a credential.
 15 Q How do you know that?
 16 A Because she talked about not having a
 17 credential -- I don't know how the system works, but she
 18 talked about not having a credential for teaching in
 19 California, but she did tell me that she did teach in
 20 New Orleans. And I am not sure if she had a credential
 21 for teaching in New Orleans or if she did not.
 22 Q Did she tell you anything else about her
 23 becoming credentialed or anything like that?
 24 A No.
 25 Q How about Ms. Coreley, do you know if she was

1 credentialed?
 2 A No. I don't know.
 3 Q Ms. Palomino?
 4 A No.
 5 Q Do you know if Ms. Mims had a credential?
 6 A No, she did not.
 7 Q How do you know that?
 8 A Because she told us that she was still in
 9 school and she said that she was still -- she told us
 10 that she did not because she was still going to school
 11 and she was still going through the process.
 12 Q Did she tell you at all what kind of
 13 credential, if any, she had?
 14 A No, she did not tell me.
 15 Q Going back to Ms. Palomino, do you know if she
 16 had a credential?
 17 A No. She told us she was still going to school.
 18 Q How about Ms. Ortiz, did she tell you if she
 19 had a credential?
 20 A She told us that she did not because in the
 21 beginning of the semester she told us that she was still
 22 working on getting her degree and getting her credential
 23 for teaching.
 24 Q Did Mr. Mosbenmosche?
 25 A I don't know if he did, but he is an older

1 teacher so most likely he did.
 2 Q But you don't know?
 3 A I don't know.
 4 MS. LHAMON: Can we take a break, please?
 5 MS. VANSE: Yes, we can.
 6 (Recess taken from 2:49 p.m. to 2:57 p.m.)
 7 (Ms. Lampkin left the proceedings.)
 8 BY MS. VANSE:
 9 Q The teachers that told you that they didn't
 10 have their credential, and this can be either your 9th
 11 grade or 10th grade year at Crenshaw, how did that come
 12 up?
 13 A Usually --
 14 MS. LHAMON: Object. It is compound because it
 15 is so many teachers.
 16 THE WITNESS: I can answer that question.
 17 Usually -- well, for all the teachers -- all the
 18 teachers that I knew, those teachers were all new to the
 19 school. And all the teachers on the first day of
 20 school, because the students have never seen them before
 21 they will kind of ask questions about the teacher. And
 22 all the teachers said, you know -- that is the way it
 23 would be brought up.
 24 They will explain why they were new, where they
 25 came from, what they did before they became a teacher.

1 And then that is when it will come up, whether they are
 2 still in school or how old are they. Because all the
 3 ones that said that they were uncredentialed were --
 4 they were pretty young. They looked pretty young. So
 5 it will come up, somebody will ask "Well, how old are
 6 you?"
 7 Q Were these students that were asking this?
 8 A Yes.
 9 Q So like at the beginning of the class period?
 10 A Like the first day of school.
 11 Q For Ms. Amaeche, she wasn't credentialed,
 12 right, your 9th grade English teacher?
 13 A Yes. No, she was not.
 14 Q Do you remember what she told you about where
 15 she had been before she came to Crenshaw?
 16 A She said she came from England. And she was
 17 teaching some students out there.
 18 Q Did she tell you what school she was in?
 19 A No.
 20 Q What about Ms. Lowe, did she tell you where she
 21 had come from?
 22 A She said she came from New Orleans and she
 23 taught in a school out there.
 24 Q How about Ms. Palomino, did she say where she
 25 had been before she came to Crenshaw?

1 A As far as I know, she either came from UCLA or
 2 USC, but I'm not sure of that, though.
 3 Q You mean she had been a student there?
 4 A Yes.
 5 Q Did Ms. Mims tell you where she had been before
 6 coming to Crenshaw?
 7 A No. She did tell us that her mom works there.
 8 Q At Crenshaw?
 9 A Yes.
 10 Q Did Ms. Ortiz tell you where she had been
 11 before coming to Crenshaw?
 12 A No.
 13 Q Other than Mr. Patrick, did you ever have a
 14 substitute in a class for more than a week at a time?
 15 A No. Wait. Let me think about that.
 16 Ms. Amaeche, when she was going through the process of
 17 becoming a teacher at Crenshaw, this was like the first
 18 two weeks of school in my 9th grade year, she wasn't
 19 there for about two weeks and that was the first two
 20 weeks of school, and that is only because she was still
 21 going through the process of becoming a teacher at
 22 Crenshaw.
 23 Q Do you know anything about that process, what
 24 she had to do?
 25 A No. The substitutes and the administrators who

1 did sub the class while they were -- while Ms. Amaeche
2 was gone, the only thing they brought up was finger
3 printing. The same thing with Ms. Ortiz. Ms. Ortiz
4 wasn't there in the class for the first week, but for
5 those classes we had a sub that would come in. It was
6 like a sub -- we didn't switch subs. It was the same
7 sub everyday.

8 Q You had the same sub in English?

9 A Yes.

10 Q And the same sub in Spanish?

11 A Yes.

12 Q Other than those two teachers and Mr. Patrick,
13 did you ever have a substitute for more than a week at a
14 time at Crenshaw?

15 A No.

16 Q Have you ever had a class at Crenshaw that
17 didn't have a teacher at all?

18 A That didn't have a teacher at all? As in what?
19 There was a sub the whole time?

20 Q No. What I mean is you had a class that didn't
21 have a teacher, no substitute, no administrators, no
22 teacher that showed up for a class.

23 MS. LHAMON: Asked and answered.

24 THE WITNESS: I only think about one time for
25 [REDACTED] class. Only one time. Other than that

1 A I don't know.

2 Q Did that student come back to class?

3 A Yes.

4 Q Did they say anything?

5 A No.

6 Q Other than that time with [REDACTED] class,
7 have you ever been locked out of a classroom?

8 A Locked out as in what?

9 Q As you couldn't get in.

10 A Couldn't get in and there was no teacher?

11 Q Actually let me go back. The time when
12 [REDACTED] didn't show up, were you actually able to
13 get into the class?

14 A No.

15 Q You were waiting --

16 A There was one time where [REDACTED] wasn't
17 there but the door was unlocked and we all went in and
18 the administrator did come in that one time, and they
19 asked us how did we get into the classroom and we just
20 told them it was unlocked.

21 Q What happened after that?

22 A The administrator stayed in there the entire
23 time. After they showed up they stayed in there. And
24 the thing about that, nobody was sure if [REDACTED]
25 was there earlier that morning or she showed up that day

1 for any other teachers, no other teachers.

2 BY MS. VANSE:

3 Q Was the one time with [REDACTED] when you had
4 to wait for about a half hour for someone to show up?

5 A Yes. We waited outside and then -- a lot of
6 students -- we waited for about 45 minutes. The bell
7 was going to ring in another 10, 15 minutes, and all the
8 students just left.

9 Q Did anyone, like an administrator or the
10 principal, come down to check on the class that one
11 time?

12 A No.

13 Q Did anyone from the class go down to the
14 principal's office and let them know there was no
15 teacher?

16 A Yes.

17 Q Who did?

18 A Do you want them by name?

19 Q Was it just a student in the class?

20 A Yes, it was a student in the class.

21 Q Do you know what they said --

22 A No.

23 Q -- did they come back and tell you?

24 Do you know if they actually made it to the
25 principal's office?

1 or what happened, but the door was unlocked and the
2 lights were on.

3 Q Did the administrator teach algebra that day or
4 did he just kind of supervise?

5 A He just kind of supervised.

6 Q Who was that, do you remember?

7 A Ms. Macadoo.

8 Q Was there another time when you couldn't get
9 into the class at all?

10 A Yes. That was the time that I explained
11 previously.

12 Q The time when you could get into the class,
13 into [REDACTED] class, do you remember about what
14 time of year that was, what month?

