

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 27, 2001
Volume 2

Reported by:

JACQUIE NEMOR

CSR No. 4834

JOB No. 847907

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)
 11 EASTIN, State Superintendent)
 12 of Public Instruction, STATE)
 13 DEPARTMENT OF EDUCATION,)
 14 STATE BOARD OF EDUCATION,)
 15)
 16 Defendants.)

17 Deposition of D'ANDRE DeVON LAMPKIN,
 18 Volume 2, taken on behalf of Defendant
 19 State of California, at 400 South Hope
 20 Street, Los Angeles, California,
 21 beginning at 9:40 a.m. and ending at
 22 5:12 p.m. on Sunday, May 27, 2001,
 23 before JACQUIE NEMOR, Certified Shorthand
 24 Reporter No. 4834.
 25

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 Volume 2

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 25

1 Los Angeles, California, Sunday, May 27, 2001
 2 9:40 a.m. - 5:12 p.m.
 3

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

8 EXAMINATION

9 BY MS. VANSE:

10 Q D'Andre, do you remember the ground rules that
 11 I stated at the beginning of your deposition last week?

12 A Very roughly. But it will be very helpful if
 13 you repeat them.

14 Q Our reporter is going to be recording my
 15 questions and your answers into a booklet that you will
 16 review at the end of -- well, when you receive it. When
 17 you receive that booklet you can make changes that you
 18 feel are necessary but the various lawyers in this case
 19 will be able to comment on any changes that you make at
 20 that time. Do you understand that?

21 A Yes.

22 Q It's very important that you respond to my
 23 questions as fully and as fairly as you possibly can.
 24 Do you understand that?

25 A Yes.

1 Q When you answer my questions it's important
2 that you verbalize your answers and don't nod or shake
3 your head or say "Uh-uh" or "Uh-huh" so that the court
4 reporter can record those answers. Do you understand
5 that?

6 A Yes.

7 Q It's also important in order to get a clear
8 record that only one person speaks at a time. So I ask
9 that you allow me to finish my questions before you
10 answer and I in turn will allow you to finish your
11 answer before I ask another question. Do you understand
12 that?

13 A Yes.

14 Q It's very important that you listen carefully
15 to the questions. If you don't hear it or you don't
16 understand it, please let me know and I'll make an
17 effort to rephrase it. If you don't indicate that you
18 haven't heard or don't understand, I will presume that
19 you have understood the question. Do you understand
20 that?

21 A Yes.

22 Q You are required to answer my questions to the
23 best of your ability, but if you don't know the answer I
24 don't want you to guess. However, we are entitled to
25 your best estimate when you can provide one. Do you

1 Q Do you have any questions?

2 A No.

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

5 A No.

6 Q Have you recently consumed any medication,
7 alcohol, or any other substance that clouds your mind or
8 would interfere with your ability to understand my
9 questions?

10 A No.

11 Q Other than your attorneys, did you speak to
12 anyone about your deposition last week?

13 A Yes.

14 Q Who did you speak to?

15 A My mother.

16 Q How many times did you talk with her?

17 A Maybe only once. Once.

18 Q When was that?

19 A That was the time after the deposition.

20 Q So last Sunday?

21 A Yes.

22 Q What did you talk about?

23 A We just talked about when the next deposition
24 is going to be and different questions I was asked at
25 the deposition.

1 understand that?

2 A Yes.

3 Q Because your testimony will be given under oath
4 it will have the same force and effect as if you were
5 testifying in a court of law. You are therefore subject
6 to all the penalties for perjury for giving false
7 testimony. So even though this is a more informal
8 setting, it will still have the same effect as if you
9 were testifying in a formal courtroom setting. Do you
10 understand that?

11 A Yes.

12 Q If you do need a break for whatever reason let
13 me know and I will instruct the court reporter that we
14 are off the record and we will take a break. If I've
15 asked you a question, I do ask that you answer the
16 question before taking a break. Do you understand that?

17 A Yes.

18 Q If at any point during today's deposition a
19 question I ask or an answer that you are giving triggers
20 your memory concerning something that we've talked about
21 earlier in the deposition, please tell me that and we
22 will get it on the record. If not, we will assume that
23 the answers you give today are full and complete. Do
24 you understand that?

25 A Yes.

1 Q Anything else?

2 A No.

3 Q Other than your mom did you speak to anyone
4 else about your deposition last Sunday?

5 A Yes.

6 Q Who?

7 A My brother.

8 Q When did you speak with him about your
9 deposition last week?

10 A Sunday.

11 Q Any other time?

12 A No.

13 Q What did you talk about?

14 A The time period that we had -- the time I spent
15 in the deposition. And that's about it.

16 Q What do you mean by "time period"? How much
17 time?

18 A Yes.

19 Q Did you discuss any of the questions that you
20 were asked or the answers that you gave?

21 A I discussed the questions that I was asked but
22 none of the answers.

23 Q What did you tell him?

24 A I just told him the questions that he might
25 want to -- he should expect to be asked.

- 1 Q Did he say anything to you? Or ask you any
2 questions about the deposition?
3 A Other than the questions, that's it.
4 Q But when you told him what questions you've
5 been asked, did he have any questions for you?
6 A Yes.
7 Q What were those?
8 A Just questions like what do I mean by the
9 questions I was asked. He wanted me to rephrase some of
10 the questions I was asked.
11 Q Did you discuss any of the conditions in your
12 school that you put in your declaration?
13 A No.
14 Q Anyone else other than your mother and your
15 brother that you discussed your deposition with?
16 A No.
17 Q Did you prepare for today's deposition?
18 A No.
19 Q Did you review any documents in preparation for
20 your deposition today?
21 A No.
22 Q Last time we were here I started asking you
23 about some of your classes --
24 A Yes.
25 Q -- and I'm going to continue on with the rest

- 1 of those that I didn't get to cover last week.
2 In your 9th grade you were in an education and
3 career planning class, right?
4 A Yes.
5 Q Can you tell me a little bit about what that
6 class is about?
7 A What do we do in the class?
8 Q Yes. Like what do you learn?
9 A Well, the main goal of the class is to get an
10 idea of what you want to do as far as your career, your
11 career goals, and they taught us how -- the teacher or
12 the substitute taught us how to fill out resumes and --
13 how to fill out different business documents as far as
14 how to get the job or placement for the job.
15 Q Is this a required class?
16 A Yes.
17 Q Did you have a textbook?
18 A Yes.
19 Q What was -- do you know what it was called?
20 A No. I can't remember.
21 Q Did you use anything else other than a textbook
22 in class?
23 A No.
24 Q Any other projects?
25 A We had projects, which is creating a complete

- 1 resume.
2 Q Anything else?
3 A That's it.
4 Q Did you have homework?
5 A No.
6 Q Did you receive grades in the class?
7 A Yes.
8 Q How did you receive the grades?
9 A We received the grades based on the projects
10 that we got -- we got an overall grade from the projects
11 we did and our classwork participation. And we also had
12 an oral interview as our final. An oral interview was
13 for -- was about -- it was basically a job interview.
14 So it was like a mock job interview and that was used as
15 a basis for our final, for our final grade.
16 Q How many projects did you do in that class?
17 A It was only about maybe two. The rest of the
18 work was done in class. Those weren't -- the rest
19 weren't really projects. They were more like ongoing
20 classroom assignments.
21 Q What would you use the textbook for?
22 A We used the textbook for the part where we
23 learn how to fill out a resume. And it also gave a
24 description -- every chapter gave a description of a
25 different job. And we would do section reviews as far

- 1 as reviewing the chapter, answering the questions for
2 the review of the chapter.
3 Q Did you have your own copy of the textbook to
4 use in class?
5 A My own copy as in?
6 Q Did you have to share a textbook in class or
7 did have your own to use in class?
8 A Textbook?
9 Q Right.
10 A I had my own textbook.
11 Q Could you take that home?
12 A Yes.
13 Q What was the condition of the textbook?
14 A It was pretty -- it had a lot of writing in it
15 and you could tell it was an old textbook.
16 Q How could you tell it was old?
17 A Because of the condition it was in as far as
18 the cover and the film on the top of the textbook.
19 Q What do you mean by "film"?
20 A As in like dirt that wouldn't come off. Stuff
21 that wouldn't clean off the top of the textbook.
22 Q Did you ever look at the date of the textbook
23 inside?
24 A No.
25 Q Where was the writing that you saw on the

1 textbook?

2 A It was on different pages. I didn't really
3 get -- it was within the book on the back and on the
4 front, but as far as the pages specifically I don't
5 know.

6 Q Were any of the pages missing or torn?

7 A No. Not in the book that I had.

8 Q Do you know if any of the other students' books
9 had missing --

10 A No.

11 Q -- or torn pages?

12 MS. LHAMON: D'Andre, remember to let her
13 finish her questions before you answer. Thanks.

14 BY MS. VANSE:

15 Q This was the class that you had several
16 substitutes in, correct?

17 A Yes.

18 Q Do you know why you had the substitutes instead
19 of Mr. Patrick? I think that was your teacher, right?

20 A Yes.

21 Q Do you know why you had the substitutes instead
22 of Mr. Patrick?

23 A Originally the class was told that Mr. Patrick
24 wouldn't be in and then -- well, he wouldn't be in for
25 the first part of the semester. And then time -- it was

1 book. There weren't any special projects or anything
2 that we had to do.

3 Q When Mr. Patrick taught the class, how would he
4 teach the class?

5 A When he taught the class we will do most of the
6 projects that were in the book or he would have projects
7 of his own that he wanted us to do.

8 Q Do you know if he ever gave projects to the
9 substitutes to have you do while he was gone?

10 A No.

11 Q How about the second substitute that you had,
12 how long did that substitute last?

13 A The substitute closest to the end of the
14 semester?

15 Q Right.

16 A Substitutes for the end of the semester, they
17 varied. Sometimes they would stay maybe one or two days
18 and then they will leave and then we will have another
19 substitute.

20 Q What kind of work would they have you do?

21 A Most days we didn't do any work. Other days we
22 would do crossword puzzles.

23 Q If you didn't do any work, what would you do in
24 class?

25 A Sometimes they will bring in a television, we

1 over a period of time where we had -- we had the same
2 substitute from the beginning and then eventually
3 Mr. Patrick did come in. And then after -- I'd say
4 about a month before school ended for that semester, he
5 stopped coming again.

6 Q Do you know why he stopped coming in?

7 A No. When I was in the 10th grade I did see him
8 again and then he told me he was sick. He became very
9 ill. But as far as me being told before he left or
10 during the time period I was in his class, I never knew.

11 Q So he told you this in 10th grade, that he had
12 been sick during your 9th grade year?

13 A Yes.

14 Q Your first substitute that you had in the
15 class, you had that substitute for how long?

16 A Maybe about five weeks.

17 Q It was the same substitute, right?

18 A Yes.

19 Q What did you learn with that first substitute?

20 A Basically what she did is she just went through
21 the book. She didn't really -- she would go through the
22 book and then when it was time to do a section review
23 for the chapter, then she will write the question on the
24 board and then we will just answer the questions
25 basically. So basically we're doing work throughout the

1 will watch TV or watch a video. Or other times we will
2 just sit and talk, everybody will just sit and talk.

3 Q The television or video, was that something
4 related to the class?

5 A No.

6 Q What was it? Was it just regular shows or --

7 A It was movies that recently came out or movies
8 that related to -- I know we watched a video of the
9 Great Depression. It was like a documentary. Most of
10 the time we will watch documentaries.

11 Q How many times did you watch TV or a movie in
12 this class?

13 A During what time period?

14 Q During your first semester.

15 A The first semester?

16 Q Yes. Of your 9th grade year.

17 A I really can't remember. I can't remember.
18 But it was only a few times. It wasn't a lot.

19 Q Anything else besides TV or video that you
20 would do during the education class if you didn't do
21 coursework?

22 A No.

23 MS. LHAMON: He has testified that they also
24 talked in class.

25 THE WITNESS: Talked in class.

1 BY MS. VANSE:
 2 Q How many times did you just talk in class?
 3 A I can't remember. But it was a lot. During
 4 the time period when we had the substitute close to the
 5 end of the semesters, it was a lot of times when the
 6 class would just sit and talk.
 7 Q Do you know about how many times -- did you
 8 have the class every day?
 9 A Yes.
 10 Q How many times a week during that --
 11 A How many times a week? Maybe about three times
 12 a week, three or four times a week.
 13 Q Would you talk for the entire class?
 14 A Yes.
 15 Q What would the teacher do?
 16 A He will just sit at the desk, read his
 17 newspaper.
 18 Q What did you think about that?
 19 A That the teacher didn't have any work for us or
 20 they didn't care if we did any work.
 21 Q Did you ever talk to anyone about that?
 22 A I talked to the assistant principal and my
 23 principal.
 24 Q When did you talk to the assistant principal?
 25 A It was during the -- I remember I talked to him

1 the first time Mr. Patrick wasn't there; and that is
 2 when he told me Mr. Patrick wasn't going to be in for
 3 the first part of the semester but eventually he will
 4 come in. But during the end of that semester I think I
 5 talked to him about -- no, I didn't talk to him at all.
 6 Q So just once during the beginning of the
 7 semester?
 8 A Yes.
 9 Q When did you talk to your principal?
 10 A I talked to my principal maybe about the second
 11 week into school, into that semester.
 12 Q Any other time?
 13 A No.
 14 Q What did you talk to your principal about?
 15 A I talked to him about -- I just asked him
 16 basically why wasn't the teacher there and will we have
 17 the same substitute for the entire time while
 18 Mr. Patrick was gone. And the answer was yes.
 19 Q During the beginning of the semester were there
 20 any class times that you just talked or watched movies?
 21 A No.
 22 Q Did you talk --
 23 A There was -- it was only one time that we
 24 watched a video while we had the substitute in the
 25 beginning of the semester.

1 Q Is that one time total or just one time at the
 2 beginning of the semester?
 3 A One time at the beginning of the semester while
 4 we had the substitute that was there for about five
 5 weeks.
 6 Q What was that video on, do you remember?
 7 A I can't remember the name of the video -- I
 8 mean the movie, but it was about Southern heritage.
 9 Q Did you talk to anyone at the end of the
 10 semester about your class?
 11 A No.
 12 Q Did you like the class better when Mr. Patrick
 13 was there?
 14 A Yes.
 15 Q What did you like better about it?
 16 A The mock interviews that we did and the resumes
 17 they had us do.
 18 Q Anything else?
 19 A That was it.
 20 Q Did you know any other students who were in
 21 that class maybe with a different teacher?
 22 A Can you clarify that question?
 23 Q Sure. Did you know any other students at
 24 Crenshaw who took the education and career planning
 25 class but they didn't have -- they had a different

1 section or were assigned to a different teacher?
 2 A Yes.
 3 Q Did you ever talk to them about their class?
 4 A No.
 5 Q You took health instead of education and career
 6 planning in your 9th grade year, right?
 7 A No. Education and career planning came for the
 8 first semester of my 9th grade year and health came for
 9 the second semester of my 9th grade year.
 10 Q What did you learn in your health class?
 11 A We learned about hygiene and human anatomy and
 12 physical fitness.
 13 Q Did you have a textbook in health?
 14 A Yes.
 15 Q Was it just one or did you have several
 16 textbooks?
 17 A We just had one.
 18 Q Did have your own copy of the textbook or did
 19 you have to share it in class?
 20 A Sometimes we -- well, I didn't have to share my
 21 textbook in class.
 22 Q Did other students have to share theirs?
 23 A Sometimes.
 24 Q Do you know why?
 25 A No.

- 1 Q Were you able to take your textbook home?
 2 A No.
 3 Q Did you want to take your textbook home?
 4 A Yes.
 5 Q Why did you want to take it home?
 6 A Because there were some parts in the section
 7 review that we did in class that sometimes I wasn't able
 8 to finish and I wanted to finish those sections at home.
 9 Q Did you talk to your teacher about why you
 10 couldn't take it home?
 11 A Yes. He told me it was a shortage on the
 12 books, and a lot of the teachers, other health teachers,
 13 didn't even have textbooks and they were working out of
 14 different books. So you had to keep those -- a copy of
 15 the books that he had in his classroom inside of the
 16 classroom for his other classes also.
 17 Q Did he tell you anything else?
 18 A No.
 19 Q Did you talk to anyone else about why you
 20 couldn't take your health book home?
 21 A Yes.
 22 Q Who?
 23 A One of my friends that sit behind me.
 24 Q What did you guys talk about?
 25 A We just talked about -- sometimes we studied

- 1 A No.
 2 Q Other than the textbook did your teacher use
 3 any other materials in class?
 4 A Sometimes we used work sheets.
 5 Q Anything else?
 6 A No.
 7 Q Did you ever do any projects outside of class?
 8 A Yes. Sometimes we had -- well, projects
 9 outside of class that we had to do at home or --
 10 Q Well, I guess we can start there. Like any
 11 projects that you had to do outside that you had to do
 12 at home?
 13 A We had to do a physical fitness test.
 14 Q Anything else?
 15 A That's it.
 16 Q Any other projects that you had to do outside
 17 of class maybe at school?
 18 A The part -- well, part of the physical fitness
 19 test that we did at home was a follow-up to another
 20 physical fitness test that we did on the PE field.
 21 Q Anything else?
 22 A That's it.
 23 Q Did you receive a grade in health?
 24 A Yes.
 25 Q How were you graded?

- 1 together and so sometimes we talked about like how we
 2 wanted to take the textbook home so we could study from
 3 the textbook. And a lot of times we wanted to do the
 4 work during lunch or nutrition in the library, but we
 5 couldn't do that because we couldn't take the textbooks
 6 out of the classroom.
 7 Q Anyonc else that you talked about it with?
 8 A No.
 9 Q What was the condition of your textbook like?
 10 A It had writing in it. Some pages had writing
 11 in it. Well, some pages had parts where it was written
 12 in. Some pages, only a few, though, were torn out.
 13 Q Was that the entire page or just a portion of
 14 the page?
 15 A Just a portion of the page.
 16 Q Where was the writing in the book that you saw?
 17 A In the back and the front and then again in
 18 various pages within the book.
 19 Q What would the writing be?
 20 A Sometimes it would be gang writing and
 21 sometimes it would be just notes. Sometimes you will
 22 see check marks in the book on different pages of the
 23 section review.
 24 Q Do you know about how many pages had writing on
 25 them?

- 1 A As in?
 2 Q What would the teacher look at to give you a
 3 final grade?
 4 A The work that I turned in and the physical
 5 fitness test, because the physical fitness test was a
 6 final project for our final grade.
 7 Q What was the work that you turned in?
 8 A Section reviews. Sometimes it was charts and
 9 graphs that we had to do within the class.
 10 Q Anything else?
 11 A That's it.
 12 Q Did you have a test?
 13 A Yes.
 14 Q How many?
 15 A We had a test every other Friday.
 16 Q Did you have a final exam?
 17 A Yes. And that was the physical fitness test.
 18 Q How would you study for the test?
 19 A I would take all my section reviews and I would
 20 just go over what the section reviews are talking about,
 21 and I will analyze the question and see if I answered
 22 the question correctly and that way I will be able to
 23 use that as a way of knowing the answers that might be
 24 on the exam or the test.
 25 Q Anything else you did to study for the test?

- 1 A No.
 2 Q Would you have used the textbook at home to
 3 study for the test?
 4 A No. Because we could not take the textbooks
 5 home.
 6 Q Right. If you had been able to take the
 7 textbook home, do you think you would have used it to
 8 study for the test?
 9 A Yes.
 10 Q How would you have used it?
 11 A I could look at the charts and the graphs and
 12 the diagrams, because a lot of times the diagrams would
 13 be brought back up in the test. So that would be a good
 14 way for me to study, to analyze the diagrams.
 15 Q How often did you have homework in health?
 16 A In health we rarely had homework other than the
 17 physical fitness test.
 18 Q For your 9th grade science class you had two
 19 different teachers that year, didn't you?
 20 A No.
 21 Q Just one?
 22 A Yes.
 23 Q Was that Mr. Hill or Mr. Harris?
 24 A Oh, okay. I did have two teachers -- yeah, I
 25 had two teachers that 9th grade year. I had Mr. Hill

- 1 A No.
 2 Q Do you know if it was something that the
 3 teachers did or the students put the book covers on?
 4 A The book covers, a lot of them were taken off.
 5 Some of them were taken off. And the ones that were
 6 still on -- it is just that the teacher never really
 7 cared about, you know, replacing the textbooks -- not
 8 replacing the textbooks, replacing the book covers. It
 9 wasn't really a big deal about replacing the book covers
 10 because the students had to replace them on their own.
 11 And some students just decided not to replace the book
 12 cover.
 13 Q Did you use anything else for the science class
 14 other than a textbook?
 15 A As in?
 16 Q Did you have a workbook or did you do
 17 experiments in class?
 18 A Yes.
 19 Q What else did you use?
 20 A Different science materials such as test tubes
 21 or petrie dishes. We will use newspaper articles to do
 22 our current events.
 23 Q Anything else?
 24 A We will use, other than that, as far as the
 25 experiments, our teacher will just go buy different

- 1 for the first semester and Ms. Harris for the second
 2 semester.
 3 Q For the first semester was there any other
 4 description to the science class? Did it have another
 5 name?
 6 A It was just integrated science.
 7 Q What did you learn your first semester?
 8 A The first semester we did different projects
 9 dealing with water tests, diluting water, and finding
 10 different bacteria in the water.
 11 Q Did you have a textbook your first semester for
 12 science?
 13 A Yes.
 14 Q Could you take that textbook home?
 15 A Yes.
 16 Q What was the condition of your textbook like?
 17 A It was the same as the rest. It had writing in
 18 the middle and the back and the front. Outside I really
 19 didn't look at it because it had a book cover on it.
 20 And so, like what the thing with the textbook with the
 21 book covers, nobody really took them off because they
 22 were the same book covers that were on there the
 23 previous year.
 24 Q Do you know why some books had covers and some
 25 books didn't?

- 1 supplies that related to the science project such as
 2 Kool-Aid, for example. You have to dilute water. He
 3 will go to I guess it was a bake shop where you get
 4 algae, and he picked up algae water. We used different
 5 compound materials such as -- what is it called? It was
 6 some kind of salt made to -- to be used to make soap or
 7 bath salt. And we used that in different experiments.
 8 Q Anything else?
 9 A That's it.
 10 Q Did you use any work sheets in class?
 11 A Very rarely. And that was only to -- it was
 12 for maps or charts and graphs.
 13 Q Were the newspaper articles with current
 14 events, were these current events dealing with science?
 15 A Yes.
 16 Q How often would you use your textbook in class?
 17 A We used it maybe about once or twice a week.
 18 Because usually on those days, they are usually like on
 19 a Monday or a Tuesday, because what we will do is we
 20 will use textbooks on a Monday and a Tuesday. And then
 21 that will lead up to a project that we are going to do
 22 that following Wednesday, Thursday, or Friday. And then
 23 usually on Fridays there was a test.
 24 Q Did you have a different project every week?
 25 A Yes. Well, it also depended on how long the

1 project was supposed to take because sometimes it will
2 take one week and other times it will take two weeks.

3 Q Did you receive a grade in science?

4 A Yes.

5 Q How were you graded in science?

6 A Based on how many current events I turned in,
7 if I turned in all of my assignments, and how well I did
8 on the projects, on the experiments.

9 Q Any tests?

10 A I told you that we took tests on Fridays.

11 Q Would that just be for the project or were
12 there separate tests?

13 A The tests would lead up to our grade and the
14 tests will be related to the experiment.

15 Q Anything else that you were graded on?

16 A We also had a project where we went to go
17 measure the baseball field and that was part of your
18 final grade also.

19 Q Anything else?

20 A That's it.

21 Q Were the projects something that you did
22 outside of class or that you finished in class?

23 A They were all finished in class.

24 Q Did you have any work that you had to take home
25 to do?

1 would do essays. We had a lot of essays -- not a lot,
2 maybe one or two essays to do during the end of the
3 semester. And the reason why those were -- they were
4 real big essays because a lot of times they were
5 five-page essays.

6 MS. LHAMON: Counsel for the District is
7 laughing that those are big.

8 THE WITNESS: For 9th grade, those are big for
9 your first year of high school.

10 BY MS. VANSE:

11 Q Anything else that you would do besides the
12 videos and essays?

13 A We would do experiments. What we will do, she
14 would have these -- we would look at core data. It was
15 some experiment called a core data experiment or
16 something like that. It was basically to analyze an
17 animal and use this -- it was some kind of theory made
18 by a scientist and we had to look at the scientific name
19 and the species and break down the genus and everything
20 of the species. All we had to do was analyze and write
21 down the characteristics. And we also had to do an
22 archaeological dig project.

23 Q Anything else?

24 A That's it.

25 Q Did you have a textbook?

1 A Sometimes we will work out of our textbooks at
2 home, but that was rare, too. That was like every now
3 and then. If we had to answer questions before doing
4 the experiment, then he will let us take the textbook
5 home to answer the questions and then we could bring it
6 in the next day. Because sometimes he will figure that
7 we didn't have enough time to answer the questions and
8 do the experiment all in one day. So he will tell us to
9 work in our textbooks the day before we do the project
10 so that we will be one step ahead. And then we also had
11 to do the current events.

12 Q Anything else?

13 A That's it.

14 Q How about the second semester of your freshman
15 year, what was that science class like?

16 A The second semester our teacher was preparing
17 us for biology and she was -- the main purpose of that
18 is to -- eventually when we go on to biology. She
19 wanted to also prepare us for AP biology.

20 Q How would she prepare you?

21 A We would watch a video or a movie. And all the
22 movies and the videos would be related to science. And
23 a lot of times we would take notes down and then we
24 would analyze how the movie is related to science and
25 basically just do an analysis of the movie. And we

1 A No.

2 Q Do you know why you didn't have a textbook?

3 A Our teacher told us the reason she didn't give
4 us a textbook was because most of the time we wouldn't
5 be using it. There were textbooks in the classroom and
6 there were different sets of textbooks in the classroom.
7 And what she did was she told us if we need any
8 information out of the textbook we were free to use the
9 textbook, but we just couldn't take them home.

10 Q Did you ever want to take the textbook home?

11 A Yes.

12 Q Why?

13 A Especially with the archaeological dig project,
14 the main purpose of that was to make an environment.
15 You could make the environment however you wanted to
16 make it, but you had to make sure that it had to make
17 sense. You had to have an explanation as to why you
18 made the environment the way it was. And part of that
19 project was to do a little bit of research on how to
20 form an archaeological dig. And I did eventually -- I
21 found a book that she had that I wanted to use, but I
22 couldn't take it home because it was a new book. It was
23 a very new book.

24 Q So what did you do instead?

25 A I went to the library that is located near

1 where I live.

2 Q Any other time that you wanted to use a
3 textbook at home?

4 A For the core data project.

5 Q Why did you want to use it then?

6 A Because she encouraged me to find out more
7 information on it. But the books she had, they were old
8 and outdated and she said that might not be the correct
9 information that I was looking for. So when I was
10 looking through the book, it wasn't information I was
11 looking for so I eventually had to go to the library
12 again and find the material I was looking for then.

13 Q For the core data project, was that something
14 that you did or was that something that the class was
15 working on?

16 A It was something that the whole class was
17 working -- the entire class was working on.

18 Q The textbooks that your teacher had in the
19 class, were those general -- if you know, were they
20 general science like reference books or were they actual
21 textbooks like you would see in a class?

22 A Some of them were general science textbooks
23 where it was just basically a book on science. There
24 were other books where there were textbooks like regular
25 textbooks that were on a specific topic, such as a

1 or wanted to take a textbook home, were they for the
2 same projects or different projects?

3 A A lot of times it was for the same projects.

4 Other than them wanting to take a textbook home for our
5 projects, I don't know if they wanted to take a textbook
6 home for another project that they were doing on their
7 own or another work assignment that they were doing. I
8 don't know if they wanted to take the textbook home
9 then.

10 MS. VANSE: Do you want to take a break?

11 MS. LHAMON: Do you want to?

12 THE WITNESS: Yes.

13 (Recess from 10:28 a.m. to 10:33 a.m.)

14 THE WITNESS: I also wanted to add to the
15 question that you asked me the first time: Who did I
16 speak to about the deposition? I remembered that I did
17 speak to another -- one of my friends. Cindy Diego.
18 C-i-n-d-y, Diego, D-i-e-g-o.

19 BY MS. VANSE:

20 Q Is this the Cindy Diego that is also a
21 plaintiff in this case?

22 A Yes.

23 Q When did you talk with her?

24 A I talked with her on Tuesday.

25 Q What did you talk about?

1 biology textbook. And there were -- we used other
2 things like a thesaurus or an atlas or a dictionary that
3 she had in her cabinets.

4 Q Do you know if any other students wanted to
5 take a textbook home in that class?

6 A Yes.

7 Q Who?

8 A Names specifically?

9 Q How many people that you know of?

10 A About maybe five other students.

11 Q How do you know they wanted to take a textbook
12 home?

13 A Because a lot of times they worked in my group.
14 Because we had groups in the -- well, whenever we had to
15 do a group project, there was always a group that worked
16 together. And I had this group where I always worked
17 with them on different projects. And we all asked the
18 teacher if we could take the textbook home or we would
19 talk about taking the textbook home to do further
20 research on the project.

21 Q Were there any other times that you wanted to
22 take a textbook home besides the archaeological dig
23 project and core data project?

24 A No.

25 Q Did the other students who you know asked for

1 A She asked me -- she confronted me and asked me
2 about the deposition. How long did it take. And she
3 asked me about some of the questions that were asked.

4 MS. LHAMON: I'm going to instruct you not to
5 answer any further about conversations you had with
6 Cindy about the case.

7 BY MS. VANSE:

8 Q Was there an attorney present when you talked
9 with her?

10 A No.

11 Q Where were you at?

12 A I was at the Community Coalition.

13 Q Is she also a member of the Community
14 Coalition?

15 A Yes.

16 Q Do you know if there are other plaintiffs who
17 are members of the Community Coalition?

18 A Not that I'm aware of right now.

19 MS. LHAMON: Well, except for your brother.

20 THE WITNESS: Yes, my brother, of course.

21 BY MS. VANSE:

22 Q Do you remember how long your conversation
23 lasted?

24 A It was only about ten minutes.

25 Q For your second semester 9th grade science

- 1 class, you said that there were other students who
2 wanted to use the textbook at home and couldn't?
3 A Yes.
4 Q How many times do you know of that a student
5 wanted to take a textbook home and couldn't?
6 A Only when we were doing -- when I was working
7 with them in a group in a project and that was maybe
8 about five times.
9 Q Is this five times you worked in a group or
10 five times that they wanted to take a textbook home and
11 couldn't?
12 A Five times we worked in a group.
13 Q And how many times did they want to take a
14 textbook home and were not allowed to?
15 A Maybe about three.
16 Q When was the last time you remember someone
17 wanted to take a textbook home and couldn't?
18 A That was for our archaeological dig project.
19 Q How about the time before that?
20 A The time before that?
21 Q Right. That a student in your science class
22 that you know of wanted to take a textbook home and
23 couldn't.
24 A I really can't remember. I know there was a
25 project that was before then, but that project was on

- 1 the Alexander Library, but that was a separate research
2 project that we were doing and that didn't require us
3 taking any books home or anything.
4 Q So why did they want to take one home?
5 A I don't know if they wanted to take one home or
6 not, but I know it was the previous project before the
7 archaeological dig project.
8 Q How about before that?
9 A Before then, that was the core data project.
10 They wanted to take one home to study up on species and
11 Carlos Lineas, which was the scientist that -- well, he
12 was a scientist that came up with a research project
13 dealing with hereditary genes and stuff like that. So
14 they wanted to take the textbook home to study up on
15 that.
16 Q How do you know that they wanted to take a
17 textbook home?
18 A Because we were working in a group then,
19 working on the same species or the same specimen in the
20 jar; we were working on the same project, working in the
21 same group.
22 Q Did they tell you that they wanted to take one
23 home?
24 A Yes.
25 Q Do you know what they used instead of a

- 1 textbook?
2 A No.
3 Q Do you know if they talked to your teacher
4 about why they couldn't take one home?
5 A No.
6 Another project that I worked on was the
7 project where we had to find out different hereditary
8 genes and different -- what is it called? -- different
9 handicaps and where were they located on the gene for
10 the people who received it hereditarily. And part of
11 that project was to contact someone at UCLA or USC, a
12 scientist, because our teacher was a former USC or UC --
13 I believe it was UCLA. She was a former -- what do you
14 call it? -- professor. And she worked in the research
15 lab.
16 Q And this was Ms. Harris?
17 A Yes.
18 Q Was that a project you wanted to use a textbook
19 at home and you couldn't?
20 A No. Because they didn't require using a
21 textbook. She wanted most of our information derived
22 from the Internet research project.
23 Q Where would you do the Internet research?
24 A In the library, in the school.
25 Q Any other projects that you can think of in

- 1 that science class?
2 A Not at the moment. That's it.
3 Q How about your PE class for the 9th grade year,
4 did you have a textbook in that class?
5 A No.
6 Q What would you do?
7 A PE was physical education. It's all basically
8 sports. All you do is exercise and play different
9 sports.
10 Q Did you receive a grade in PE?
11 A Yes.
12 Q How were you graded?
13 A You were graded based on -- for our final we
14 had to run the track. We had to run about four miles --
15 it was about two miles. It was eight times around the
16 track. And you had to run within a certain time period.
17 You had to run in less than 15 minutes. And then from
18 15 minutes -- actually it was 18 minutes. And then from
19 18 minutes on up, if you didn't complete those two laps
20 within 18 minutes, depending on every two minutes,
21 that's how far your grade would drop down. So, for
22 example, if you finished in 20 minutes it would probably
23 become like a B. So for every two minutes that passed
24 the grade was lowered.
25 Q Were you graded on anything else?