15 A No.

16 Q Was it your first semester?

17 A I can't remember.

18 Q Do you remember if it was during your algebra
19 class or when you were in math investigations?

20 A I really can't remember.

21 Q How about the second time when you couldn't get
22 in at all, do you remember when that was, the second
23 time? The one time you couldn't get in at all, but the
24 second instance we have been talking about.

25 A The second time when the door was open?

- 1 Because I only explained one time when we just couldn't
2 get in completely.
- 3 Q That was when -- you don't remember when that
4 was?
- 5 A Yes.
- 6 Q How about the time when you could get in and
7 when Ms. Macadoo came into the class?
- 8 A When was that? The second semester.
- 9 Q Have you ever heard of any other classes at
10 Crenshaw that didn't have a teacher show up at all?
- 11 A No.
- 12 Q Have you ever heard about any other classes at
13 Crenshaw where students were locked out of the class?
- 14 A No. Locked out as in what?
- 15 Q Like they couldn't get into the classroom, they
16 had to stay in the hall or just wait.
- 17 A You mean the entire class?
- 18 Q Right.
- 19 A No.
- 20 Q How about for part of the class?
- 21 A For part of the class, no. There was an
22 instance where there was maybe about one or two
23 students.
- 24 Q Were locked out of the class?
- 25 A Yes.

- 1 Q Describe that for me. What was that all about?
- 2 A It was because we had -- at Crenshaw they have
3 this thing called tardy sweep. When the tardy bell
4 rings all the teachers close their doors and they lock
5 them and any student that comes to the door after the
6 bell rings, they have to go to the tardy sweep. But a
7 lot of times the students don't go to the tardy sweep,
8 they go to the class, and the teachers just don't answer
9 the door completely or they will go to the door and tell
10 the students to go to the tardy sweep.
- 11 Q So you have heard of students getting locked
12 out in situations like that?
- 13 A Yes.
- 14 Q Have you ever been in a situation like that?
- 15 A No.
- 16 Q Who did you hear about?
- 17 A Name or what?
- 18 Q Sure.
- 19 A What was his name? I heard of one girl named
20 Kalisha. She was locked out. I can't remember her last
21 name. That's about the -- there was a few more people.
22 And Terron, my friend Terron, but I don't remember the
23 last name. There was a few more people that I can't
24 remember right off the top of my head.
- 25 Q Do you know what happened? Did they get into

- 1 class eventually?
- 2 A I don't know.
- 3 MS. LHAMON: If you know how to spell Terron
4 and Kalisha, you should spell that for the reporter.
- 5 THE WITNESS: I don't know how to spell
6 Kalisha's name, but Terron is T-e-r-r-o-n.
- 7 MS. VANSE: I'm going to take a quick break, if
8 that's okay.
- 9 (Recess from 3:10 p.m. to 3:16 p.m.)
- 10 BY MS. VANSE:
- 11 Q For your algebra class your 9th grade year, did
12 you have a textbook in this class?
- 13 A No.
- 14 Q What did you use instead?
- 15 A Our teacher, she made copies of work sheets.
16 What she would do is she would tell us to either finish
17 it that day or bring it in the next day.
- 18 Q What would the work sheets have on them?
- 19 A Just -- it's different. During different times
20 of the semester you do different things. I think for
21 the first part of the semester we worked on problem
22 solving. The next part we worked on integers. We
23 worked on just various math problems on the work sheets.
- 24 Q Did the work sheets just have problems on there
25 or did it have instructions on how to complete the

- 1 problems?
- 2 A Sometimes they will have instructions. A lot
3 of times they will have the problems -- just the
4 problems on there, but the reason for that is because
5 maybe -- whenever my teacher would show up she would
6 sometimes write notes on the board so we would use that
7 and take it home in order to figure out what to do for
8 the problems that she gives us on the work sheets.
- 9 Q You would use the notes that you would copy
10 from the board?
- 11 A Yes.
- 12 Q Did you use anything else in algebra, any other
13 books or anything like that?
- 14 A During the second semester that's when we
15 really started using books because I don't know if she
16 had just got them in or not, but that is when we started
17 using books.
- 18 Q This was in math investigations?
- 19 A Yes. We only used the books like every now and
20 then. We really didn't use them as in like going
21 through it chapter by chapter or anything like that. We
22 just used it every now and then.
- 23 Q Did you have handouts in math investigations?
- 24 A Yes.
- 25 Q When you would use the book in math

- 1 investigations, what would you use it for?
 2 A She would tell us to copy down the problems out
 3 of the book and then take the problems home and we could
 4 do them at home.
 5 Q Did you ever take the book home?
 6 A No.
 7 Q Did you ever want to?
 8 A Yes.
 9 Q When did you want to?
 10 A A lot times the teacher would say not to take
 11 it home, but I would take it home maybe once or twice.
 12 I'd take it home especially if I didn't understand what
 13 the assignment was about because I know [REDACTED]
 14 she never did stay after school. Because I think her
 15 conference period was -- the period she has free was
 16 sixth period. And I don't know if she went home after
 17 that or what because when I would go in there she was
 18 never there after school.
 19 Q How many times did you try and see [REDACTED]
 20 after school?
 21 A Two or three times. And I never did go -- I
 22 asked one of the students if she is there during -- I
 23 mean after school or not. And they said that they think
 24 she is not because she goes straight home after school.
 25 Q Was this first semester or second?

- 1 A First and second.
 2 Q So you went two or three times after your first
 3 semester?
 4 A I know I went two or three times.
 5 Q Total?
 6 A Just altogether, two or three times.
 7 Q Was [REDACTED] there any of the times that
 8 you went to see her?
 9 A No.
 10 Q In algebra did you use the computer lab at all
 11 for algebra?
 12 A No.
 13 Q Anything else other than the work sheets?
 14 A No.
 15 Q How would you study for a test in algebra?
 16 This is 9th grade.
 17 A We really didn't have the time to do any tests.
 18 A lot of times she will come in on a Friday and she will
 19 say okay, we are going to have a test. And we will ask
 20 her what the test is going to be about and she always
 21 tells us whatever the last things we learned is what the
 22 test is going to be about. Because of her coming in
 23 every now and then, it was like the test was really
 24 about nothing. We had like 20 problems on there, but
 25 they were like mostly the same problems. The test was

- 1 still a work sheet. She just counted it as a test.
 2 Q Do you remember how many tests you had in
 3 algebra your 9th grade year?
 4 A I don't remember, but it was a few.
 5 Q Did you have a final exam?
 6 A No.
 7 Q Did you take work sheets home for homework?
 8 A Yes.
 9 Q Were you required to bring them back?
 10 A Yes.
 11 Q Were those graded?
 12 A Yes.
 13 Q For math investigations, do you remember when
 14 you received the textbooks?
 15 A It was in the middle of the second semester,
 16 close to the middle of the second semester.
 17 Q Do you know why you received them then?
 18 A No.
 19 Q Did you ever ask?
 20 A No.
 21 Q Did you have tests in math investigations?
 22 A Yes.
 23 Q About how many?
 24 A It was a few. Again, a few. It wasn't a lot.
 25 Q How would you study for those?

- 1 A Well, I would take all the notes that I took,
 2 which is a few. And like the way the notes were, it
 3 wasn't really like notes she wrote on the board. If we
 4 had a work sheet the day before, she would ask if we had
 5 any trouble with the work sheet. If we had a couple
 6 problems she would put it on the board and work them
 7 out. Those were the notes that we had. The only time
 8 that she really took the time to go over notes was when
 9 she was talking about different types of shapes and how
 10 to make a box or something like that.
 11 Q Did you ever use the textbook to study for a
 12 test?
 13 A No. Because we couldn't take them home.
 14 Q Did the other class use the same books?
 15 A Yes. But there was only about two or three
 16 other classes because the rest of the classes that she
 17 had, they were algebra classes.
 18 Q So they used different books?
 19 A Yes.
 20 Q For your 9th grade algebra do you know if any
 21 other algebra classes had textbooks?
 22 A I don't know.
 23 Q Did you ever see any other students with an
 24 algebra textbook in the 9th grade like the first
 25 semester?