1 A We were graded based on our performance in
2 physical exercise, such as football, basketball. We
3 play a little bit of tennis. We play a little bit of
4 volleyball. And we had to do circuits on the track.
5 Circuits on the track. And then we also had to do
6 circuits within in the gym. Then we had to complete the
7 title training.

8 Q I'm sorry, what was that?

9 A Title training.

10 Q Anything else that you were graded on?

11 A That's it.

12 Q Did your teacher ever use any like work sheets
13 or handouts in class on sports or anything else?

14 A The only work sheet -- the only handout that we
15 had was for football. And it was -- we were only given
16 one exam. And the only reason we were given that exam
17 is because the class challenged the teacher to -- they
18 were saying that they know more than the teacher about
19 football. So she gave us a couple questions about where
20 the referee stands or how many players are in the game.
21 It was just basic questions. So after we did that that
22 was when we eventually played football.

23 Q Anything else that you used in that class that
24 was maybe written? Like a book or a work sheet or a
25 handout, anything that was on paper rather than just

1 what do you call it? I feel it is like a quiz. How to
2 cross different -- it was part of the cell theory, how
3 to cross different plants.

4 Q Anything else that you did in class?

5 A Other than that, that's it.

6 Q The textbook that you had, could you take that
7 home?

8 A No.

9 Q Do you know why not?

10 A There weren't enough books in the class for
11 students to be able to take them home. And a lot of
12 times there were maybe about one or two students that
13 would have to share a textbook with another student
14 because there weren't enough.

15 Q How do you know that you couldn't take a
16 textbook home?

17 A Our teacher told us we could not take a
18 textbook home.

19 Q When did he tell you that?

20 A It was a female, Ms. Coreley. And she told us
21 at the beginning of the semester.

22 Q It was at the beginning of the first semester?

23 A Yes.

24 Q Did she tell you why?

25 A She told us that there wasn't enough textbooks.

1 oral instruction?

2 A That's it.

3 Q For your 10th grade year you took biology,
4 right?

5 A Yes.

6 Q Did you use a textbook in that class?

7 A Yes.

8 Q Did you use anything else in class besides the
9 textbook?

10 A We used work sheets.

11 Q Anything else?

12 A That's it.

13 Q How about any experiments or projects?

14 A We did one experiment where we analyzed
15 different cell material. So we took different -- I
16 guess you had skin cells from different types of animals
17 and plants and we analyzed that. Another thing that we
18 did was -- another thing that we did -- that was it.
19 That was the only project that we did. Other than that
20 we had other projects but it dealt with watching a
21 video.

22 Q What was the video on?

23 A Sometimes the video would be about the -- well,
24 it would be about the human anatomy. Another video
25 would be about how to cross plants, how to cross the --

1 Q Did she say anything else?

2 A Other than that, that's it.

3 Q You said sometimes there weren't enough books
4 for students to use in class?

5 A Yes.

6 Q How often would that happen?

7 A Every time we had to use our textbooks, because
8 the class is overcrowded and there were -- there just
9 weren't enough books in the classroom, so a lot of
10 students ended up sharing books with another student.

11 Q How many times would you use a textbook each
12 week?

13 A We would use it almost every day.

14 Q Did you ever have to share a textbook?

15 A Yes.

16 Q How many times?

17 A Only three times.

18 Q Is that three times both semesters?

19 A Yes.

20 MS. LHAMON: Just so I'm clear. Is that three
21 times total or three times each --

22 THE WITNESS: Three times total.

23 BY MS. VANSE:

24 Q Did you ever talk to anyone about having to
25 share a textbook in your class?

- 1 A No.
- 2 Q Do you know if students in other biology
3 classes had to share textbooks also?
- 4 A No.
- 5 Q What was the condition of the textbook in
6 biology like?
- 7 A Very poor condition.
- 8 Q Why do you say that?
- 9 A They were written in and they were old. And so
10 a lot of times when the teacher would give us an
11 assignment in the textbook, we will watch a video, and
12 then we will realize that the textbook says something
13 different. So I will point out to her -- maybe about
14 one or two times where I pointed out to her that the
15 information located in the textbook was wrong.
- 16 Q How many times did you do that?
- 17 A Maybe one or two times.
- 18 Q Do you remember the first time that you told
19 her that?
- 20 A I do remember the first time was during the
21 first semester, but I really can't remember what it was
22 about. It was a minor detail, but a detail that can
23 change the whole theory of our projects.
- 24 Q Did she say anything to you about that?
- 25 A Yes.

- 1 Q What did she say?
- 2 A She informed the class that the information was
3 wrong and so she told them -- I think it was a section
4 review question. And she told them that just to
5 disregard it and she gave us the correct information for
6 that section. And she just told us to use the
7 information that she gave us as the right information.
- 8 Q How about the second time, do you remember what
9 that was about?
- 10 A I really can't remember.
- 11 Q Do you know if that was the first semester or
12 the second?
- 13 A That was the first semester.
- 14 Q Do you remember what your teacher said when you
15 told her that the information in the book was wrong?
- 16 A She again informed the class that the
17 information was wrong. And she again told them to use
18 the information that she had given us as the correct
19 information.
- 20 Q Anything else about the condition of the
21 textbooks that you didn't like?
- 22 A Outside some of the books -- some of the books
23 on the outside, some of them had like -- some of them
24 had cut marks as if it were ripped. A lot of times the
25 entire book would just fall out of the cover, parts of

- 1 the book would fall out of the cover. Pages would come
2 out of the binding.
- 3 And then a lot of times the parts, especially
4 the index and the glossary in the back, everything that
5 is located in the back, sometimes those pages will be
6 torn out. And those would be the pages that we really
7 need. Even though we had a book that didn't mean that
8 we didn't have to end up sharing a book with another
9 student, because the pages that were torn out forced you
10 to use another textbook and share a textbook with
11 another student.
- 12 Q Was there one certain book that you would use
13 every time you were in class?
- 14 A No. Everyone got a book based on a
15 first-come-first-serve basis.
- 16 Q How many times did you use a book that had cut
17 marks on the outside cover of the book?
- 18 A Almost every time.
- 19 Q How many books did you use where the cover
20 would just come off?
- 21 A It was probably about 90 percent of the time,
22 because after we get done with the books we will stack
23 the books on our desk, and our teacher, she will just
24 put the books aside on the counters, and a lot of times
25 we end up getting the same books we had before;

- 1 sometimes people would just switch them around. I know
2 every time that when I used the books it did have pages
3 that were torn out of the glossary or the index and
4 sometimes pages would fall out from the back.
- 5 Q Did you ever talk to your teacher about the
6 condition of the books?
- 7 A Yes.
- 8 Q How many times did you talk with her?
- 9 A Maybe about five different times.
- 10 Q What would you talk about?
- 11 A I will just tell her that -- sometimes I will
12 just tell her that a page is missing out of the book and
13 she will tell me to go share with another student. And
14 then a lot of times I will ask her why a page was torn
15 out or why don't we have enough books in the class. She
16 would tell me because the class was overcrowded and she
17 will try her best to get some students out, but the
18 administrators or whoever does the class scheduling,
19 they just hadn't took any students out of the class.
- 20 Q Do you remember her saying anything else?
- 21 A Other than that I know she became very upset a
22 lot of times. And she will tell us -- tell the whole
23 entire class that she needs to get some students out.
24 And a lot of times she will ask every now and then on
25 different occasions who wants to stay in the class, who

1 wants to transfer to another class, and some students
 2 raised their hand. And she will call the main office to
 3 let them know and they will tell her that they will
 4 change the scheduling for those students because of the
 5 overcrowding, but nothing ever resulted out of it.
 6 Q How many times did she become upset in class?
 7 A Almost every week. It was at least one time a
 8 week, once a week.
 9 Q What would she do that would show you that she
 10 was upset?
 11 A She will just start talking about how the class
 12 is overcrowded and basically she will just start like
 13 complaining or telling the class about how she feels
 14 about the overcrowding in the classroom or how she feels
 15 about not having the supplies that she needs to conduct
 16 the class.
 17 Q What would she say about the overcrowding?
 18 A The overcrowding, she will tell the students,
 19 well, some people need -- she will just say in general
 20 some people need to check out.
 21 Q Did she say anything else?
 22 A No.
 23 Q What about the supplies, what did she say about
 24 that?
 25 A She will say that she ordered supplies and they

1 don't know exactly what supplies she was buying or what
 2 supplies she was referring to.
 3 Q How many times did you use work sheets in the
 4 class?
 5 A We used work sheets maybe about once a week.
 6 Q What were those like? Did they have like
 7 assignments or problems on them or just information?
 8 A Basically identify different parts of whatever
 9 we were studying. There were actually questions such as
 10 the mitosis process, the process of mitosis. Labeling
 11 different types of muscles or different types of bones,
 12 labeling diagrams. That was basically it. They were
 13 sort of like review questions basically, just all review
 14 questions.
 15 Q How many times did you watch a video in
 16 biology?
 17 A Maybe about once every two weeks.
 18 Q Did you ever have to do homework or an
 19 assignment after watching the video?
 20 A Yes.
 21 Q What kind of homework assignments were those?
 22 A Most of the time it was -- we always had to
 23 take notes during the video. So what we would do, we
 24 had to use those notes to study and then she will give
 25 us work sheets the next day or we will have a test the

1 will never come and then she will always tell us that
 2 whenever she does order supplies other teachers take
 3 them. And then there were a couple times that she will
 4 tell us that the science department, they are always --
 5 they never have enough money for her to buy supplies.
 6 Q Would she complain about the overcrowding every
 7 week?
 8 A Yes.
 9 Q How about the supplies, would she complain
 10 about that every week?
 11 A Yes.
 12 Q When she talked about the science department
 13 not having enough money, how many times was that?
 14 A Maybe only about two or three times.
 15 Q The whole -- both semesters that you were
 16 there?
 17 A Yes.
 18 Q Did your biology teacher ever have to buy any
 19 supplies for class?
 20 A We were told that she had to buy supplies, but
 21 I don't know in specific what she had to buy.
 22 Q This was something that she told you?
 23 A Yes. Eventually when she did become upset
 24 again she told us that she was tired of buying supplies
 25 and that she was not going to do it anymore. But I

1 next day and then we will use -- whatever was on the
 2 video -- well, the tests will pertain to the video or
 3 the subject that we were learning at the time.
 4 Q What other type of tests did you have to take
 5 in biology?
 6 A The final exam which consisted of a hundred
 7 questions.
 8 Q Any other tests before the final?
 9 A We had different quizzes, pop quizzes where she
 10 will just pick a day out of the week where she will just
 11 say "pop quiz." Especially if we got an abundant amount
 12 of information in one day, she will come the next day,
 13 she will tell us that we will have a pop quiz on what we
 14 learned the day before or a week before or whatever
 15 subject we were talking about.
 16 And then sometimes she will give us different
 17 quizzes on stuff that we should know or she will give us
 18 a quiz just to see where we were on a certain topic,
 19 just to see, you know, a general idea where the class
 20 was on a certain topic before she will begin another
 21 section.
 22 Q Were these quizzes that you will study for?
 23 A The pop quizzes -- I mean if you did the work
 24 and you studied at home, then you would be able to score
 25 high -- you should be able to score high on the pop

1 quizzes. But because they were pop quizzes, there
2 really wasn't any notification to study, but for the
3 final exam we did have an opportunity to study.

4 Q How would you study for biology?

5 A For biology, sometimes she will give us a work
6 sheet and then she will have us fill in the blanks. A
7 lot of times it will be like a work sheet where it will
8 be -- she will give us like a work sheet, it would be
9 two or three pages and it have like paragraphs, you have
10 to fill in the blanks within those paragraphs so when
11 you complete it it will look as if it were a whole study
12 guide that you have to read over.

13 So if you could complete the packet and fill in
14 the blanks you could use the whole -- it was sort of
15 like an essay or something like that. But after you
16 fill in the blanks you get a complete paragraph or a
17 complete chapter and then you will be able to study --
18 you can have something to study with.

19 Q How many of those -- were they like packets or
20 work sheets?

21 A They were -- I would say they were packets.

22 Q How many of the packets did you have in
23 biology?

24 A We had maybe two every week. Other times we
25 were watching the video or working out of the book.

1 class and I had to stand with other students in the back
2 of the class. And she would tell to us to take notes,
3 but eventually it became very uncomfortable for me to
4 take notes. And during class I had to stand and I
5 didn't take notes and I told her that I didn't take
6 notes and I told her that I might have to complete my
7 notes the day following, the following day.

8 Q And would you do that?

9 A Yes.

10 Q How many times did you have to stand up in
11 biology?

12 A It was probably about two or three times.

13 Q Was that during the entire time that you were
14 in the class like both semesters?

15 A Yes.

16 Q Anyone else have to stand up during class?

17 A Yes.

18 Q How many other students?

19 A Most of the time about ten other students. In
20 the beginning of the semester it was about fifteen
21 students. Eventually she did get about five of those
22 students out of the class. And then some days it will
23 vary. The most -- well, the average will be five. The
24 average will be five.

25 Q Five students per class?

1 Q Would the work that you did from the book
2 relate to what the packets were dealing with?

3 A Yes. And most of the time those packets were
4 dealing with filling in the blanks as in putting in the
5 word and then you had to have an idea of what that word
6 means. A lot of times when we would work out of books,
7 it would be most of the time definitions and, like I
8 say, identifying different parts.

9 Q Would you take notes in biology?

10 A Yes.

11 Q How often?

12 A All the time. Because every time a teacher
13 wrote something on the board, it would always pertain to
14 the subject so I would always write it down. Sometimes
15 if it was short that she was going to write or she
16 mentioned that it was something short that she was going
17 to write on the board, then I would continue my notes
18 from the previous day and/or if I had a sheet of paper
19 pertaining to the same subject, I would just write the
20 notes on there.

21 Q Was there ever a time when you couldn't take
22 notes in class?

23 A There was a few times where I came to class --
24 because the class is overcrowded there weren't enough
25 seats also. So there were a couple time when I came to

1 A I don't know per class, but it will be five
2 students in my period, during my period. It will vary
3 throughout the semester.

4 Q Would this be five students every day?

5 A Yes.

6 MS. LHAMON: You are talking about average
7 days?

8 THE WITNESS: Yes.

9 BY MS. VANSE:

10 Q The times that you had to stand up during
11 class, did you stand up the entire class period?

12 A Yes.

13 Q Did your teacher ever try and get more desks in
14 the class?

15 A She tried to get chairs from other classrooms
16 and the individual desks from other classrooms. Because
17 the way the classroom was put together was that there
18 were large round tables throughout the classroom in
19 different sections of the classroom. So if she wanted
20 to get another round table there wouldn't be enough room
21 for that table so she had to get smaller desks,
22 individual desks, to put in between the counters.

23 But that didn't help because the way the desks
24 sit, the counters would be on this side of you and this
25 side of you and they would be kind of like level -- I

1 sat in those desks before -- because it is hard for you
2 to concentrate because you are not with the class. It
3 obstructs your vision to have a counter here and then a
4 counter here and they are both elevated higher than you.

5 A lot of times a student will sit on a stool
6 and the teacher will tell them they couldn't sit on the
7 stool so they will eventually have to stand.

8 Q Why couldn't they sit on a stool?

9 A Because the teacher didn't want them to sit on
10 the stool. She didn't give any reason or anything.

11 Q Did your teacher try -- did she get the smaller
12 desks in the room and the students didn't use them or --

13 A We eventually got only two, only two in the
14 room. Students did use them, but when they did use them
15 it really didn't ease the overcrowding. Students were
16 still standing. So it didn't really make a big
17 difference.

18 Q Do you know if she ever tried to do anything
19 else?

20 A Like I told you before, she tried to get
21 students -- to take them out of the class, get their
22 schedules changed.

23 Q Anything else?

24 A That's it.

25 Q Did you ever talk to anyone about not having a

1 A Close to the end of the first semester.

2 Q What did he say?

3 A He really didn't have any opinion at all. He
4 just told me that it would probably be best if I checked
5 out of the class. That was the only advice that he
6 gave. He was a teacher, just a leadership teacher.
7 That was the only thing that he told me.

8 Q Did you talk to anyone else about not having
9 enough space in your biology class?

10 A That's it.

11 Q Did you have to stand up the second semester
12 also? Did students have to stand up?

13 A It was only one time during the second semester
14 when I had to stand up.

15 Q Did other students have to stand up during the
16 second semester?

17 A Yes.

18 Q Was that every day that they would have to
19 stand?

20 A Yes. But the students who were standing up --
21 it wouldn't be the same students. It wasn't always the
22 same students. Sometimes you will see a pattern
23 of -- sometimes it was the same students and that was
24 only because they were always the last to get to the
25 class because their classes were a lot farther than the

1 place to sit in class?

2 A I talked to my teacher. I talked to -- who is
3 that? -- Ms. Garrison. I talked to my leadership
4 teacher.

5 Q Who is Ms. Garrison?

6 A Ms. Garrison is one of the other assistant
7 principals in the school. She worked with the
8 athletic -- she was like with the athletic department.
9 She was in charge of making sure that athletic
10 activities get approved and everything. She worked
11 closely with leadership also.

12 Q What did she tell you?

13 A She told me that they were working on it. And
14 so I did go back to my biology teacher and she asked me
15 if I had talked to Ms. Garrison or anybody about the
16 overcrowding, because eventually I was thinking about
17 getting transferred -- getting taken out of the class.
18 And I told my teacher that I did talk to Ms. Garrison
19 and my teacher told me that Ms. Garrison had told her
20 the same thing, but there was never any results.

21 Q When did you talk to Ms. Garrison?

22 A It was close to the end of the first semester.

23 Q Any other time?

24 A That was it.

25 Q When did you talk to your leadership teacher?

1 other classes -- the other students' classes. So I
2 guess they kind of got adjusted to standing up. So you
3 wouldn't see the same students standing up, but it was
4 maybe about two or three that you would always see
5 standing up in the back of the class. The rest of the
6 students it would vary depending on who gets to class
7 late or who gets to class before the bell rings.

8 Q Do you know if any of the other students talked
9 to anyone else about not having enough space in the
10 biology class?

11 A No.

12 Q Were there any other biology classes that you
13 know of that had the same space problems?

14 A I don't know.

15 Q Do you know how many other biology classes
16 there were at the school?

17 A I don't know.

18 Q Do you know how many students transferred out
19 of your biology class?

20 A There was about five.

21 Q That was total over both semesters?

22 A Yes.

23 Q Do you know what classes they were transferred
24 into?

25 A No.

- 1 Q For your world history class, did you have a
2 textbook in that class?
- 3 A In?
- 4 Q World history.
- 5 A 10th grade?
- 6 Q Yes.
- 7 A Yes. Those textbooks we could not take home,
8 though.
- 9 Q Did you use anything else in class besides the
10 textbook?
- 11 A We used work sheets.
- 12 Q Anything else?
- 13 A That's it.
- 14 Q Did you have any projects in world history?
- 15 A Yes.
- 16 Q What were those?
- 17 A Creating a world history industrialization
18 newspaper.
- 19 Q Was this in class or outside of class?
- 20 A It was inside of class. The research was done
21 outside of the class and inside the class, but the total
22 project was put together inside of the class.
- 23 Q How long did that project take?
- 24 A It took about two weeks.
- 25 Q Any other projects?

- 1 A That's it.
- 2 Q How often would you use the work sheets?
- 3 A We used the work sheets probably about three
4 times a week.
- 5 Q Did those have questions on them or did they
6 have like questions for you to answer or were they other
7 information?
- 8 A Some of them had questions, some of them were
9 articles where we had to highlight the information that
10 we thought was important. The other ones were diagrams;
11 some of them were maps.
- 12 Q How often would you use a textbook in class?
- 13 A We used a textbook almost every day. Sometimes
14 the work sheets required us to look in our textbook for
15 the information.
- 16 Q And you said you could not take your textbook
17 home?
- 18 A No.
- 19 Q Do you know why?
- 20 A No.
- 21 Q Did you ever ask your teacher if you could take
22 one home?
- 23 A Yes.
- 24 Q When was that?
- 25 A She allowed me to take one home only about two

- 1 times. But she told me that she -- what she did was she
2 recorded my name and my homeroom and she just wanted to
3 make sure I did return it.
- 4 Q How about the first time you took it home, what
5 did you use it for?
- 6 A The first time I took it home was for -- let's
7 see. The first time I took it home was for the -- it
8 was for some like a globalization project where we was
9 talking about the economy, world economy. So I did take
10 it home for that one.
- 11 Q How about the second time?
- 12 A The second time I took it home for the
13 industrialization newspaper.
- 14 Q Did you ever ask your teacher if you could take
15 it home and she said no?
- 16 A Yes.
- 17 Q When was that?
- 18 A That was only about one or two times and it was
19 during the first semester.
- 20 Q Did she tell you why you couldn't take it home?
- 21 A She told me it was just a class set and other
22 students had taken them home either without her
23 permission or they took them home and never did return
24 them.
- 25 Q That is something she told you?

- 1 A Yes.
- 2 Q Why did you want to take it home the first time
3 you asked and weren't allowed to?
- 4 A The first time, that was to continue the --
5 what was I continuing that for? That was to continue
6 the first project that I told you about.
- 7 Q The globalization?
- 8 A Yes.
- 9 Q What did you do instead?
- 10 A Instead I just went ahead and did Internet
11 research.
- 12 Q How about the second time you asked and she
13 told you you couldn't take it home?
- 14 A The second time was before we started the
15 newsletter, when I was gathering information, and I
16 wanted to take it home for that purpose. And basically
17 what I was doing with that was to take information I was
18 given in the book and to do research on the Internet
19 just to kind of expand, you know, the information that I
20 was given in the book.
- 21 Q What did you do instead?
- 22 A Instead I just did the Internet -- I wrote down
23 some of the topics that were in the book and I
24 researched them on the Internet and I used the
25 encyclopedia.

1 Q Do you know if any other students were able to
2 take the textbooks home during the class?

3 A She generally told all the students that the
4 textbooks aren't allowed to be taken home and then
5 eventually some students did ask if they could take it
6 home and she told them no. And then there were other
7 times where she would tell students that if everybody
8 didn't want to take the textbook home, maybe if it was
9 about one or two people, then she will allow them to
10 take it home but they had to make sure that they would
11 bring it back the next day.

12 Q Is this something that she told the class like
13 at the beginning of the semester, that you can't take
14 the textbooks home?

15 A Yes.

16 Q When did she tell the class that if not
17 everyone wanted to take one home, some students could
18 check it out?

19 A That was for I think one of the assignments we
20 were doing; I think we were studying for the exam. And
21 the other students wanted to make up work also.

22 Q Do you know for the makeup work if students
23 were allowed to take the books home?

24 A For the makeup work, sometimes we had to make
25 sure that we turned in all of our section reviews so

1 There was only maybe about one or two books that you
2 will see writing in and that was only maybe like in the
3 back. So the books were in pretty good condition; they
4 weren't that bad.

5 Q Did you have the same book every time you would
6 come to class?

7 A No. The books would sit up under our desk. In
8 the individual desk, it would sit up under the seat.
9 And sometimes another student from another period, they
10 will go and take the book and use it at another desk and
11 they will put it under their desk, so the books end up
12 being switched around. I could have probably used the
13 same book all the time but there was really no way of
14 knowing because another student probably could have
15 switched them around.

16 Q Did you notice if any of the books seemed newer
17 than others?

18 A All of them were in -- they all looked the
19 same. They were all in the same condition.

20 Q How often would you have homework in world
21 history?

22 A In world history we had homework every now and
23 then. Whenever we were working on a project or we had
24 to complete a work sheet or study for a test that we
25 were going to have on a Friday.

1 that did require us to take the textbook home.
2 Sometimes she told students no, and other times she told
3 them yes. And at the time she said no, she told us that
4 if we want to make up the work we have to come in either
5 during lunch or sometimes she will be there after school
6 if she didn't have a meeting, or we had to make it up
7 the next day in class.

8 Q Other than the two times that you already told
9 me about, how many specific instances do you remember
10 where she told a student that he couldn't take a
11 textbook home?

12 A How many times? There was only maybe about
13 once or twice that I actually heard her say that they
14 couldn't take it home.

15 Q Other than the times you've already told me
16 about, how many times do you actually remember her
17 telling students that they could take a textbook home?

18 A That they could?

19 Q Yes.

20 A Maybe once or twice.

21 Q What was the condition of your textbook in
22 world history like?

23 A They were fairly new. They weren't that bad.
24 The year of the books was 1998. So those -- the
25 textbooks we did have, they were pretty much accurate.

1 Q Did you have tests every Friday?

2 A No.

3 Q How many times do you think per week you had
4 homework in world history?

5 A Maybe -- it wasn't a per week thing. It was
6 maybe about -- I can probably do it by the month. We
7 had current events every Tuesday and Thursday. Yeah, so
8 that does count as homework. Current events we would do
9 every Tuesday and Thursday. So we had homework twice a
10 week.

11 Q What was the current events homework?

12 A They had to be related to world history.
13 Anything that has to do with the stock market or a
14 change in cultural differences or something like that.
15 Anything that had to do with world history.

16 Q How often did you have tests?

17 A We had tests maybe about once a month.

18 Q Any other quizzes?

19 A What she would do is she would make sure that
20 all of us -- the way she did her work was that if we
21 turned in all the assignments, she will count that as a
22 final quiz grade. Because part of a tradition that
23 teachers had at Crenshaw in all your classes -- in most
24 of the classes you would have a test every Friday. So I
25 guess what she would do, she said she will add up our

1 points -- add up the points and give you whatever points
2 you had for that week that would count as your quiz
3 grade for that week.

4 Q For the tests that you had, how would you study
5 for those?

6 A I would go over my work sheets and sometimes
7 she will give us time in class to finish up some of the
8 assignments that we didn't finish before. So I would
9 use that time to either finish the assignments or study
10 for the quiz by going over my work sheets and reading
11 the book.

12 Q Anything else you did to prepare for the tests?

13 A That's it.

14 Q What would you do -- you took leadership in
15 your 10th grade?

16 A Yes.

17 Q What was that class like?

18 A The class, it was very demanding. The whole
19 purpose -- well, I was chairperson over the Spirit
20 Committee, which means I had to promote school spirit
21 within the school. And I gained that position because I
22 participated in another group in my 9th grade year,
23 Cougars on the Prowl. And so what they did, they were
24 going to have me as chairperson over the Spirit
25 Committee, which means that I had the responsibility of

1 "Okay, I'm going to give you a grade." He would ask --
2 what he will do is he will give the grade sheet to our
3 student body president. The student body president
4 would kind of like give a grade and list down like some
5 of the stuff that you did in the leadership class to see
6 if you actually did anything in the class.

7 And then the student body president will pass
8 it down to the student body vice president. The student
9 body vice president will write down what he notices
10 about the person. So it will go down, it will go from
11 the student body president to the vice president and
12 then they will pass it down to some of the committee
13 members that participate in your committee and then they
14 will ask the secretary. So it ends at the secretary.

15 And the secretary and the parliamentarian get
16 together and they ask -- they go down this list and ask
17 how many out of orders you had in a parli -- because we
18 do follow the parliamentary procedures. So they kind of
19 go down a list and see how you participated in the
20 parliamentary procedures, what roles you played in the
21 parliamentary procedures.

22 They also grade you based upon our -- they call
23 them House of Representative meetings, which means every
24 person from a committee and then the student body
25 members will all go down to the library and invite a

1 creating a lot of events such as the pep rallies or
2 events that had some kind of theme to it.

3 And I tried to -- basically the committee ran
4 on my time. I tried to plan an event at least every
5 month. And then I made sure that the people in my
6 committee, just in case they weren't doing anything, I
7 made sure that they participated in the fund-raisers or
8 they helped other committees do whatever work there was
9 that needs to be done within their committee.

10 Q How were you graded in the leadership class?

11 A Based on how active I was in the leadership
12 class. In the beginning of the class -- well, before
13 you entered the class there is an interview and in the
14 interview you list some of your qualities. And the
15 leadership teacher kind of sees if you lived up to those
16 qualities that you mentioned that you -- some of the
17 promises that you made before you entered into the
18 class. And they wanted to see if you participate in any
19 event, if you helped out with organizing any of the
20 events. Things like that.

21 Q Anything else that you were graded on in that
22 class?

23 A The attendance. And then sometimes he
24 wouldn't -- the thing with the leadership teacher is
25 that he wouldn't just grade -- he just wouldn't say

1 representative from every classroom in fourth period,
2 and we would basically tell those students what our
3 committee is doing, what we plan on doing, and give them
4 a brief description of what our committee is about and
5 then we give them a debrief on our past event. And so
6 based on how we perform in that area he also will give
7 us a grade on that also. So it is kind of like a class
8 participation thing.

9 And what he will do is when he does get our
10 final grade, instead of just turning them in, he -- we
11 also grade the class. And the class will give some
12 constructive criticism as to, you know, how the student
13 can improve that grade, or if they think the student
14 deserves the grade then they will tell the teacher,
15 yeah, I think the student deserves the grade. So this
16 is like an open discussion thing. So we always spend a
17 day every five weeks doing that. So everyone in the
18 classroom was active in the grading process since it was
19 a student body leadership thing.

20 Q Did you think it was hard to grade other
21 students?

22 A Not really. Because everybody was open to, you
23 know -- everybody was pretty much -- one of the
24 requirements or one of the characteristics you have in
25 order to get in leadership, you have to be able to take

1 constructive criticism and you have to be able to take
2 orders from other peers without getting angry or get an
3 attitude or anything.

4 Pretty much the students felt kind of easy with
5 it because they know that if they improve the next time
6 most likely their grade will be raised, because the
7 other students will see that they improved, and there
8 was really nothing that the students would say or -- the
9 students wouldn't really feel bad about the grade they
10 received because they know whether they did what they
11 were supposed to be doing or not.

12 Q You were in that class both semesters at
13 Crenshaw, weren't you?

14 A Yes. In my 10th grade year.

15 Q You mentioned that it is a tradition at
16 Crenshaw to have tests every Friday?

17 A Yes. Not a tradition but more so you notice
18 that in every class every teacher -- almost every
19 teacher has a test for their students every Friday.

20 Q Do you know if that is something that has been
21 going on for a while at the school?

22 A Yes. Because in all my classes in my 9th grade
23 year and my 10th grade year, at least four of my classes
24 do it. And all the tests are different. It isn't like
25 a test where every -- in every class you have 20

1 students.