1 A Yes.
2 Q Can you remember like about how many students
3 you saw with an algebra textbook?

4 A It wasn't like how many I saw, it was just like
5 they had them in their backpack; but it was actually one
6 where I saw her textbook. So I figured other students
7 had textbooks.

8 Q Did you know if that student was in the 9th
9 grade?

10 A Yes.

11 Q Any other times you can remember seeing someone
12 with an algebra textbook in the 9th grade that first
13 semester?

14 A I seen them all throughout the first and the
15 second semester. Like I say, it was only about one or
16 two students that I actually saw their textbooks and
17 they said that they had textbooks for their classes.

18 Q So you talked to them about the textbooks they
19 had?

20 A Yes.

21 Q What did you talk about?

22 A I asked them what were they working on. And
23 like I said earlier, I would ask them if they were
24 working on the same thing we were working on. And they
25 would have their textbooks out or they could be doing

1 A She told us that -- because on the inside it
2 came from a school, I think it was Woodrow Middle
3 School. And we asked her about it. And she said the
4 reason that she got the books from that school was
5 because that school had banned those books. They didn't
6 use the books anymore so they went ahead and gave them
7 to Crenshaw.

8 The main reason I know why those books came
9 from the other school because she told me -- because I
10 knew the textbook room clerk, she told me to take those
11 books down and make sure I get them checked by the --
12 what is it called? It's called the -- it's a -- it's
13 the person whoever is in charge of that -- in charge of
14 the -- what do you call that? I can't remember the name
15 of it right now. But it is the person in charge -- it
16 is the person in charge of the algebra or the math
17 chapter or whatever they call it. It's called the math
18 department or something like that. Some kind of
19 department. And I had to get them certified by the
20 Title 1 office, too.

21 Q Did you go and do that, get it --

22 A Yes. I had to get it checked by one of the
23 assistant principals and go get it checked by the
24 department chair. The department chairperson, that's
25 what it's called.

1 their homework during lunch or in the library or during
2 nutrition. That is how I knew they had textbooks.

3 Q Did you ever ask anyone if you could look at
4 their algebra book to help you?

5 A No.

6 Q Do you think if you had an algebra textbook it
7 would have been helpful?

8 A Yes.

9 Q How do you think it would have helped?

10 A That way I can take it home and I can study.
11 Like do a review of the chapter or whatever we were
12 working on and just go through the chapter. Because in
13 the textbooks they show you methods of doing problems or
14 solving problems and I could have went through that and
15 repeated those steps and studied for tests.

16 Q When you took algebra in 10th grade, did you
17 have a textbook?

18 A Algebra in 10th grade we had -- there was a
19 class set, but then when we got into like the -- like
20 close to the second semester we did eventually get a
21 book. And those books we could take home. She made
22 sure -- our teacher made sure that everybody had a book.
23 The only reason that we got those is because she got
24 those in from another school.

25 Q How do you know that?

1 Q Why were you doing this?

2 A Because I had leadership the period after I had
3 algebra. Because I had algebra third period and I had
4 leadership fourth period. And leadership is like a
5 period where I can make sure that stuff gets done and
6 make sure -- I told my teacher I have leadership. And
7 she asked me if I could do her a favor and I said yeah.
8 And she told me that she wants me to go get those books
9 checked out and that's what I did because I had a free
10 period that day. I didn't have any activities to work
11 on.

12 Q So you bought the books there and then what
13 happened?

14 A When I went to go to the assistant principal's
15 office I talked to -- what is her name? The assistant
16 principal was -- I can't remember the assistant
17 principal's name right now. I forgot her name. But
18 after I talked to her, she told me to go take it to the
19 department chairperson. I took it to him. I took it to
20 the department chairperson. I can't remember his name
21 either. And then I took it to the textbook room.

22 Whoever the clerk was in there, she told me --
23 she asked me if I got it certified by the department
24 chair and I told her yes. After she asked me about
25 the -- where the books came from and everything, she

1 told me to go stack them in the back storage room in the
2 math department -- in the department chair's section on
3 a cart. And about a week after that the books came back
4 to our class and that's when she started distributing
5 them, our teacher started distributing the books.

6 Q Did you ever have to do that for any other
7 class?

8 A No.

9 Q Do you know what happens when a book is
10 certified by the department chair?

11 A No. I was told that the reason why they have
12 to be certified is because we have to see if the school
13 is going to actually -- if the book is legally -- can be
14 legally used within the school. Because if the book is
15 used in our school, it has to be used in all other
16 schools. We have to make sure that the books aren't
17 banned from the school district or wherever the books
18 are being used.

19 Q Who told you that?

20 A Ms. Palomino. She told me that is -- not
21 Ms. Palomino. The assistant principal told me. And
22 that is why she told me to go to the department
23 chairperson and go get the books certified.

24 Q Did anyone else say anything about how the book
25 or why the book needs to be certified?

1 like every week and she kept telling me no.

2 Q Just first semester 9th grade, did you ever use
3 or have a textbook to use in class?

4 A No.

5 Q Do you know why?

6 A No.

7 Q Did you ask your teacher during that first
8 semester if there was a textbook?

9 A No.

10 Q The second semester with math investigations,
11 did you ever have a textbook to use in class or to take
12 home?

13 A Yes. But those are the ones that -- not to
14 take home. But the ones that were there are the ones
15 that we used like every now and then. We didn't use
16 them a lot. And then I eventually started to ask can we
17 take the books home since they were there and we like
18 barely used them and she said no, she has to use them
19 for her other classes.

20 Q And those other classes were other --

21 A Algebra classes and whatever other class she
22 had.

23 Q How many times did you ask her if you could
24 take one home?

25 A Almost every week.

1 A No.

2 Q When you were in algebra in 9th grade, did you
3 ever ask anyone if you could take an algebra text home?

4 A Yeah. I asked my teacher numerous times. She
5 kept telling me no, because she has to use the books for
6 her other classes.

7 Q Do you remember how many times you asked her?

8 A I asked her almost every week. Whenever she
9 was there. Almost every week.

10 MS. LHAMON: I would like to just clarify that
11 question. You referred to the algebra textbook, but he
12 testified that he didn't have an algebra textbook. Are
13 you referring to the math investigations textbook?

14 THE WITNESS: The books that were in that class
15 that we could not take home.

16 BY MS. VANSE:

17 Q Algebra class was your 9th grade year?

18 A Yes. At Crenshaw.

19 Q At Crenshaw. You did have textbooks in the
20 class?

21 A They were in the class. And in the first
22 semester I guess they were in storage. I don't know
23 where they were, but then she brought them in the second
24 semester, and the second semester that is when I started
25 asking her can we take the books home and I asked her

1 Q Her answer was the same every time?

2 A Yes.

3 Q Did you ever talk to anyone else about taking a
4 book home?

5 A Taking a book home in 9th grade?

6 Q In either your 9th grade algebra or your 9th
7 grade math investigations.

8 A Talk to anyone else as in an administrator or
9 what?

10 Q An administrator, your mom, anyone.

11 A No.

12 Q The books that you did use occasionally in your
13 math investigations class, what kind of condition were
14 those books in?

15 A Some of them were in good condition. The other
16 ones they were -- they had writing and stuff on them.
17 But the books weren't that bad, but they did have
18 writing in them and every now and then you would see
19 like a book with one or two pages torn out. I guess
20 some of the books were older books and yet they ordered
21 some new ones. Because it was quite a few of them that
22 kind of looked new.

23 And the books that did look old, they had
24 like -- some of them, well, most of them had this I
25 guess they fell in something or something because it was

- 1 like sticky. Like a film sort of like sticky stuff on
 2 there. But it wasn't sticky, but you could tell it was
 3 like some kind of stuff that stuck to the floor or
 4 something.
- 5 Q Do you know about how many times total during
 6 the second semester you used a book in math
 7 investigations?
- 8 A I really can't remember.
- 9 Q Would you say that you used one once a week?
- 10 A Yeah, about once a week.
- 11 Q How many times did you have a book that had
 12 writing in it in math investigations?
- 13 A Almost every time.
- 14 Q Where would the writing be? On the side,
 15 inside the book?
- 16 A Most of time it is like in the back on the last
 17 page because in most books the last page is just a plain
 18 white page and there will be writing in there.
 19 Sometimes there will be writing on different math
 20 problems. And then you will see like check marks on the
 21 math problems like in the book as somebody had worked in
 22 it previously and they just put check marks in there.
 23 And you will see graffiti in it.
- 24 Q What kind of graffiti?
- 25 A I guess from different gangs or tagging crews

- 1 or whatever.
- 2 Q That is what it looked like, though, it looked
 3 like gang symbols or something like that?
- 4 A Yes.
- 5 Q Anything else?
- 6 A You will see notes that were written by other
 7 people in there.
- 8 Q For your math investigations books, how many of
 9 the books that you used had pages torn out?
- 10 A Only maybe about one or two.
- 11 Q One or two the whole semester?
- 12 A Yes. But I don't know -- like as far as how
 13 many that I've used that had pages torn out, that is how
 14 many times I've seen pages torn out.
- 15 Q Did you ever look at the date in the book to
 16 see how old it was?
- 17 A No.
- 18 Q Going back to 9th grade algebra, did any other
 19 students complain about not having a book in class?
- 20 A Yes.
- 21 Q Do you know who?
- 22 A Again, Kalisha. I don't know how to spell her
 23 name. A lot of other students. Another student that
 24 was in the class named Gerell. It's J-e-r-e-l-l.
 25 Excuse me. It's with a "G," not a "J."

- 1 Q Do you know who Kalisha complained to, if she
 2 did?
- 3 A No.
- 4 Q How about Gerell, do you know if he complained
 5 to anyone?
- 6 A No. A lot of times it will -- like they will
 7 ask the teacher and it will turn into a big argument
 8 between the students and teachers as to why we don't
 9 have any books that we can use or take home.
- 10 Q How many times did that happen during the
 11 semester there was an argument of some sort?
- 12 A Usually about every week. Maybe two or three
 13 times a week. And then there were times where the
 14 students would argue with the teacher about like why a
 15 teacher isn't there or why a teacher didn't take notes
 16 that day. And a lot of students will just walk out.
 17 They will get real frustrated and just walk out.
- 18 Q When you say argue, what do you mean?
- 19 A Like they will -- they will start -- it will
 20 begin to like -- it will start off with the students
 21 asking the teachers questions. And then the teacher
 22 would say, "Well, I don't know" or "Why are you asking
 23 me?" or something like that. And the students will get
 24 real frustrated. It will escalate. And the teacher
 25 will just say, you know, "Just get out." Sometimes the

- 1 students they will not leave or the students will just
 2 get fed up. It depends on how far it goes.
- 3 A lot of times like if the student really isn't
 4 mad but they are still asking the teacher, they will
 5 calm down and they will just sit in class and they won't
 6 say anything else about it. But then a lot of times
 7 they will just start arguing with the teacher and they
 8 will just walk out. They will get real frustrated and
 9 they will just walk out.
- 10 Q How many times did someone walk out of class
 11 because they were frustrated in math?
- 12 A Most of the time it is the same people. The
 13 same people. It is maybe about anywhere like five times
 14 or ten times.
- 15 Q Five times the whole semester?
- 16 A Yes.
- 17 Q The same person?
- 18 A It was actually not like the same person as in
 19 one person. It was like a group of people who will do
 20 it not constantly, but they will be the main ones to
 21 like walk out. I guess they are like -- they are not
 22 real headstrong with arguing with the teacher or
 23 anything.
- 24 Q Do you know the names of any of those students
 25 that walk out?

1 A Deja. You spell her name D-e-j-a. And her
2 last name is -- I can't remember her last name. And
3 Kalisha will walk out. And there's -- let's see.
4 Kalisha, she will also sometimes she won't even walk
5 out. She will just cry about it. She will go to the
6 back and she will just cry about it.

7 Q Just the students that walked out. You said
8 there were some main ones who walked out?

9 A Those are the main ones because they will get
10 real frustrated. They will just get angry and just walk
11 out.

12 Q Just those two or anyone else?

13 A There were some more people, but I can't
14 remember the names.

15 Q Do you remember about how many?

16 A About how many, maybe about five.

17 Q You said that happened about five to ten times
18 the first semester?

19 A Yes. During the two semesters together.

20 Q The two semesters together?

21 A Yes.

22 Q How often did you have homework in your algebra
23 class, 9th grade?

24 A What she will do is, the assignment that day if
25 we didn't finish it in class, we would do it for

1 A Yes.

2 Q What kind of homework -- did you ever have any
3 homework where you had to look at the book to finish?

4 A Yes. What she will do is she will tell you to
5 copy a problem out of the book. A lot of times students
6 won't finish. After first period comes homeroom and a
7 lot of students will say forget it and just leave, then
8 they will come back and maybe at nutrition or lunch and
9 try to copy the problems. There was only about one or
10 two students that I know of that actually did that.

11 Q That actually came back and did the problems?

12 A Yes.

13 Q For math investigations did you have any work
14 that was designated specifically as homework, not just
15 classwork that you couldn't finish but specific
16 homework?

17 A Yes. The same amount of times as last
18 semester.

19 Q Was there any extra credits that you could take
20 in your algebra class?

21 A Yes.

22 Q What kind?

23 A She will tell students to sweep the floor to
24 get extra credit. Or like a few students she will tell
25 them they can take some work home, she will give them

1 homework. That was the main reason why people had
2 homework. Every now and then she will give us an
3 assignment. Maybe it was about only like five times a
4 semester when she will say -- she will give you a work
5 sheet and say this is homework.

6 But a lot of times, whatever we don't finish in
7 class, that was the homework. Because the work sheets
8 that she gave us in class were kind of -- a lot of them
9 were long, sometimes like 40 problems. She will say "If
10 you don't finish it in class, take it home, and that
11 will be your homework." Most of the time I can say we
12 did have homework because it was only like a few times
13 where students would actually finish it in class.

14 Q And then you said it was about five times she
15 gave you homework that was specifically just to be done
16 at home?

17 A Yes.

18 Q Any other homework besides that?

19 A That's it.

20 Q How about for math investigations, how often
21 did you have homework in that class?

22 A The same amount of times.

23 Q It was the same amount of homework?

24 A Yes.

25 Q So you had work sheets?

1 work and they will get extra credit. But that was like
2 every now and then. But she was -- I guess you could
3 say she was like selective who she gave the extra credit
4 to because she would not give extra credit to a lot of
5 students, for whatever reason I don't know.

6 Q How do you know she wouldn't give it to other
7 students?

8 A Because students would go ask for extra credit
9 and she will say no. And then another student will go
10 and ask her and she'll say, "Well, if you do it, your
11 point is only going to be raised to a certain amount" or
12 something like that.

13 Q Do you know any students that asked her for
14 extra credit?

15 A That did receive it or didn't receive it?

16 Q That did receive it.

17 A Gerell.

18 Q Is he the only one that you know of?

19 A Yes.

20 Q Do you know how many times he asked her?

21 A He asked her often. Probably about every week.

22 Q How do you know that?

23 A Because -- I mean we are all in the class
24 together. I mean it wasn't like a private -- he didn't
25 ask her like it was a private conversation type of

1 thing. I mean because -- usually he will ask when it's
2 time to turn in our work because all the students go
3 turn the work in at the same time. It is not like we
4 just collect it and take one big stack of papers up
5 there at one time. All the students go up to the desk
6 and a lot of students will hear some students asking for
7 extra credit or something like that.