2 A Only about a week or two. Because usually the
3 counselors take time -- like the first two weeks of the
4 first semester or the second semester, they give you
5 time where the counselors change everybody's schedules
6 or they take request forms, and a lot of students end up
7 putting in request forms to change the class, so that is
8 how students end up checking out. So they got those
9 students out pretty quick compared to other times when
10 no one has checked out at all.

11 Q The only other time you know of is in your
12 biology class?

13 A Yes.

14 Q So for those first weeks did students stand up?

15 A Yes.

16 Q Was that for the whole --

17 A It was maybe about five students. And then she
18 had desks sitting around -- some of them sat at her desk
19 where she now has her computer. Some of them sat -- it
20 was like maybe five chairs sitting around the classroom
21 where they can sit and then they didn't have to stand
22 like the whole period. But the only problem with that
23 was they didn't have a desk so they couldn't write or
24 anything.

25 Q Did some of these students have desks and some

1 questions to do the test. Sometimes it's like a reading
2 assignment, you have to complete the reading assignment
3 in a certain amount of time. Because like you could
4 read a book the day before and they could give you a
5 reading assignment based on the book. And other times
6 where they will just give you 20 questions and you
7 answer 20 questions. Sometimes it was like a pop
8 quiz -- not a pop quiz. They give you like five
9 questions and if you answer those questions and you do
10 them on time, that will be the quiz, or sometimes it is
11 a short paragraph essay for a quiz. It just varies for
12 whatever class.

13 Q Other than the biology class, were there any
14 other classes you had at Crenshaw that didn't have
15 enough desks for students?

16 A Biology for the second semester. At first the
17 Spanish class didn't.

18 Q This was Spanish in your freshman year?

19 A For my sophomore year. Students checked out of
20 that class within like the second week. Let's see.

21 Another class? That was it. That was the only class.

22 Q So for your Spanish class, how long did that
23 last?

24 A Overcrowding?

25 Q Right. That they didn't have enough desks for

1 just have the chairs?

2 A Like I say, it was only five students who were,
3 you know, standing up the first couple -- the first
4 time. And then they eventually had found -- they
5 eventually found seats to sit. So there were chairs but
6 there were no desks.

7 Q At first did they have -- let me see about
8 this.

9 The five students, did they all have to stand
10 up before there were desks?

11 A Yes.

12 Q Did they stand up for the whole period?

13 A No.

14 Q About how long do you think they stood up?

15 A Probably half the period because by then the
16 chairs were brought in.

17 Q How many days did that go on?

18 A Maybe only about two days. And then they
19 got -- the teacher just told them to sit at the extra
20 chairs that were sitting around until people were
21 checked out.

22 And I also want to add that for those first two
23 weeks we have did have a sub, but it was the same sub,
24 which was my health teacher.

25 Q Did the students have regular desks in the

- 1 Spanish class?
 2 A In the Spanish class, eventually -- like I
 3 said, people checked out. So some people who did have
 4 desks the first time around, they checked out, and some
 5 people who had to stand up, checked out. So eventually
 6 it evened out to where all the students had desks.
 7 Q That was within the one to two weeks?
 8 A Yes.
 9 Q Did you ever hear about any other classes where
 10 there weren't enough desks for students at Crenshaw?
 11 A No. None that I can remember.
 12 Q Any other classes where students had to sit
 13 somewhere other than a desk, just in a chair or
 14 something like that?
 15 A Other than my biology class and my Spanish
 16 class. And this is all my sophomore year, right?
 17 Q Right?
 18 A Not that I can remember.
 19 Q How about your freshman year?
 20 A My freshman year, let's see. My Spanish class
 21 in my freshman year was overcrowded like the first two
 22 weeks. Those people checked out. Let's see.
 23 Q Do you want me to go through your classes that
 24 I've written down?
 25 A Yes.

- 1 Q How about your algebra or your math
 2 investigations class your freshman year?
 3 A No, that was not overcrowded.
 4 Q Your education and career planning class?
 5 A That class was for the first two weeks.
 6 Q We've already talked about your Spanish. Was
 7 that Spanish both semesters?
 8 A For --
 9 Q That there were more students than there were
 10 desks?
 11 A The Spanish class that I mentioned to you with
 12 the more students, that was for my sophomore year.
 13 Q Right. I thought you said that during your
 14 freshman year also for the first two weeks there were --
 15 A For my freshman year that class was the same,
 16 but the students checked out in a much quicker pace.
 17 That only took about two or three days, maybe about a
 18 week.
 19 Q But was that your first semester or second
 20 semester Spanish?
 21 A For first semester Spanish, because I had the
 22 same teacher all the way for the whole year.
 23 Q How about your science class?
 24 A Science class for --
 25 Q For your freshman year.

- 1 A That class was not overcrowded.
 2 Q Your health class?
 3 A That class was overcrowded for maybe about two
 4 or three days.
 5 Q Physical education?
 6 A Physical education was never overcrowded. We
 7 were all in the gym so --
 8 Q For your Spanish class in your 9th grade year,
 9 did students have to stand up in class?
 10 A Yeah; maybe only five students.
 11 Q Did they have to stand up for the entire class
 12 period?
 13 A Yes.
 14 Q Do you know if your teacher tried to get any
 15 extra desks in the class?
 16 A He told them that they just need to check out.
 17 I don't know if he tried to get extra desks or what.
 18 But he did -- what the teachers do is they do let the
 19 main office know that their class is overcrowded and
 20 they need to have students taken out. I don't know if
 21 the students put in a request themselves or the
 22 counselors did it based on the teachers' requests.
 23 Q Did you have to stand up during that class?
 24 A No.
 25 Q How about your education and career planning

- 1 class, were there students having to stand up in that
 2 class?
 3 A Students were on the desk -- there was some
 4 desks were aligned against the wall, but those didn't
 5 have chairs so some students sat on the desk. And then
 6 there was maybe about one or two chairs sitting by the
 7 door so there were one or two students that sat there.
 8 Q How long did that last?
 9 A That lasted maybe about two weeks.
 10 Q Did you ever get any additional desks or chairs
 11 for those two weeks?
 12 A We did. And they just added -- what they did
 13 was they got the chairs for the desks that the students
 14 were sitting on. So the students were eventually able
 15 to sit there. And then they replaced the two chairs
 16 that were sitting by the door so they replaced those
 17 with individual desks. So now students were able to sit
 18 there. And then they placed more chairs towards the
 19 rear of the classroom.
 20 Q Do you know how quickly that happened during
 21 the class?
 22 A It happened fairly quickly because it was
 23 during the time the substitute was there. Maybe about a
 24 week. It happened in about a week.
 25 Q And then you said eventually some students did

- 1 get transferred out of that class?
 2 A Yes.
 3 Q How about your health class, did students have
 4 to stand up in that class?
 5 A In my health class, no.
 6 Q So why did you think that class was
 7 overcrowded?
 8 A Because the way it was set up, it was like
 9 everybody was all kind of squeezed in together at first
 10 and then students did check out. And what they did was
 11 they took -- I think what happened was one of the
 12 bungalows that was next door was not being used at the
 13 time so what they did was they took desks out of there
 14 and put them in our classroom. And then when some of
 15 the students checked out, they took those desks out and
 16 put it in the classroom next door.
 17 Q How long did it take for students to get
 18 checked out of that class?
 19 A Maybe about only a week.
 20 Q When you used the word "overcrowded" for a
 21 classroom, what do you mean?
 22 A I mean -- what I mean by overcrowded is that
 23 there is like a lot of students in the room where
 24 students either don't have enough seats or everybody is
 25 put into where they are squeezed in. Overcrowded -- the

- 1 number that I measure overcrowded is over 30 students.
 2 Q How did you come up with that number?
 3 A Because a lot of times a classroom can only fit
 4 about 25 desks and then some students end up going to
 5 sitting in seats where they have to face away from the
 6 chalkboard. And so if they are sitting away from the
 7 chalkboard I figure those seats really shouldn't be in a
 8 classroom and then those students should be taken out
 9 and put into a different classroom.
 10 And then a lot of times with that number there
 11 is no individual time where a teacher can come and help
 12 you because if everybody needed help, or if the majority
 13 of students needed help, the teacher would have to go to
 14 each and every one of those students and you have to
 15 wait a very long time to get help from the teacher. And
 16 sometimes it gets too long because eventually the bell
 17 will ring or there is just not enough time.
 18 Q How many times does that happen to you where a
 19 teacher couldn't give you instruction in class?
 20 A That happened a lot when I was in my sophomore
 21 year, my 10th grade year. In Spanish it happened a lot.
 22 Q Like how many times?
 23 A Maybe about three times a week. Because a lot
 24 of times a teacher will try to go down each and every
 25 row and then by the time she gets to my row the bell has

- 1 rung or we are ready to move on to the next subject.
 2 Q Any other class besides your sophomore year
 3 Spanish?
 4 A My biology class.
 5 Q Your teacher wasn't able to give you individual
 6 instruction?
 7 A No.
 8 Q Any other class?
 9 A My world history class.
 10 Q Anything in your freshman year?
 11 A My freshman year, my ECP class for sure.
 12 Sometimes -- well, I didn't really have any questions in
 13 health class, but when I did have questions it only
 14 happened like very rarely when I couldn't get help from
 15 my teacher.
 16 Q In health?
 17 A Yes.
 18 Q Your 10th grade Spanish class, you said three
 19 times a week you didn't receive the individual
 20 instruction?
 21 A Yes.
 22 Q Describe to me how a Spanish class -- did you
 23 have a teacher kind of giving a lesson at the beginning
 24 of the class?
 25 A What we will do is we will do these things

- 1 called warmups where there were math problems. And what
 2 you have to do is when you write the answer you have to
 3 write everything in Spanish, you have to write the
 4 entire math problem in Spanish and you have to write the
 5 answer in Spanish, and we will do that. And we did that
 6 for the second semester as our warmup.
 7 For our first semester as our warmup we read a
 8 magazine, a newspaper, or comic book, and what we had to
 9 do was explain what the comic book or newspaper or
 10 magazine was about in Spanish. So that happened for
 11 about like the first 15 minutes of class. Afterwards
 12 the teacher would begin her lesson.
 13 What she did, she will give you points for
 14 doing that assignment, she will give you points for
 15 doing that warmup. And then she will begin the lesson.
 16 When she begins the lesson she will ask us if there is
 17 any questions and she will come help us. When she does
 18 that she goes around the class, asks everybody what is
 19 their question; but the thing is, after she gives us an
 20 assignment she says you have this much time. By the
 21 time she gets to some people, the time has lapsed.
 22 There is no more time for her to answer any question
 23 because you have to move on to the next assignment.
 24 So when you asked her -- when you tell her that
 25 she still needs help, she will tell you "I will answer

1 your question after I finish explaining the next part."
 2 And then when she explains the next part, she will come
 3 back to you, and by that time you are left behind,
 4 because in order to understand the next part, you have
 5 to understand the first part.

6 Q Would she ever take questions from a student
 7 and answer them for the whole class?

8 A Sometimes she did that. But then when we are
 9 working on the assignment if we have a question on a
 10 particular problem or a particular sentence or something
 11 in Spanish, then that is when we need her individual
 12 help because by the time we get to that question or that
 13 problem she had already answered everybody's question.

14 So when she asks if anybody has questions,
 15 usually it's questions like -- not what do we do, but it
 16 is like general questions as to how to do it or
 17 something like that. But then the questions that
 18 followed after she finished explaining the assignment,
 19 those questions are like, "Well, I don't understand this
 20 sentence" or "I don't understand what this says" or
 21 something like that.

22 Q You said it was about three times a week that
 23 you would have a question that she couldn't get to?

24 A Yes. Sometimes she will go down each and every
 25 row and other times she will answer the questions based

1 class, it was like four students sitting to a table. So
 2 it was to where you could ask your group members or your
 3 table members about a question, or if you have
 4 anything -- any question about the assignment, it was
 5 possible that you could ask them the question instead of
 6 just going ahead and asking the teacher. So it was a
 7 different environment, a different type of classroom
 8 setup.

9 Q So why wasn't your biology teacher able to help
 10 you out? You said it was one time a week?

11 A Well, not one time a week. It was maybe
 12 about -- I really can't count. It was different times.
 13 Because, like I said, a lot of times if I had a question
 14 I will just ask someone next to me.

15 Q Do you remember any specific times when you
 16 wanted instruction from your teacher and you couldn't
 17 get it in biology?

18 A No.

19 Q Do you remember if you would talk with her
 20 after class or after school if you had a question?

21 A I would talk to her sometimes during nutrition
 22 because nutrition follows right after that class.

23 Q How many times do you think you did that?

24 A About five times.

25 Q Both semesters?

1 on the first person who raised their hands. So if a lot
 2 of students raised their hands before you did, then
 3 there's no way she can answer your question because she
 4 has to get to everyone else first.

5 Q Did you ever talk to her after class about
 6 questions you had?

7 A Yes.

8 Q How many times did you do that?

9 A About three times a week. Because usually if I
 10 had a question and she wasn't able to answer it then, I
 11 will ask her after school because I had her sixth period
 12 so I can ask her the question then.

13 Q How about your biology class, how many times do
 14 you remember you didn't get individual instruction from
 15 the teacher?

16 A A lot of times. Maybe about one time a week.
 17 Because a lot of times she will tell us "Well, if you
 18 don't understand, then you can ask the person next to
 19 you." That is what I eventually did, I asked the person
 20 next to me. So if they understand how to do it, they
 21 will help me with the assignment.

22 Q Was this similar to the Spanish class where
 23 there were too many questions?

24 A It worked kind of different because the thing
 25 with the way the classroom setup was in my biology

1 A Yes. And she was able to answer those
 2 questions.

3 Q How about your world history class, how many
 4 times did you want individual instruction and you
 5 couldn't get it?

6 A My world history class, that was probably about
 7 two times a week.

8 Q How would that come about?

9 A It was sort of like the Spanish class, but it
 10 worked a little bit differently because what she would
 11 do is she will -- if she was like right there next to
 12 you, then she will answer your question. But sometimes
 13 she will be all on the other side of the room. And the
 14 way the tables are, the tables -- there is a row of
 15 desks that face towards the door and then the people who
 16 are close -- it's hard to explain. Like the door is
 17 here (indicating). The desks that are on this side of
 18 the room, they all face towards the door. The desks
 19 that are on this side of the room, they all face towards
 20 the back of the room. So if she was answering questions
 21 on the far side of the room, then she will be faced away
 22 from you so she really can't see if your hand is up or
 23 anything.

24 MS. LHAMON: D'Andre, when you are answering
 25 questions if you indicate, if you say something is on

1 this side of the room or that side of the room, we won't
2 be able to figure out what it is in the record. If you
3 can think about it, think about saying it is on the left
4 side or the north side or some other indicator that
5 would help.

6 THE WITNESS: Do you want me to explain it that
7 way?

8 MS. VANSE: Yes. Or if it would be helpful you
9 can draw it out too. Or you can just explain as she
10 said. I think you were doing it with the front of the
11 class and the back of the class. That works well.

12 MS. LHAMON: That was really helpful.

13 BY MS. VANSE:

14 Q So the two times a week that was -- she
15 couldn't see your question or your hand up?

16 A She will probably be like on the other side of
17 the room, on the west side of the room. Because the
18 desks on the west side of the room face towards the door
19 and the desks on the east side of the room face towards
20 the back of the classroom towards the window. So she
21 will be on the west side of the room and I sit on the
22 east side of the room, so if I ask -- if I raise my hand
23 to ask her a question, her back will be faced towards me
24 so she wouldn't be able to see my hand.

25 Q Then would you ask her the questions after

1 A The only reason I wasn't able to get individual
2 instruction at the time is because the teacher wasn't
3 there. I mean, the substitutes weren't able to answer.
4 All they knew was to look at the book and give you the
5 assignment and that's it. They wouldn't know how to
6 answer the question if I asked them a question.

7 Q How many questions do you think you had that
8 weren't answered?

9 A I probably had a question like every day.
10 Because all the substitute knew how to do was give you
11 the assignment. The only thing you could do is follow
12 the instructions that the book give you, and that's it.