8 Q Did any other students ask at the same time he
9 did?

10 A Yes.

11 Q Do you know how many?

12 A Maybe about one or two.

13 Q Would this be the same like every week they
14 would ask as well or --

15 A Maybe about -- yeah. I think the one or two
16 they were -- it will vary. Sometimes they will ask.
17 Sometimes they don't. It's like -- it wasn't like an
18 occasional thing. It is just like they will ask
19 sometimes. They wouldn't ask all the time.

20 Q For the students who received the extra credit,
21 do you know their names?

22 A Aaron. A -- it's capital A-a-r-o-n. So it's
23 two A's r-o-n.

24 Q Anyone else that you know of?

25 A That's it. I know Aaron, he would ask a lot

1 Q Do you know if he got extra credit every time?

2 A I'm not sure. I didn't see her mark it in the
3 roll book or anything. But she will tell him that he
4 will get extra credit.

5 Q What about extra credit for math
6 investigations, did anyone receive it then?

7 A It was the same people in the same class, so
8 the same thing happened the second semester for math
9 investigations. Almost everything that happened in the
10 first semester happened in the second semester too. It
11 was the same teacher, the same students in the class
12 except maybe for one or two because they were
13 transferred to the algebra class.

14 Q So other than Gerell is there anyone else
15 you remember that asked for extra credit in math
16 investigations that didn't receive it?

17 A Sometimes Deja will ask.

18 Q Anyone else?

19 A Not that I know of. There was some other
20 students, but I can't think of their names.

21 Q About how many?

22 A About three others.

23 Q How do you know that they didn't receive it?
24 Because you heard it in class?

25 A Yes. She would just tell them no.

1 for extra credit. And sometimes she will say yes and
2 most of the time -- a lot of times she will say no, but
3 most of the time she will say yes. And then he will ask
4 to sweep the floor and then he will beg her and he will
5 say "Well, I cleaned off your chalk board" or something
6 like that and then she will say "Well, okay."

7 Q So you heard him ask in class?

8 A Yes.

9 Q Do you know if he ever actually received extra
10 credit?

11 A Yes.

12 Q How do you know?

13 A Because she said that she will give him extra
14 credit and she will tell him what assignment to do and
15 she will tell him to copy a page out of the book and
16 turn it in the next day or the next week.

17 Q So for Aaron how many times do you remember
18 that he received extra credit?

19 A I really can't remember.

20 Q Was he the only -- did he receive extra credit
21 for sweeping the floor?

22 A Yes.

23 Q Do you know how many times?

24 A He would sweep the floor probably like every
25 week.

1 Q Do you know why?

2 A No.

3 Q Other than Aaron do you know anyone else that
4 asked for extra credit and did receive it?

5 A Sometimes -- well, the thing with Gerell is
6 that most of the time she will say no, but it was maybe
7 about once or twice that she actually said yes.

8 Q Once or twice the whole semester?

9 A Yes.

10 Q So other than those two, Aaron and Gerell,
11 anyone else that you know that asked for extra credit
12 and received it?

13 A No.

14 Q For your 10th grade algebra class did you have
15 a textbook?

16 A Yes. Right before we got to the second
17 semester.

18 Q What did you use during the first part of the
19 first semester for algebra?

20 A Most of the time we had work sheets. We had --
21 she bought these boards like -- because during the time
22 we were working on linear equations so basically all we
23 had to do was copy the question off the board, but we
24 would copy the question off the board like every now and
25 then. That was rare. Most of the time we did have work

1 sheets. She brought these boards where we could work
2 with -- it was a graphing board so we wouldn't have to
3 get graphing paper. We would work on the graphing part.
4 Like what we would do is we would do the problems at
5 home and then we would work on the graphing part when we
6 would get back to school the next day. She would give
7 us classwork and homework.

8 Q What was the homework?

9 A The homework was just -- it depends on what we
10 were working on during the time. Right before we left
11 it was linear equations.

12 Q Was it a work sheet?

13 A Yes. It was a work sheet copied out of a book.

14 Q Were these work sheets different than what you
15 received in algebra the year before?

16 A Yes.

17 Q What made them different?

18 A The topic of what we were working on. Because
19 in math investigations we never did work on linear
20 equations. But because algebra and -- because we
21 learned algebra and math investigations, the problems
22 were like the same, but then we used them in a different
23 way. So we learned how to use -- like integers tie in
24 with linear equations because you have to know how to
25 graph. Because we use integers in math investigations

1 shortage?

2 A No.

3 Q Did you have any books that you could look at
4 for instruction in algebra before your textbooks came
5 in?

6 A Yes. She had books on the shelf. It was like
7 a set but it was like Algebra 2. She told me in
8 particular that if you want to look at those books for
9 the problem we are working on, look at the middle of the
10 book or the beginning of the book. She will tell me
11 exactly where to go to look for the problem we were
12 working on, even though the books weren't much, you
13 know, advanced level.

14 Q Could you take those books home?

15 A There was one or two times where she did let me
16 take those books home. If I asked to take a book home
17 she will say yes.

18 Q Did you ever ask to take a book home and she
19 wouldn't let you?

20 A No.

21 Q Do you know if other students took the book
22 home as well?

23 A I'm not sure. I don't know. I never have
24 known of any other students that asked so I don't know
25 if they eventually took one home or not.

1 and then we went to algebra and we did linear equations,
2 it was basically the same except we were graphing, using
3 the work problems that we did in math investigations and
4 changing them into graphing.

5 Q Do you remember what month you received the
6 textbooks in your 10th grade algebra?

7 A It was during November. Because it was right
8 before the second semester. Right before the first
9 semester was about to end.

10 Q Do you know why you received them then?

11 A Because those books had just come in from the
12 middle school because our teacher told us that because
13 the school was short on books she went looking for books
14 and she eventually found books that we can work with.

15 Q When did she tell you that?

16 A She told us the day that the books had come in.

17 Q Did she say anything about textbooks at the
18 beginning of the semester when she didn't have any?

19 A Yes. She said that we will eventually get
20 textbooks but she didn't know when.

21 Q Did she explain to you why you didn't have them
22 then at that time also?

23 A Yes. She said that there was a shortage on
24 textbooks.

25 Q Did she explain to you why there was a

1 Q Did you have tests in your 10th grade algebra?

2 A Yes.

3 Q Did you ever use the textbook for the test?

4 A As in what? Open book test?

5 Q No. To like prepare for the test did you ever
6 take a book home?

7 A Yes.

8 Q Do you know if other students did as well?

9 A I don't know.

10 Q Anything else that you used, like you told me
11 about the graphing board and the work sheets, anything
12 else that you used in your 10th grade algebra class?

13 A We used -- what she will do is she will get
14 this big roll of butcher paper and we will do an
15 assignment on that. It's a learning assignment. She
16 puts us in groups and then she gives each student a
17 problem to work on and then we have to use a format that
18 she gave us on how to work on the problem and we write
19 on the big butcher paper. And she will put it up on the
20 board so if anybody wants to come in and learn how to
21 do -- or want to know what we are learning, then they
22 will see it on the board and they will also see what
23 format she told us to use or the format we are learning
24 to do those problems.

25 Q Anything else?

- 1 A That's it. She also had us work on the
2 overhead projector, but that was like when we were going
3 over an assignment and she will ask if any students want
4 to show the class how to work out the problem; she will
5 tell us to go over to the overhead projector.
6 Q So that was used in class?
7 A Yes.
8 Q How about for your 9th grade English class, did
9 you have textbooks in that class?
10 A My 9th grade English class?
11 Q Let's do first semester first.
12 A Yes.
13 Q Were they literature books or what?
14 A Literature books.
15 Q How many, do you know?
16 A I don't know how many there were. You just
17 want in the class?
18 Q How many different types of literature books
19 did you use? Did you have like four or five?
20 A I had about three. But sometimes -- we had the
21 main literature book that we were reading and then we
22 had another book, like a book -- they were like "Romeo
23 and Juliet" or we will have "Animal Farm" or we will
24 have just like different types of books. It depends on
25 what we were working on at that time.

- 1 Q Were you able to take these books home?
2 A Yes.
3 Q What condition were the books in?
4 A The literature books, they were in pretty good
5 condition, like they were new.
6 Q This was all of the literature books that you
7 used in your 9th grade?
8 A Yes.
9 Q For second semester English in 9th grade did
10 you have the same books?
11 A Yes. We had the same literature books, but
12 then when I transferred to Mr. Camagian's class, then we
13 were working with the books by Maya Angelou or he would
14 copy poems and give us the copy of the poems. We were
15 working with -- I think -- yeah, that was it. That was
16 the only books that we were working with.
17 Q You could take those books home?
18 A Yes.
19 Q Do you know of anyone in the class that
20 couldn't take the books home?
21 A No.
22 Q Do you know if any of the books had writing in
23 them?
24 A No.
25 Q How about torn pages?

- 1 A No.
2 Q For your 10th grade English class did you have
3 books?
4 A Yes.
5 Q How many?
6 A As in how many did I take home?
7 Q How many books did you use in class?
8 A Did I use in class, two.
9 Q What were they? Like was one a main book and
10 then like another literature book?
11 A Yes. Because the main books, they have a
12 literature book for every grade level and it is made by
13 the same company, it is the same book except they
14 upgrade it for every grade level. And we used that book
15 and we used another book. We used "Catcher in the Rye."
16 Q Any other books in your 10th grade English?
17 A That's it.
18 Q Could you take those books home?
19 A Yes.
20 Q Do you know if anyone in the class couldn't
21 take them home?
22 A No.
23 Q What condition were those 10th grade books in?
24 A They were in good condition. They looked as if
25 they were new.

- 1 Q Any ripped pages?
2 A I think there was only one book that had a
3 ripped page and I think that was by accident.
4 Q Was the whole page ripped or the corner?
5 A Just the corner, something like that.
6 Q How about writing in the books?
7 A None that I saw.
8 Q Did you use anything -- let's go back to the
9 9th grade English. Did you use anything other than
10 literature books or the main literature book in your
11 class?
12 A 9th grade English, first or second semester?
13 Q Let's do first.
14 A First semester did we use anything else other
15 than books or --
16 Q Right. Did you have any projects where you had
17 to go to the library or use outside research?
18 A Yes.
19 Q How many projects?
20 A We had maybe about three. And the projects
21 that we did, they would take maybe a week or sometimes
22 it would take like a long time of study. So we will
23 probably -- it will probably be a project that we will
24 have to do for a month, but within that month we will
25 have another project that we can do in a week. And we

1 will watch videos. We would watch videos.

2 Q Do you know what kind of videos?

3 A After we finished reading "Romeo and Juliet,"
4 we watched the movie of "Romeo and Juliet," the original
5 movie, and then we watched the one that just recently
6 came out about two years ago. And basically the whole
7 point of that was just to compare it to the book and how
8 different they made it.

9 Q Anything else that you used?

10 A That's it.

11 Q For your projects, were these like research
12 projects or writing?

13 A Yes.

14 Q Did you have to use other resources?

15 A Yes. We had to use the library, Internet
16 sources.

17 Q Were you able to do that?

18 A Yes. Sometimes we will go to the library
19 because they had a computer lab there and they will take
20 us to the library. We will go maybe once a week.
21 Depending on how long the project is we will go once a
22 week during the time of the project and do some more
23 research.

24 Q Anything else besides the library or the
25 Internet?

1 A Usually we would -- he would put -- he will

2 write on the board what he wanted us to do. Write

3 different Spanish sentences on the board or something

4 like that. But the main goal was to get us to speak it,

5 so what he will do is we have to write dialogues in

6 Spanish. And, I mean, because the textbook he really --

7 he told us that -- he didn't tell us this, but I don't

8 think he liked to work with textbooks because the whole

9 thing was -- he told us in the beginning of the semester

10 his main goal was to speak Spanish. He said we are

11 going to do a lot, we are going to do dialogues in

12 Spanish. We had work sheets or we would copy problems

13 off the board.

14 Q Did he ever hand out materials to you like

15 handouts or work sheets?

16 A Yes.

17 Q What would those have on them?

18 A Spanish sentences such as conjugating a verb, a

19 Spanish verb, like filling in the blanks mostly.

20 Q Anything else that you used in class?

21 A We watched videos again. What else did we use?

22 We used tapes. He had audio tapes that we used.

23 Q Is there a language lab at Crenshaw?

24 A A language lab? I don't know anything about

25 it.

1 A It was basically up to us what we wanted to
2 use. So outside, like other than the computers and the
3 library, if we wanted to go home and do some more
4 research, go to the library or go to any other source,
5 then it was fine with your teacher. Sometimes we did
6 interviews of other people.

7 Q How about for your 10th grade English, did you
8 use any other resources besides the two books?

9 A Yes. Again the library. It was basically the
10 same thing. Sometimes our teacher would tell us instead
11 of using the book that the school gave us you might want
12 to -- she will encourage us to go buy a book from the
13 bookstore because a lot of times you will find the book
14 where it has the entire book but on the bottom of the
15 book. Some books have a brief explanation of the text
16 or something like that. So our teacher encouraged us to
17 go buy a book, the same book but with the explanation of
18 the text just so we could study it.

19 Q Anything else other than that?

20 A That's it. We watched videos.

21 Q For your 9th grade Spanish class, did you
22 have -- your first semester did you have a textbook?

23 A I really can't remember if we had a textbook.
24 No, we didn't have a textbook. No, we didn't.

25 Q Did you use anything in class?

1 Q Like a place where you can go and listen to
2 tapes or like a pronunciation of a word or something.

3 A As I far as I know, only the teachers can go
4 into the library. I think they had a language lab in
5 the library and they can check out videos there.

6 Q Anything else that you used in your Spanish
7 class?

8 A That's it.

9 Q How often did you have homework? This is 9th
10 grade first year.

11 A Every night.

12 Q What would that homework be?

13 A Sometimes we would have to do a research report
14 on a place in Mexico or interview somebody who speaks
15 Spanish or we have to do another dialogue, write
16 dialogues between two people, or he will give us a work
17 sheet and do it like that. And sometimes he will tell
18 us if we didn't finish the work in class, then finish it
19 for homework.

20 Q Did you have tests in Spanish?

21 A Yes.

22 Q How did you study for those?

23 A What he would do, after he finished correcting
24 our work he would give us back all of the work sheets
25 and at that time we had an opportunity to look at them

1 while we were at home. And that is basically it. Just
2 use our work sheets to study with. That way we could
3 remember what we did for that week because we had a test
4 every Friday.

5 Q Did you ever ask your teacher why you didn't
6 have a textbook?

7 A No.

8 Q Did you ever want one?

9 A Not really, because the way -- his teaching
10 method it was fine with me. His teaching method it was
11 real good. I mean nobody really asked for a textbook
12 because the way he was teaching it was as if we didn't
13 really need them.

14 Q Was that the same for your second semester in
15 your 9th grade year Spanish as well?

16 A Yes.

17 Q So you didn't have a textbook then?

18 A No.

19 Q How about Spanish, your 10th grade year, did
20 you have a textbook?

21 A Yes. But we could not take them home.

22 Q Do you know why not?

23 A I don't know. It was just a class set. What
24 she did is she put book covers on them and number them
25 so she could keep track of what books were missing and

1 Q Did you buy that yourself?

2 A Yes.

3 Q Now, there were Spanish dictionaries in the
4 library that you could use?

5 A In the library, the main library?

6 Q Yes.

7 A Yes.

8 Q How about in your Spanish class?

9 A Yes.

10 Q Could you take those home?

11 A No.

12 Q Could you take the Spanish dictionaries in the
13 library home?

14 A If we checked them out we could.

15 Q Did you ever do that?

16 A Yes. Like the first few weeks I did because I
17 didn't have a Spanish dictionary then. And then
18 afterwards I took that book back because by then I had a
19 Spanish dictionary already.