13 Or you could refer to a page or something like that.

14 But other than that, the substitute wasn't able to
15 answer the questions because the sub knew as much as we
16 knew, which is basically nothing.

17 Q When Mr. Patrick was there did he answer some
18 of your questions in class?

19 A When Mr. Patrick was there, yes.

20 Q When Mr. Patrick was there, was there ever a
21 time that he wasn't able to answer your questions
22 because there were other students who had them?

23 A Maybe about only once or twice.

24 Q How about in your health class, you said there
25 was one or two times you had -- you couldn't get

1 class or after school?

2 A I couldn't because the way -- the location
3 where the bungalows were, they were all the way on the
4 south side of the room -- I mean on the south side of
5 the campus. So I had to almost travel across the
6 country to go to my class on the other side -- on the
7 north side of the school -- the north side of the
8 campus.

9 So it took me -- it's a break period between
10 the passing -- the pass period -- the time for the
11 passing period to go to the next class is six minutes.
12 It would take me at least five minutes to get to my next
13 class and that's if I wasn't running. No, that is if I
14 was running. Because I ran almost every day to that
15 class.

16 Q So would you ever get your questions answered?

17 A Sometimes I did, sometimes I didn't, because I
18 will ask her the next day.

19 Q Would you ever ask any of the other students in
20 the class about a question?

21 A Sometimes I would, if they were able to answer
22 it, so it helped a lot too.

23 Q How about your ECP class, can you remember a
24 time when you didn't get individual instruction in that
25 class and you wanted it?

1 individual instruction?

2 A Yes. Maybe one or two times.

3 Q Do you know why you couldn't get it then?

4 A Either because the bell rung or there was other
5 students asking questions or if he was on the other side
6 of the room talking to other students.

7 Q Would you ask him your question after class or
8 after school?

9 A No. Because I had to go to another class.
10 Third period I was again in the bungalows. And for my
11 fourth period class I had to go all the way down to the
12 science building, which is all the way again on the
13 north side of the campus. So when they put the new
14 bungalows in place, I guess they didn't take into
15 consideration the scheduling for the students, because
16 every year when I had a class in the bungalows, there
17 was never a time where my class was right there next to
18 the bungalows because the bungalows is located in the
19 south parking lot of the campus. Well, it was a former
20 parking lot.

21 Q For your ECP class, did you ever ask
22 Mr. Patrick questions that you had that the substitutes
23 couldn't answer?

24 A No, not really. Because when Mr. Patrick came
25 in he told us he doesn't care what the subs did, we are

1 going to start our grading all over again. He told us
2 everybody starts off with an A. We began our projects
3 and we started the class as if it were new when
4 Mr. Patrick came in. So whatever questions I had for
5 the substitutes about the assignments that we did before
6 Mr. Patrick arrived at the school, those were just
7 thrown out of the window because he said we were
8 starting over.

9 Q How about the second time he came back?

10 A The second time he came back?

11 Q Mr. Patrick left --

12 A Mr. Patrick never came for the first about five
13 weeks of school and then he came after those five weeks
14 and then for maybe about the last -- the last two to
15 five weeks he never did come back.

16 Q Other than the problem with the desks that you
17 had in some of the classes, were there any other
18 problems that you had, like the physical aspects of your
19 classroom, like the floor or the ceiling?

20 A The ceiling especially.

21 Q What was wrong? Well, first of all, what
22 problems did you have -- or what classes did you have
23 problems with the ceiling in?

24 A The ceiling in my ECP class. The cabinets in
25 the ECP class was nasty. Let's see. In other class --

1 cabinets and it was just like -- man, it was nasty.
2 There was dust and stuff flying out. There was some
3 books sitting on top of the cabinets and she had to take
4 all of them down. There was like mold all over those
5 books. There was some dictionaries also. She took
6 those dictionaries and put them over on the other side
7 of the classroom, because those were the only good ones
8 that we could use. The rest of the dictionaries I guess
9 they were thrown out.

10 We thought something happened to her one day,
11 because when she went to go look on top of the cabinet,
12 she was grabbing for the books and she rubbed her hand
13 across the top of the cabinets and the dust buildup was
14 so bad that it had like grease -- it was like grease and
15 it was like all over her hands and it was just nasty.
16 And a lot of students ended up like -- a lot of students
17 started helping her getting the books down and their
18 hands ended up with grease and dust. It was real nasty.

19 Q Where was this classroom?

20 A It was located in the main building. The way
21 Crenshaw -- Crenshaw's main building is made is three
22 floors. It's the A wing -- its shaped like a C. It is
23 made like that because of the name of the school. And
24 there is an A wing, a B wing, and a C wing. It was the
25 center wing, which is the A wing, which is all the main

1 my algebra class, which was for my freshman year. This
2 is all for my freshman year. That's it. That's all I
3 can think of right now.

4 Q How about your sophomore year?

5 A My sophomore year, my biology class.

6 Q That is problems other than the ones we already
7 talked about?

8 A Yes. That's it.

9 Q What was wrong with the ceiling in your ECP
10 class?

11 A They were missing tiles. And I don't know if
12 they were working on the pipes or working on the inside
13 of the ceiling, I don't know what they was working on,
14 but a lot of times we will go into the classroom, there
15 will be like white chalk or something on the floor and
16 on the -- on the desks. And then so when Mr. Patrick
17 eventually came in -- this was during the time that
18 Mr. Patrick was there, and so what he recommended is
19 that we start cleaning the desk every Friday and stuff
20 like that. And after he left it was still the same
21 problem. The ceiling was never replaced. There was
22 still tiles -- different tiles missing out of the
23 ceiling. And then in -- on his cabinets.

24 Eventually we did get the chance -- when we did
25 get our books when the sub was there, she opened the.

1 offices and everything is located and it is on the
2 second floor.

3 Q Were the tiles in the room large tiles or were
4 they smaller? Do you know the dimensions that they
5 were?

6 A They were the square tiles like this
7 (indicating).

8 MS. VANSE: For the record the deponent is
9 pointing to our ceiling which is about, I don't know,
10 12-by-12 inch.

11 THE WITNESS: Yes.

12 MS. LHAMON: It sounds good to me.

13 THE WITNESS: Yes. Those were one-foot tiles.
14 There would be different areas of the ceiling and
15 usually the parts that were -- the parts where the tiles
16 were missing, there would either be a long silver tube
17 there like some kind of vent or something, some kind of
18 insulation, or there would be a box there. I don't know
19 if they were working on it or what but that is where the
20 tiles were missing.

21 It was maybe about I would say about -- for the
22 size of the classroom, I would say about ten tiles were
23 missing, because they were like all in different areas
24 so it is kind of hard to count.

25 BY MS. VANSE:

1 Q Do you know about how many tiles there were in
2 total?

3 A No.

4 Q Was it that way for the entire semester?

5 A Yes. There were only about five or ten tiles
6 missing.

7 Q Did the chalk that was on the desks or the
8 floor, did that happen all semester?

9 MS. LHAMON: I think you are mischaracterizing
10 the testimony. I think he said it was like chalk. I'm
11 not sure he said it was chalk.

12 THE WITNESS: It wasn't chalk. It was like a
13 chalk-like substance. It looks like chalk. That is the
14 way I described it. It was like a powder. And what
15 happened, when we would go back the next day or the
16 following -- well, when we would go back every day -- it
17 wouldn't happen every day where the chalk -- something
18 like the chalk would fall on the desk; it happened maybe
19 about once a week. And sometimes we will go back and we
20 will touch our desk and wipe across the desk and you can
21 see that something fell on the desk. And the desks were
22 never wiped off after whoever worked up there or
23 whatever happened.

24 BY MS. VANSE:

25 Q And that happened about once a week?

1 A Yes. And a lot of them had stuff stuck to the
2 bottom of them.

3 Q How many desks had writing on it?

4 A Almost all of them.

5 Q Would the writing be all over the desk?

6 A Yes.

7 Q What was the writing?

8 A It was graffiti, gang graffiti. Sometimes it
9 was just scratches, deep scratches inside the desk -- on
10 the desk.

11 Q Did the desks ever get cleaned during the
12 semester?

13 A Other than when the students did it, no.

14 Q Did the students clean the desks?

15 A Yes.

16 Q With the chalk-like substance?

17 A Yes.

18 Q Anything else that was wrong with the class?

19 A No.

20 I want to take a break.

21 (Discussion off the record from
22 12:11 p.m. to 12:12 p.m.)

23 BY MS. VANSE:

24 Q What was wrong with your algebra class in your
25 freshman year?

1 A Yes.

2 Q Did it usually happen on a particular day?

3 A Usually in the middle of the week. And it
4 started happening during the time -- it happened once
5 while the substitute was there for the first time.

6 Other times it was during the time that Mr. Patrick was
7 there. And eventually it did stop, but maybe about the
8 first or second week before school ended, before that
9 semester ended.

10 Q When you were talking about the substitute who
11 was cleaning the cabinets, did that happen at the
12 beginning of the semester?

13 A Yes. she wasn't cleaning the cabinets. She
14 was just taking the books down off the top of the
15 cabinets.

16 Q Do you know if those were books that you were
17 supposed to be using in class?

18 A They were dictionaries. So it was books that
19 we could have used in class.

20 Q Anything else that was wrong with the ECP
21 classroom?

22 A Other than tiles and the cabinets, that was
23 about it. And the desks. The desks were all written
24 all over.

25 Q The students' desks?

1 A The algebra class, there was this counter. It
2 goes from door to door. The doors were on the south
3 side of the classroom and there was one on the west --
4 they were both facing south. There was one on the right
5 and there was one on the left. There is a cabinet
6 that's going in between those doors. It used to be an
7 art class, and I don't know what happened, I don't know
8 if they used it anymore or what; I don't know if they
9 just decided not to use it anymore. But we also had a
10 sink in the class, a large sink that sat right by the
11 teacher's desk. And eventually close to the end of the
12 first semester and during the beginning of the second
13 semester the whole faucet leaked. And one day you
14 walked into the classroom and the floor was just flooded
15 full of water. The whole floor was flooded.

16 Q What did you do?

17 A The teacher called in the janitor. And for a
18 while they couldn't figure out where the leak was coming
19 from because every day following we went back into the
20 classroom, and because we had it first period we were
21 always the first ones to see it. And the ceiling, it
22 just -- we couldn't figure out -- they knew it was from
23 the ceiling because you could see water stains coming
24 from the ceiling, but they didn't know exactly where it
25 came from, but they knew it came from the ceiling

1 because there were watermarks, like hard water stains on
2 the ceiling.

3 For a while they tried to figure out what was
4 wrong with it. Eventually they called somebody in to
5 repair it while we were in class. They did repair it
6 while we were in class. And they eventually took off
7 all the knobs, took out the pipes and put it -- I don't
8 know what they call it, but you place the end piece on
9 the pipes so it can't be used anymore, and they did
10 that. And the sink still sat in the classroom.

11 And so it was like -- sort of like -- the
12 classroom wasn't made to be an algebra class. It was
13 made to be an art class. So we had all these like
14 counters sitting -- there were counters in the
15 classroom. So it wasn't like made to be an algebra
16 class so it felt more like you were in an art class than
17 an algebra class.

18 And there was also these large cabinets in
19 the -- there was wall cabinets that sat in the back of
20 the classroom. And these wall cabinets were
21 installed -- not installed, but they were built into the
22 wall so they couldn't be moved or anything. And some of
23 the doors didn't lock. So a lot of the students, like
24 they will sit in those seats next to those cabinets or
25 by the doors of the cabinets, sometimes the cabinets

1 MS. LHAMON: Or "door."

2 Is that okay?

3 MS. VANSE: That's fine.

4 THE WITNESS: And there was also a door here.
5 But this door leads to the classroom next door and so
6 that is where we brought in the TV or whatever.

7 MS. LHAMON: The front two doors up on the
8 south side are the doors that you would enter and exit
9 from?

10 THE WITNESS: Yes. There is also -- this is
11 the hallway here. So there's -- in the hallway there is
12 a door here. There are some stairs that go up on this
13 side of the classroom. In the hallway there is stairs
14 here and the door there.

15 BY MS. VANSE:

16 Q Can you mark that as the hallway.

17 A (Witness complies.)

18 And then along here these are all windows here.
19 I'll just draw a line here and put "Windows."

20 These are the doors. Here is where the -- it
21 is like a counter. Here is another counter. This is
22 where the teacher's desk is. And this is where the sink
23 is. And it was a large sink. It was about the same
24 length as the teacher's desk.

25 Here it was like -- there was -- it's like a

1 will swing open and hit them in the head. So they had
2 to close them and some students went even as far as to
3 tie them down and jam them into the -- back into the
4 wall or fix them back into the wall.

5 And then those cabinets have writing all over
6 them. And they have writing like some kind of -- they
7 were done in some kind of paint. It could have been
8 some kind of whiteout or something. It looks like it
9 was whiteout, but it was green, red, or blue, something
10 like that. And all the desks in the back, those had
11 writing on them.

12 And then we couldn't use our chalkboard,
13 because the chalkboard was all the way in the corner of
14 the classroom and it was located right next to the door.
15 So the only thing that we could put up there was like
16 the bell schedule. Because if the teacher attempted to
17 teach at that board, then nobody would be able to see
18 it. Because next to that -- the board was located in
19 between the door and next to the door -- it will
20 probably be better off drawing that. That will probably
21 be better for me.

22 Q Okay.

23 A These were the doors here.

24 Q Why don't you mark them like "1" or "A" or
25 something.

1 counter. And then on top of the counter -- fixed to the
2 counter is like a display case. So I guess that is
3 where like they display art or something. So it is a
4 display here. And this will be the counter again. Here
5 is where the cabinets sit.

6 I didn't put the desks in yet because I wanted
7 you to get a general idea of what the surrounding areas
8 were.

9 Here is where the janitor's closet sits. And
10 this is where the board was. So I'm just going to put
11 an arrow here and put "board."

12 Q That is the chalkboard?

13 A It wasn't a chalkboard. It was a dry erase
14 board. Are you familiar with a dry erase board?

15 Q Yes.

16 A Here at this counter there was -- it always
17 sat -- it was a movable chalkboard and that is where it
18 always sat until the teacher brought it around.

19 Q Can you mark on there where, just like put a
20 mark --

21 A I'm just going to put "movable chalkboard"
22 here.

23 MS. LHAMON: D'Andre, so I understand, earlier
24 you testified about a chalkboard. Were you talking
25 about the dry erase board or were you talking about the

1 movable chalkboard?
2 THE WITNESS: I was talking about the dry erase
3 board where we couldn't see it even if she was to write
4 on it.

5 THE REPORTER: I'm sorry. I have to go off the
6 record.

7 (Lunch recess from 12:25 p.m. to 1:45 p.m.)

8 MS. VANSE: Can you read back like the last
9 part of what we were talking about.

10 (Record read.)

11 BY MS. VANSE:

12 Q What were some of the problems you had, like
13 the physical aspects of your algebra classroom?

14 A Okay. Some of the physical aspects of the
15 classroom were that the cabinets were open -- well, the
16 students sat next to the cabinets and the cabinet doors
17 were open and sometimes they will hit the students in
18 the head and the students would jam them closed or tie
19 them down to make sure they didn't open anymore. Some
20 of them were locked so some of the students didn't have
21 to worry about it.

22 The classroom looked as if it were supposed to
23 be an art classroom so it wasn't an algebra classroom
24 setting. The board that we used was a board that we had
25 to roll into the front of the classroom because the

1 Q On the west side of the diagram?

2 A Yes. And the students sat in front of the
3 cabinet here in this area and then so the cabinet doors
4 will swing open here. This is the door where it is
5 connected to another classroom. This is another counter
6 that was located --

7 Q That is on the north side that you designated
8 on your --

9 A Yes. On the north side of the classroom.
10 There is a counter that is located just below the
11 windows of the classroom. On the northeast corner is
12 the teacher's desk and behind the teacher's desk is
13 where the sink sits which leaked, which is here on the
14 east side.