20 Q How often did you have homework in your 10th
21 grade Spanish class?

22 A Almost every -- well, it was actually only like
23 three times.

24 Q Only three times you had homework?

25 A Three times a week because it would be Monday

1 what books she would have.

2 Q Did you ever ask her if you could take the
3 textbook home?

4 A Yes.

5 Q How many times?

6 A Maybe about three times.

7 Q All semester three times?

8 A Yes.

9 Q What did she say?

10 A No.

11 Q Why did you want to take the textbook home when
12 you asked?

13 A So that way I could study for the test.

14 Q Did you use the textbooks during class?

15 A Yes.

16 Q What else did you use?

17 A We used the Spanish dictionary. She encouraged
18 us to go buy a Spanish dictionary. Most of the students
19 in the class had Spanish dictionaries. We used those.
20 We used three different kinds of Spanish dictionaries.
21 She had work sheets. We copied work off the overhead
22 projector. And we had -- that's about it. That's the
23 only thing we used.

24 Q Did you have a Spanish dictionary?

25 A Yes.

1 through Wednesday that we have homework and then that
2 Thursday the homework would be to study for the test and
3 then Friday we didn't have any homework.

4 Q Would you take the test on Friday?

5 A Yes. We had a test every Friday.

6 Q How would you study for the test?

7 A What she did was she gave us like these packets
8 and she had the day of the week on there and for a while
9 I was working on numbers. And she would give us math
10 problems in the Spanish class and instead of just
11 writing the answer, you have to write the answer and
12 then write it in Spanish and then the numbers --
13 whatever numbers that you worked with in the problems
14 you had to put those in Spanish too. And we will take
15 that home and they were always due on Friday. The whole
16 packet all together for the week was due on Friday. So
17 we had to turn that in on Friday, which is the day of
18 the test, which means we wouldn't need it anymore. And
19 then we had work sheets that she would pass back.

20 Q Anything else that you would use to study for
21 the test?

22 A The Spanish dictionary. And then sometimes on
23 Thursday she will tell us that we will have time to
24 study for the test.

25 Q In class?

- 1 A Yes.
- 2 Q Could you use the textbooks then?
- 3 A Yes. We could use the textbooks anytime during
- 4 class as long as we return them or unless she is giving
- 5 instructions during the time that the students would
- 6 like to use the textbooks. If she was teaching the
- 7 class and sometimes we would like to use the textbooks,
- 8 then she will tell us to wait until she finishes,
- 9 something like that.
- 10 Q You said that you wanted to take the textbook
- 11 home three times during the semester, right?
- 12 A Yes.
- 13 Q Why did you want to take the textbook home
- 14 then?
- 15 A Because then at first I was having somewhat
- 16 like a difficulty studying because the first semester I
- 17 had like my Spanish teacher -- I got an A in the class
- 18 but then I wanted to brush up on, you know, because I
- 19 knew Spanish -- my second year of Spanish is going to be
- 20 a little bit harder, it is going to be a little bit more
- 21 demanding. And so what I did, I wanted to take the book
- 22 home so I could refresh myself on what I learned the
- 23 first year in Spanish.
- 24 Q Were all of these three times towards the
- 25 beginning of the semester in the 10th grade, the first

- 1 semester in the 10th grade?
- 2 A Yes, I think it was all the first semester of
- 3 the 10th grade year.
- 4 Q Did you ask in September or was it throughout
- 5 the semester?
- 6 A It was throughout the semester.
- 7 Q Your textbooks that you had in your 10th grade
- 8 Spanish, were they in good condition?
- 9 A Yes.
- 10 Q Did any of them have writing in them?
- 11 A I wouldn't be able to describe the outside of
- 12 the book because all of them have book covers to protect
- 13 the outside of the book, but the inside, some of them
- 14 had writing in them, but it wasn't like really, really
- 15 bad.
- 16 Q How many do you think had writing in them?
- 17 A I really couldn't tell you because I use the
- 18 same book like all the time because we had numbers on
- 19 our seat so that when we did get one of the textbooks we
- 20 had to choose the textbook that had our number on it.
- 21 That way she could keep track of who the last student
- 22 was that used the textbook and if it came up missing she
- 23 would know what seat number.
- 24 But the book that I used there was very few
- 25 writing. Like I said, if you found writing in the book

- 1 it would be in the back because it is that one white
- 2 page. There was writing back there, but there were like
- 3 one or two torn pages but not completely torn out and
- 4 that was about it.
- 5 Q That was the book you used?
- 6 A Yes.
- 7 Q Do you know about any of the other textbooks?
- 8 A No. Wait. Let me rephrase that. There was
- 9 maybe about one or two where they actually had writing,
- 10 but again it was in the back of the book.
- 11 Q Those were the ones that you actually used in
- 12 the class?
- 13 A No. Those were two books that other people
- 14 used.
- 15 Q How did you know that?
- 16 A Because they showed me the book.
- 17 Q For your 9th grade Spanish did your teacher
- 18 ever tell you that he had purchased work sheets?
- 19 A For my 9th grade year of Spanish? He said a
- 20 few times that the printer was down or something like
- 21 that or he had to go buy a book to make copies out of it
- 22 or something like that.
- 23 Q Is that something he said to the whole class?
- 24 A Yes. Because sometimes he would give us work
- 25 sheets that we had to copy down what was on the work

- 1 sheet and we couldn't write on the work sheet.
- 2 Q Why couldn't you write on the work sheet?
- 3 A Either because -- I know at one time the
- 4 teachers told us there was a paper shortage in the
- 5 school so they couldn't make a lot of copies. They
- 6 would have to keep those copies.
- 7 Q Was this just in the Spanish class or others?
- 8 A It was other classes too.
- 9 Q Do you remember which ones?
- 10 A It was in Spanish. It was in sometimes health
- 11 because it was only a few times. It was like a few
- 12 times where we had to write out of -- I mean write off
- 13 the work sheet because most of the time we used our
- 14 book. Another class was -- let's see. There was a few
- 15 classes, but I can't remember what class it was.
- 16 Q Do you remember if it was your 9th grade year
- 17 or your 10th grade year?
- 18 A It happened in both years.
- 19 Q With the Spanish?
- 20 A What the Spanish? With the writing? What do
- 21 you mean by "With the Spanish"?
- 22 Q You said your Spanish teacher told you that he
- 23 had to purchase some work sheets?
- 24 A Um-hum.
- 25 Q Was that just in your 9th grade year?