15 On the far east side of the classroom is where
16 the counter and display case was and so there was -- the
17 display case sat on top of the counter and it was
18 basically just the large shelf with glass -- with a
19 glass cover on it where you can open it. It was glass
20 doors. Just next to that on the southeast corner is
21 where the chalkboard sat and this is the dry erase
22 board. That is where the dry erase board was. Also in
23 that corner is the janitor's closet, which is here. And
24 the janitor's closet kind of covered up the dry erase
25 board a little bit. So the students that will sit in

1 board that was already fixed into the classroom was not
2 visible by all students.

3 There was a sink in the classroom. The sink
4 leaked and -- do you want me to go through that again?
5 That the sinks leaked; how much it leaks?

6 Q Briefly.

7 A A few times the floor was wet because the sinks
8 leaked. The janitors came in to see where it was
9 leaking from. There was water stains coming from the
10 ceiling so the janitors assumed it was leaking from the
11 ceiling. Eventually he took the knobs off the sink and
12 unscrewed the pipes and plugged in the -- plugged up the
13 pipe where that was connected to the sink.

14 I'm going to the diagram. This is just the
15 diagram of basically what the classroom looks like.

16 MR. FERNOW: I would like to object to the
17 diagram to the extent that it is not an actual -- an
18 accurate depiction of what that classroom looks like.

19 THE WITNESS: It is not.

20 Here is where the counter is. There is a
21 counter in between the two doors -- the two exit doors
22 that are facing the south end of the hallway. Here is
23 where the cabinet sits where the doors will swing open
24 and hit the students in the head.

25 BY MS. VANSE:

1 this area here, they couldn't see.

2 Q The center of what you've drawn?

3 A Yes.

4 MS. LHAMON: Are you indicating the center or
5 are you indicating the seats in the bottom south rows?

6 MR. FERNOW: I think the witness should
7 identify on the document where he is referring to.

8 BY MS. VANSE:

9 Q Why don't you draw a square around the desks
10 that you couldn't see or that you are talking about.

11 A The students here cannot see the board.

12 Q Those are the seats indicated by the rectangle
13 on the diagram?

14 A Yes.

15 I drew these arrows here to indicate that the
16 space in between here and here --

17 MS. LHAMON: D'Andre, I'm going to interrupt
18 you for a second. There's a lot of rectangles on the
19 diagram. There is a rectangle around the two rows of
20 seats in the north portion of the diagram. That
21 indicates the seats where the students couldn't see; is
22 that right?

23 THE WITNESS: Yes.

24 MS. LHAMON: Couldn't see what?

25 THE WITNESS: Couldn't see the dry erase board

1 next to the display case on the counter.
 2 The arrows here to the west side of the
 3 classroom in between two rows of desks and one row in
 4 the front of those desks indicate where there were desks
 5 that sat in that area, but sometimes depending on what
 6 the teacher wanted to do, she will move those desks
 7 either forward or behind. So sometimes the desks in
 8 this area here will sit alone while there was another
 9 set that sat here or sometimes she will move those desks
 10 up to sit here while this row was empty.

11 BY MS. VANSE:

12 Q So you just put in a rectangle a row of five
 13 desks and those would sometimes move?

14 A Yes.

15 Q The teacher would move them back or forward?

16 A Yes. And that's basically it.

17 Q When the teacher would use the chalkboard, the
 18 movable chalkboard, can you place that on the diagram
 19 where that would be?

20 A When she will move the chalkboard, what
 21 happened was in the first semester, the desks sat
 22 exactly like this except for in the first semester the
 23 desk located on the east side of the classroom faced
 24 west. And in the second semester she moved those -- she
 25 turned the desks around to the other side to where the

1 A Yes.

2 Q Could all the students in the class see the
 3 movable chalkboard?

4 A Yes.

5 Q For both semesters?

6 A Yes.

7 Q How many days was there water in the class
 8 because of the faucet leak?

9 MS. LHAMON: Excuse me, Jennifer. Could we
 10 mark it as an exhibit or are you still using it? Will
 11 you be asking questions so you don't want to mark it
 12 yet?

13 MS. VANSE: Let's wait until we are done with
 14 the algebra class and then we can mark it and then we
 15 can make copies.

16 MS. LHAMON: Thanks.

17 BY MS. VANSE:

18 Q How many days was there water in the classroom?

19 A The first day that that -- I really can't
 20 remember how many days it was, but I know it was -- do
 21 you want an estimate altogether?

22 Q Correct. Was it consecutive numbers of days?

23 A It would vary. The first day the water -- the
 24 water on the floor just totally -- it was just flooded,
 25 the whole -- not flooded really the classroom, but it

1 desks sat on the east side of the classroom; they sat
 2 facing east.

3 In the first semester when the desks were on
 4 the east side of the classroom, were facing west, she
 5 will move the chalkboard around the desk on the west
 6 side of the classroom through the middle of the
 7 classroom into the counter located on the south side of
 8 the classroom. So it will face the center of the class,
 9 which is here. It will face here.

10 Q Can you label that as the chalkboard.

11 A Okay.

12 Q And it was only placed there or next to the
 13 south side counter for the first semester?

14 A Yes.

15 Q Where was it during the second semester?

16 A During the second semester she will move the
 17 chalkboard around the desks on the east side of the
 18 classroom and placed it in front of the counter with the
 19 display case located on the top.

20 MR. FERNOW: Can you put arrows on those lines
 21 to indicate that it was moving.

22 THE WITNESS: (Witness complies.)

23 BY MS. VANSE:

24 Q Was the movable chalkboard the same size as the
 25 dry erase board?

1 was like water everywhere along the classroom like it
 2 had just started from the sink and just moved its way
 3 down to the back of the room. That was the first day.

4 The second day when we came in, the water
 5 leaked but it stayed near the teacher's desk and it had
 6 just barely got to the students' desks that is located
 7 near the teacher's desk.

8 The janitors again came in and cleaned it up
 9 and that is when we started trying to figure out where
 10 the water was coming from. Also I would like to add
 11 during those days it did rain.

12 The third day the sink did leak again, but it
 13 wasn't as much. It was just under the teacher's desk.
 14 It started from the sink and it was under the teacher's
 15 desk. The third day I believe it did not rain that day.
 16 And that happened for about two weeks.

17 Q So for a period of about two weeks there was
 18 water in the classroom?

19 A Yes.

20 Q Did the janitors come in every day to clean
 21 that up?

22 A Some days a janitor would not come in. A
 23 janitor would not come in. Other days they will come in
 24 and they will tell Ms. Williams that they will do it and
 25 then they wouldn't come in during our period. So I

1 figured they came in during different periods.

2 Q Why would you assume or figure that?

3 A Because the next day the water will be cleaned
4 up. [REDACTED] will tell us that the water was
5 cleaned up.

6 Q When you said that it rained for the first and
7 second days, there was water in the classroom, right?

8 A Yes.

9 Q Do you think the rain affected the water that
10 was there?

11 A I don't know. Because we were on the first
12 floor so if it did, if the rain did have anything to do
13 with it, it would have to go through the second and
14 third floor first.

15 Q So do you think the rain had anything to do
16 with the water that was in the class?

17 A I don't know.

18 Q Do you know if there was ever a time that there
19 was water in the algebra class that the janitors didn't
20 clean up?

21 A I don't know. Like I said, there were some
22 days where water was on the floor and the janitor
23 wouldn't come in, but I don't know if they eventually
24 cleaned it up after we left or after school or whatever.

25 Q Other than the first day, was there water in

1 like -- the first semester we were there it was like the
2 first couple of days of school the cabinets opened and
3 hit somebody in the head. The second -- because it only
4 happened once or twice during the whole school year.

5 The second time it happened was during the second
6 semester. And when the janitors came in to clean the
7 water and asked the teacher about the cabinets or
8 something like that, she said that an adult school or
9 somebody used the classroom after school, so she told me
10 that she figured somebody probably opened the cabinet
11 back up and that is when she gave me the keys to lock
12 the cabinets.

13 Q How many times do you think the doors swung
14 open from the cabinet and hit a student during your
15 second semester?

16 A During the second semester only about once or
17 twice. It was only about maybe one time.

18 Q Any other problems you can think of that were
19 wrong with the physical aspects of your freshman algebra
20 classroom?

21 A One of the windows didn't close. So some days
22 when it was cold you couldn't close the windows.

23 Q Do you know what was wrong with it?

24 A No.

25 Q Do you know if it was fixed?

1 the class outside the area of the teacher's desk?

2 A No.

3 Q For the cabinets that were on the west side of
4 the room on your diagram, how many of those would swing
5 open and hit the students?

6 A Maybe about three of them, three of the
7 cabinets. Some of them, they were -- you were able to
8 close them. The three that were -- that would swing
9 open, it only happened for maybe one or two days and
10 then eventually the students found some way to keep it
11 closed by sticking paper in the door or jamming it in
12 some way.

13 Q Did your teacher ever say anything about the
14 doors on the cabinets?

15 A No, not until I asked her about the cabinets
16 and then she gave me the keys to lock all the cabinets.

17 Q When was that?

18 A That happened during the beginning of the
19 second semester.

20 Q Were you in that same classroom for your first
21 semester class?

22 A Yes.

23 Q How many times during the first semester did a
24 door swing open and hit a student in class?

25 A Maybe about only once. Because it happened

1 A No.

2 Q You don't know or it wasn't fixed?

3 A I don't know.

4 Q Other than the problems with the desks that we
5 talked about earlier, was there anything wrong with the
6 other physical aspects of your biology classroom?

7 A Of the biology classroom for my sophomore year?

8 Q Right.

9 A There were like a lot of -- they had these
10 cabinets located in the -- they were next to the door on
11 the south side of the classroom and there was like
12 broken glass in there, in the cabinets. And when I say
13 "cabinets," it was like a wooden -- like shelves but it
14 had doors on it.

15 Q And there was glass broken that was part of the
16 cabinet?

17 A I don't know. The glass that was broken was on
18 the inside of the cabinet like somebody busted a bottle
19 or something there.

20 Q So it wasn't part of the cabinet, it was
21 something inside of it?

22 A No.

23 Q Anything else that was wrong with the physical
24 aspects of your biology classroom?

25 A That's it.

1 MS. VANSE: We can mark that as an exhibit now.
2 (Defendant's Exhibit 3 marked for
3 identification by the court reporter.)

4 BY MS. VANSE:

5 Q We've talked about your ECP class, your algebra
6 class, and your biology class. Any other classrooms you
7 can think of that had other problems wrong with the
8 physical aspects of it?

9 A Not at the moment right now.

10 Q Can you briefly describe the campus at
11 Crenshaw, like how the buildings are located on the
12 campus.

13 A Well, at the entrance of the campus it is like
14 right in the center of the campus. When I say "center,"
15 I mean the center of the front of the school, the center
16 of the main street where the school is located. There
17 is the main building which is shaped like a C. There's
18 the A wing that faces out to the street. And there is
19 on the north and the south side of the building is the B
20 and the C wing. And then within that C shape on the
21 inside of the school there is a quad.

22 Just after the quad there is a stage. There is
23 an outside stage. And then behind that there is the
24 cafeteria behind. Actually the eating area, the covered
25 eating area. And then also it is the student store on

1 classroom area.

2 Just on the other side of the gym is where the
3 field -- all the fields are located. There's the fields
4 where they have the tennis courts, the basketball
5 courts. And then they have the track located on the far
6 east side of the campus.

7 Q Is the track surrounding a football field?

8 A Yes. And then just south of the track is where
9 a baseball field is. And that's where they have -- they
10 call it the softball field because that's where we have
11 baseball games. That is not the field that we use for
12 our baseball games. As a matter of fact, they don't
13 even have a baseball team so they don't use it.

14 Q Are there any portable classrooms?

15 A The portable classrooms are located on the west
16 side of the basketball courts and there used to be a
17 parking lot there. They put portable classrooms there,
18 the bungalows there. And there's approximately seven
19 that are aligning the parking lot across from each
20 other, and then just behind those there is another set
21 and that set is two classrooms. There's two bungalows
22 there.

23 Q So there is nine bungalows total?

24 A Yes. And each bungalow can hold two classes.
25 They are like all one unit, but it's two classes in

1 the corner of that covered eating area. And then when
2 you walk through the covered eating area there is the
3 cafeteria. And that is where they sell like all the
4 food and everything for the students. And then on the
5 inside of that is where the teachers' cafeteria is.

6 Just behind that building, which is the
7 cafeteria, there is an access road. The access road is
8 accessible from the other side of the school. And so it
9 runs north and south.

10 Q Do you have a gym or a field house on the
11 campus?

12 A Yes. That's what I forgot to mention. Right
13 next -- on the south side of the covered eating area
14 there is a multipurpose room. They call it the NPR
15 room. And just on the south side of that there is
16 another sort of like walkway where trees align the
17 walkway. They cut them down now. There used to be
18 trees up until like a month ago.

19 There is -- right across from that walkway
20 there's -- that's where the gym is. So they have the
21 gym. And then next to the gym there's a set of
22 classrooms. And those classrooms are, I guess, for
23 special programs because there's a counselor there and
24 there's coaches who use that classroom and there's a
25 computer room in that classroom. I mean in that

1 every bungalow. And then just behind that is another
2 baseball field where the softball team practices.

3 Q How many rest room facilities are there at
4 Crenshaw?

5 A I really couldn't tell you because a lot of
6 rest room facilities that were open during the time of
7 my 9th grade year, they were closed down and turned into
8 faculty rest room facilities. There are only two rest
9 rooms that I know of that they are open. The rest of
10 the rest rooms they had in school, they were closed.

11 Q How many rest rooms do you know of that are at
12 Crenshaw?

13 A There are two in the C wing, two in the --
14 there's two in the C wing, one in the lobby area
15 downstairs. So there's three. And there's one in the
16 environmental building. That's four.

17 Do you want me to give you the one -- including
18 the ones that are in the gym?

19 Q Yes.

20 A There are two in the gym which makes five. And
21 there is --

22 MS. LHAMON: That makes six.

23 THE WITNESS: Yeah. Six. Sorry about that.

24 Let's see. And that's it. Oh, and there is
25 one in the NPR room. That is seven. Those are the ones

1 that I know of.

2 BY MS. VANSE:

3 Q Are these rest rooms that you've just told me
4 about, are those only boys rest rooms or are they boys
5 and girls rest rooms?

6 A They are both boys and girls rest rooms because
7 for every boys rest room they have a girls rest room
8 located next to it. So altogether that's 14 rest rooms
9 if you want to include the boys and girls rest rooms
10 together.

11 Q Any other rest rooms that you know of at the
12 school?

13 A That's all I know of.

14 Q Where did you have classes when you were at
15 Crenshaw?

16 A Where did I have classes?

17 Q Which buildings were you in?

18 A I was basically all over. Well, not all over.
19 I was in the environmental building for my biology
20 classes. Because the environmental building only holds
21 two classrooms. That is where the honors and the AP
22 biology classes are. Not biology, but any kind of
23 science class. I was in the bungalow area and I was in
24 the main building.

25 Q Were you in all three of the wings in the main

1 they call it the S building, and it used to be the shop
2 building.

3 Q Do you know what it is used for now?

4 A Well, based on news media coverage last week
5 they just got a new studio put in downstairs in the shop
6 area, downstairs where the shop used to be, the
7 mechanics area used to be.

8 Q What was it used for when you were there at
9 Crenshaw?

10 A They were doing construction on it. So a lot
11 of times the entrance to the S building through the rear
12 was blocked off.

13 Q Were they doing construction the entire time
14 when you were at Crenshaw?

15 A Not during my first -- not visible during my
16 first semester of my 9th grade year, but in the second
17 semester of my 9th grade year they were doing
18 construction.

19 Q Are they still doing it now, do you know?

20 A I don't know.

21 Q The bathroom in the lobby, did you ever go into
22 that bathroom?

23 A Yes.

24 Q Did you ever go into the girl's bathroom?

25 A No.

1 building?

2 A Yes. And those were at different times so --
3 in my 9th and 10th grade year.

4 Q Which bathrooms were the most frequently used?

5 A The ones that are most frequently used is the
6 rest room in the lobby and the one in the environmental
7 building. Those were the two that were always kept
8 open. The rest were locked up.

9 Q Where is the environmental building on the
10 campus?

11 A The environmental building is located near the
12 entrance of the access road on the north side of the --
13 the northeast side of the campus.