- 1 A No. It was both years.
 2 Q How many times did your Spanish teacher tell
 3 you that in 9th grade that he had to purchase a work
 4 sheet?
 5 A In the 9th grade it was maybe about one or two
 6 times.
 7 Q That was all year?
 8 A Yes.
 9 Q Is that when he -- did he explain that because
 10 of the paper shortage in the school?
 11 A Yes.
 12 Q How about your 10th grade year, how many times?
 13 A 10th grade year in my Spanish class it happened
 14 almost every week.
 15 Q Every week your teacher would tell you that he
 16 had to purchase something, purchase a work sheet?
 17 A We had to copy a work sheet. We couldn't write
 18 on the work sheet.
 19 Q Why was that in your 10th grade year?
 20 A I guess because they couldn't make enough
 21 copies. They needed to collect those copies back to
 22 give to their other classes.
 23 Q How do you know that?
 24 A That is what they told us. They said they only
 25 have enough for all the classes. They don't have enough

- 1 A Yes.
 2 Q How many times?
 3 A Maybe about ten times.
 4 Q Did she explain to you why?
 5 A No.
 6 Q How about algebra, how many times?
 7 A For algebra it happened like on a weekly basis.
 8 Maybe about two or three times a week.
 9 Q That was you couldn't write on the work sheet?
 10 A Yes.
 11 Q Did your algebra teacher explain to you why?
 12 A No.
 13 Q How many times couldn't you write on the work
 14 sheet in world history?
 15 A For world history maybe about one or two times.
 16 Q Did your teacher explain why?
 17 A No.
 18 Q Other than when your teacher told you not to
 19 write on the work sheet, did any of your teachers tell
 20 you that they had to buy a work sheet with their own
 21 money?
 22 A No. The only thing they told us is that they
 23 needed those work sheets for their other class. That's
 24 the only reason we couldn't write on them because they
 25 needed those for their other classes. Now, for my

- 1 to pass around to everybody to make some more copies.
 2 Q Did they explain why they didn't have enough?
 3 A No.
 4 Q Did you ask?
 5 A No.
 6 Q Other than your Spanish class, did any other,
 7 either in 9th or 10th grade, did your teacher tell you
 8 that they had to buy a work sheet with their own money?
 9 A Yes.
 10 Q What other class?
 11 A My English class.
 12 Q This is English 9th or 10th grade?
 13 A 10th grade. My biology class 10th grade. My
 14 algebra class 10th grade. My -- it was sometimes, not
 15 all the time, maybe about one or two times my world
 16 history 10th grade.
 17 Q How many times did your 10th grade English
 18 teacher tell you that she had to buy a work sheet?
 19 A She didn't tell me she had to buy a work sheet.
 20 She had said don't write on the work sheet. That
 21 happened maybe one or two times.
 22 Q Did she explain to you why?
 23 A No.
 24 Q For biology, was this also you just couldn't
 25 write on the work sheet?

- 1 Spanish class in my 10th grade year, she told us that
 2 she had to buy her own work sheets.
 3 Q When did she tell you that?
 4 A She told us -- it was sometime during the first
 5 semester, like close to the beginning when she first
 6 came, maybe about the second week she was there.
 7 Q Did she tell you why?
 8 A She just told us that she had to buy her own
 9 work sheets.
 10 Q But she didn't tell you why she had to buy
 11 them?
 12 A No.
 13 Q Did she tell you if she had been reimbursed by
 14 the school?
 15 A No, she didn't tell us.
 16 Q How many times did she say that?
 17 A She said it maybe about once or twice.
 18 Q Do you remember why she told you that in class?
 19 A No.
 20 Q Other than everything we just talked about, is
 21 there any other time you remember a teacher telling you
 22 that they had to buy a work sheet for class?
 23 A No.
 24 Q Any other time you remember a teacher telling
 25 you they had to buy any supplies for class?

1 A Not my teacher personally, but Ms. Smith, she
2 told me she had to buy her own textbooks.
3 Q Who is Ms. Smith?
4 A She is another algebra teacher. I'd been to
5 her class a couple of times.
6 Q Did you go to her class in 9th grade or 10th
7 grade?
8 A In 10th grade.
9 Q Why did she do that?
10 A Because my brother was upstairs and I was going
11 to talk to him.
12 Q And she told you she had to purchase textbooks
13 for her class?
14 A She was talking about it during the time.
15 Q She was talking about it to her class?
16 A Yes.
17 Q Do you remember what she was saying?
18 A No. All I remember she was saying -- because I
19 had just walked in. She was talking about how she --
20 something about somebody is not paying her enough or
21 something like that. That she can't afford to buy her
22 own textbooks when the school should be providing them.
23 Q Was she talking to the class?
24 A Yes.
25 And my biology teacher also.

1 Q For Ms. Smith did you ever ask her about it?
2 A No.
3 Q Do you know if she was ever reimbursed by the
4 school?
5 A No.
6 Q Was this your brother's algebra teacher?
7 A Yes.
8 Q Do you know if he ever asked her?
9 A He told me he asked her about it. Because
10 Ms. Smith was kind of angry and I asked my brother why
11 was she mad and he told me. And I said, yeah, that's
12 what I heard her saying. And that was the end of the
13 conversation.
14 Q And you said your biology teacher also had to
15 buy books?
16 A Yes. She also had to buy by her own science
17 supplies, but I guess books are included with the
18 science supplies.
19 Q Is this what we talked about earlier, she had
20 to buy like some glass slides and stuff?
21 A Yes.
22 Also I forgot to tell you for my 9th grade year
23 I had Mr. Hill for the first semester and for the second
24 semester I had Ms. Harris.
25 Q For science?

1 A Yes. H-a-r-r-i-s.
2 Q So other than Ms. Smith and Ms. Coreley buying
3 the supplies for the class, any other teachers that you
4 know of that had to buy books or supplies for the class?
5 A That's it. That's all I know.
6 MS. VANSE: Okay. I think we are done for
7 today.
8 MS. LHAMON: Thanks very much.
9 THE WITNESS: I have a question about the
10 document here.
11 BY MS. VANSE:
12 Q For me or your attorney?
13 A For you. I wanted to know about the second
14 page where it says "To Plaintiff D'Andre Lampkin." It
15 has my name here, but then it has my brother for the
16 deposition. So I wanted to know if you guys made a
17 mistake or what.
18 Q For the record you are looking at Exhibit 1,
19 the first document that I handed you today?
20 A Yes. It's located on page 2.
21 Q And it says -- it's noticed of D'Andre. And
22 then it says "Notice is hereby given that the deposition
23 upon oral examination of Delwin"?
24 A Yes.
25 Q Yes. That does look like it was a typo error.

1 I apologize.
2 MS. VANSE: May we stipulate copies of the
3 documents attached to the deposition may be used as
4 originals?
5 MS. LHAMON: Yes.
6 MS. VANSE: May we stipulate that the original
7 of this deposition be signed under penalty of perjury
8 and be delivered to the offices of the ACLU?
9 MS. LHAMON: Yes.
10 MS. VANSE: That the reporter is relieved of
11 liability for the original of the deposition;
12 That the witness will have 15 days from the
13 date of the court reporter's transmittal letter to the
14 ACLU to sign and correct the deposition.
15 And the ACLU will notify us of any changes up
16 until that time?
17 MS. LHAMON: That's fine except that we will
18 request that there will be 30 days and we will do our
19 best to get it back within 15 days. But because of the
20 boys' work schedule and class schedule and their
21 mother's work schedule we would like to have a 30-day
22 time period.
23 MS. VANSE: I thought it was stipulated that it
24 was going to be an expedited return time.
25 MS. LHAMON: We will do our best to meet the

1 return time, but we would like to stipulate to 30 days.
 2 MS. VANSE: I'm just not sure if I have kind of
 3 the authority. I am not sure of what is in place. I
 4 don't know if I can agree to that, but if you need more
 5 time, I'm sure we can work it out.
 6 MS. LHAMON: Just so you know, your co-counsel
 7 in other depositions have stipulated to 30 days.
 8 MS. VANSE: If that's true, then I have no
 9 problem with that.
 10 MS. LHAMON: And we will do our best to get it
 11 done in 15.
 12 MS. VANSE: That sounds fair.

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: _____

 JACQUIE NEMOR
 CSR No. 4834

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 8
 9 I, D'ANDRE DeVON LAMPKIN, do hereby declare
 10 under penalty of perjury that I have read the foregoing
 11 transcript of my deposition; that I have made such
 12 corrections as noted herein, in ink, initialed by me, or
 13 attached hereto; that my testimony as contained herein,
 14 as corrected, is true and correct.
 15 EXECUTED this _____ day of _____,
 16 20_____, at _____,
 (City) (State)

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 D'ANDRE DeVON LAMPKIN
 Volume 1