14 Q Was that part of the classrooms you described
15 that the counselors, coaches, and the computer room were
16 in?

17 A No.

18 Also located behind the environmental building
19 is the school's garden. I never finished describing the
20 rest of the buildings on the campus.

21 Q Okay.

22 A So there is the environmental building and in
23 front of the environmental building is the access road.
24 And then ahead of that just between the access road, the
25 C wing -- the B wing of the building is the S building,

1 Q Have you ever been to a girl's bathroom at
2 Crenshaw?

3 A No.

4 Q I will just restrict my questions to the men's
5 rest room, then.

6 How many stalls were in the lobby bathroom?

7 A In the lobby rest room it was three individual
8 stalls located on the wall and then there were the
9 stalls with the doors on them. There was two there. So
10 altogether I believe it was five.

11 Q Were the three that did not have doors, was
12 that -- were they missing or were they not supposed to
13 have them?

14 A They are not supposed to have them. They are
15 just regular stalls.

16 MR. FERNOW: Urinals?

17 BY MS. VANSE:

18 Q Are they the same thing as urinals?

19 A Urinals, yes.

20 Q Were any of the urinals ever broken?

21 A There was one time where one was flooded.

22 Q When was that?

23 A That was -- it was off and on throughout the
24 two years I was at Crenshaw -- I mean throughout the
25 two -- the 9th and 10th grade year that I was at

1 Crenshaw.

2 Q How many times was it flooded?

3 A I really can't remember. But it was often. I
4 just can't really count, give you an accurate estimate
5 of how many times.

6 Q Do you know if it would be once a month or once
7 a week?

8 A Probably about once a month. Like one would be
9 flooded and then that would be fixed and then maybe
10 another one will be flooded. So it would be sort of
11 like once a month. All of them flooded at different
12 times. They were all flooded at different times.

13 Q When a urinal was flooded, would it be
14 repaired?

15 A Yes. Sometimes it would maybe take about a
16 week.

17 Q Can you remember any time that a urinal was
18 flooded and it took a week to repair?

19 A Yes.

20 Q When was that?

21 A During the -- my second semester of my 9th
22 grade year.

23 Q Were the other two urinals broken at that time
24 also?

25 A They weren't all broken at the same time. It

1 Q Then what happened?

2 A Eventually about -- well, the day I saw it, it
3 said it was fixed. Because they usually post signs
4 saying when things are fixed. When it kept flushing I
5 didn't go in the next day. I didn't know if they fixed
6 it again to make it stop flushing or what resulted in
7 that.

8 Q Was there ever a time when all three of the
9 urinals were not broken but were working at the same
10 time?

11 A Yes.

12 Q How often would that be?

13 A Maybe about -- well, from the times that I went
14 in, maybe about four separate times.

15 Q So four times you went into the rest room and
16 they were all working?

17 A Yes. Because it wasn't like I went in all the
18 time because sometimes I will avoid using the rest
19 rooms. But from the times that I can give, you know,
20 the count for the time that I've been in there.

21 Q How many times -- let's just see if you can do
22 this -- per semester do you think you would go into a
23 rest room during -- actually just the lobby rest room
24 first?

25 A Just the lobby rest room? I can give you an

1 was never a time when they were broken at the same time.
2 They will be broken at different times. So maybe one
3 would be fixed and then the next one will start
4 flooding. It is just different -- it is just different
5 times when they would flood. They never flooded at the
6 same time.

7 Q Other than the one week your second semester --
8 was it your 9th grade year?

9 A Yes.

10 Q Any other time when you can remember a urinal
11 was broken for a week?

12 A There were about five other times, but I can't
13 remember exactly what time.

14 Q What makes you think it was five times?

15 A Because it was different times during the time
16 period I was at Crenshaw. But I couldn't tell you if it
17 was my first or my second semester of my 9th grade year
18 or my first semester of my 10th grade year. I wouldn't
19 be able to give you a number for every semester.

20 Q Were there any times when a urinal that was
21 broken was fixed sooner than a week?

22 A There was one time when it was fixed sooner
23 than a week and it had a sign saying that it was fixed
24 but then it kept flushing and flushing and flushing. It
25 wouldn't stop flushing.

1 estimate. It was probably only about from my first
2 semester 9th grade year I probably only went in once.

3 Q Once the whole semester?

4 A Yes.

5 Q How about your second semester of your 9th
6 grade year?

7 A The second semester it was probably about four
8 other times. Because the first time I went in for my
9 first semester I was still getting used to the school.
10 I didn't know there was a rest room over there until
11 like the end of the semester.

12 Q When you went into the lobby rest room for the
13 first time in your 9th grade semester, were any of the
14 urinals broken?

15 A No.

16 Q Were any of the other stalls broken?

17 A The stalls, one of them was flooded.

18 Q Do you know if that got fixed?

19 A No. Because -- well, from between the time I
20 had been at Crenshaw that one was like the main one that
21 is always flooded. That stall is the main one that is
22 always flooded.

23 Q You think you used the lobby rest room four
24 times during your second semester of your 9th grade
25 year?

1 A The second semester of my 9th grade year, yeah,
2 about four times.

3 Q How many times was a urinal broken or flooded
4 that second semester of your 9th grade year?

5 A I really can't remember. I can't remember
6 exactly the dates. Let's see. I really can't remember.
7 I mean it was flooded, but it was like I didn't count
8 exactly how many times. The estimate of the time that I
9 gave you for the entire time I was there, that is the
10 only times I can give you because I didn't really count
11 any times per semester those stalls or urinals were
12 flooded.

13 Q How many times do you think you used the lobby
14 rest room in your 10th grade year the first semester?

15 A In my 10th grade year I probably used it about
16 once a month because I had door duties right there by
17 the urinal and I had to watch the hallway. So I used it
18 often in my 10th grade year.

19 Q And by "often," you mean the once a month?

20 A Yes.

21 Q How about your second semester in your 10th
22 grade year, the lobby bathroom?

23 A Second semester maybe about twice.

24 Q For the bathroom in the environmental building,
25 how many times do you think you used that the first

1 has this one hallway that goes straight to the back. It
2 is only used for -- it was mainly used before for the
3 people who worked in the garden or the people who worked
4 in the office who sold the salad dressing.

5 So the people who worked in the office of --
6 okay. There's an organization there called Food From
7 the Hood. Those are the people who sold the salad
8 dressing. The people who work in the Food From the Hood
9 office are usually there most of the time. And those
10 people, along with the students that used the two
11 classrooms in the environmental building, those are the
12 only people who usually use that rest room.

13 Because the way the environmental building is
14 set, it was like separated from the rest of the campus.
15 And it was the only set of classrooms that were on the
16 other side of the access road.

17 Q Were you in that building in your sophomore
18 year?

19 A Yes -- no. No, I wasn't.

20 Q Did you use the rest rooms in that building in
21 your sophomore year?

22 A Only used it once and that was when I went to
23 visit a class there and when I was coming out I went in.

24 Q Did any of the other students talk about the
25 rest rooms in the environmental building being flooded?

1 semester of your freshman year?

2 A The first semester of my freshman year I only
3 used it about three times.

4 Q How many urinals were in the environmental
5 bathroom?

6 A In the environmental rest room, there was only
7 two urinals and one stall.

8 Q Were either of the urinals broken any of the
9 three times you went in there in your 9th grade year?

10 A One of them always stayed flooded. I don't
11 know if it eventually got fixed, but every time I went
12 in it was always flooded.

13 Q How many times did you use that rest room the
14 second semester of your freshman year?

15 A The second semester of my freshman year I
16 didn't use it at all. I didn't have -- the students
17 that mainly use that rest room are the students that are
18 in the environmental building. They usually use it
19 during the time they are in the environmental building.
20 Because the way the environmental building is set up,
21 there is only two classrooms there and those were like
22 the main science classrooms. And that is how it got its
23 name.

24 The environmental building, it is only one
25 floor. It is sort of like a house sort of thing. It

1 A Not to me personally. I don't know if they
2 talked to anyone else or anything. I don't know.

3 Q Did you use any other rest rooms at Crenshaw
4 other than lobby and the environmental building
5 bathrooms?

6 A I used one rest room located in the C wing on
7 the first floor and that was one day after school. It
8 was probably about 10:00 o'clock at night because we had
9 just came back from a field trip and that was the only
10 rest room that was open. And the principal knew that we
11 were coming back at night so he left the breezeway
12 lights on. Because the way the school is shaped,
13 because it is shaped like a C, on the corners of that,
14 on the left and the right side of that main building,
15 the first floor in the corner, both of those sides are
16 lobbies, but the main lobby is located on the -- if you
17 are facing the school, the front building on the street,
18 the main lobby is located on the left side.

19 On the right side is where the breezeway is and
20 basically all that is there is soda machines, lights,
21 and plants. And so in order to get to the rest room
22 located on the first floor of the C wing, you have to
23 walk from the front of the school through the breezeway
24 and then to the main entrance of that hallway.

25 Q Did you ever use or go into any of the other

1 rest rooms at Crenshaw?
 2 A No. That was the only ones -- the main ones
 3 that I used.
 4 Q Did you ever use the rest rooms in the gym or
 5 locker room?
 6 A In the gym, yes. I only used those twice.
 7 That was during the time I was in PE, which was in my
 8 first and second semester of my 9th grade year.
 9 Q That would be twice for both semesters
 10 combined?
 11 A Yes.
 12 Q Did you ever use it in your 10th grade year?
 13 A No. I also used the one in the NPR room. I
 14 only used that one once. That was in my first semester
 15 of my 10th grade year.
 16 Q Did the rest room in the lobby bathroom have
 17 soap dispensers?
 18 A Soap dispensers?
 19 Q Yes.
 20 A None of them had soap.
 21 Q But they had dispensers?
 22 A Yes.
 23 Q How many dispensers were there?
 24 MS. LHAMON: Is the question about the rest
 25 room in the lobby or all the rest rooms?

1 BY MS. VANSE:
 2 Q This is the lobby rest room. How many soap
 3 dispensers were there?
 4 A Only one.
 5 Q Was there soap in that dispenser?
 6 A No.
 7 Q Was there ever soap in that dispenser when you
 8 went in the bathroom?
 9 A No.
 10 Q Was there any other type of soap like a bar
 11 soap or anything?
 12 A No.
 13 Q Was there a paper towel dispenser in the lobby
 14 rest room?
 15 A Sometimes.
 16 Q Was there a dispenser?
 17 A Yes.
 18 Q Were there paper towels in the dispenser?
 19 A Sometimes.
 20 THE REPORTER. I'm sorry. I have to go off the
 21 record again.
 22 (Recess from 2:35 p.m. to 2:50 p.m.)
 23 BY MS. VANSE:
 24 Q How many times did you go into the lobby rest
 25 room and there were not paper towels in the dispenser?

1 A All the time except for maybe once or twice.
 2 Q And that would be for the entire time you were
 3 at Crenshaw?
 4 A Yes.
 5 Q Were there hand dryers in the lobby bathroom?
 6 A No.
 7 Q Were there sinks in the lobby bathroom?
 8 A Yes.
 9 Q How many?
 10 A There were two.
 11 Q Were the sinks ever broken?
 12 A No.
 13 Q Was there toilet paper in the lobby bathroom?
 14 A No. Well, I don't know because I never
 15 bothered to look.
 16 Q You never looked?
 17 A No.
 18 Q Were there any problems other than what we've
 19 talked about with the lobby bathroom?
 20 A The lobby rest room? There was writing all
 21 over the wall and a lot of times the floor was wet.
 22 Q How many times did you go into the lobby rest
 23 room when the floor was wet?
 24 A Every time.
 25 Q Where was the water?

1 A On the floor.
 2 Q Was it around the sink, was it around the
 3 urinals?
 4 A It was all over. And the way it looked it was
 5 like -- every time you go in there you could see like
 6 footprints on the floor from like water and dirt being
 7 mixed together. You could see how people walked around
 8 in there because it wasn't like wet as in like the whole
 9 floor was like flooded, but it was like I guess like a
 10 thin layer of water or something, because when you
 11 walked in you could see like tracks of dirt all over the
 12 floor from people walking around in the rest room. It
 13 was like a water -- like dirt mixed with water sort of
 14 like footprints on the floor.
 15 Q Did you ever see anyone clean the lobby rest
 16 room?
 17 A No.
 18 Q What kind of writing was on the wall?
 19 A Gang graffiti. Sometimes it was -- like with
 20 the paint, sometimes it was like different colors of
 21 paint on the wall -- not like different colors, but it
 22 was like the same color but like different shades as if
 23 they kept painting over the wall. The mirrors were
 24 scratched up. There were stickers everywhere.
 25 Q Where were the stickers?

- 1 A On the mirrors, on the wall.
 2 Q How many, do you know?
 3 A No.
 4 Q Was it -- I mean can you give -- two or ten?
 5 A Ten, as an estimate.
 6 Q Where was the graffiti?
 7 A Just all over the walls. It was all over the
 8 stalls, on the side walls of the stalls, the top of the
 9 sink, on the mirrors, around the mirrors. On top of the
 10 urinals, like on the towel part, like the wall on top of
 11 the mirror -- I mean the urinals. It was like all over.
 12 Q Did that ever get cleaned up?
 13 A No.
 14 Q For the rest room in the environmental
 15 building, did it have any soap dispensers?
 16 A I never checked.
 17 Q Did it have a paper towel dispenser?
 18 A Yes.
 19 Q Were there paper towels in it?
 20 A Yes.
 21 Q Was there a hand dryer in the environmental
 22 building rest room?
 23 A I never checked.
 24 Q Was there a sink in the environmental building
 25 bathroom?

- 1 A Yes.
 2 Q How many?
 3 A One.
 4 Q Was that ever broken when you went in there?
 5 A No.
 6 Q How about toilet paper, was there toilet paper
 7 in the environmental building bathroom?
 8 A I never checked.
 9 Q Any other problems with the rest room in the
 10 environmental building?
 11 A No, not really. There was a little bit of
 12 writing, but it wasn't as much as the rest room in the
 13 lobby, because the rest room in the environmental
 14 building was a much smaller rest room and usually the
 15 teachers keep it locked. Unless you ask for the key --
 16 if you are going to ask for the key or they know a lot
 17 of students are going to eventually use the rest room,
 18 they will keep it unlocked for the day, but they will
 19 lock it up after school. So the only time it would be
 20 unlocked is if a teacher was going to be there in the
 21 environmental building and they know a lot of students
 22 was going to use the rest room.
 23 Q Did you ever try to use the bathroom in the
 24 environmental building and found it was locked?
 25 A Yes.

- 1 Q When was that?
 2 A I don't know exactly when it was, but I know it
 3 was during the first semester of my 9th grade year.
 4 Q Was that the only time?
 5 A Yes.
 6 Q What did you do?
 7 A I asked the teacher for a key and he opened up
 8 the door and I went to the rest room.
 9 Q The rest room you used in the C wing, did that
 10 have a soap dispenser?
 11 A I never did check. The time that I went in,
 12 the rest room in the C wing, I saw that there was some
 13 materials in there used for making cement. There was
 14 some cement packs in there. There was shovels and like
 15 wheelbarrows in there as if they were working on
 16 something, but there were also like -- I don't know. It
 17 was some kind of like container or something sitting in
 18 the first part of the rest room. Because the way it is
 19 built, when you walk in the door there's the equipment
 20 that was sitting up against the wall and then you have
 21 to walk through another like doorway and then the rest
 22 room is like right there.
 23 And it was only -- it was only maybe about two
 24 stalls -- one stall and two urinals in there and a sink.
 25 Because I guess they were working on it. Because you

- 1 could see where they had just installed some new
 2 mirrors -- a new mirror or something in there. They
 3 were putting in like frames or something -- to put
 4 something together in there.
 5 Q Did you only use the rest room in the C wing
 6 the one time when you used it that night?
 7 A Yes.
 8 Q When you went in there, did the sinks work?
 9 A I didn't check.
 10 Q Was there toilet paper in the stall?
 11 A I don't know.
 12 Q Did you notice any other problems with the C
 13 wing rest room?
 14 A Other than the equipment that was in there,
 15 that's it.
 16 Q Do you know if the equipment was there during
 17 the school hours?
 18 A I don't know. Eventually they did close up
 19 that rest room and say it was for staff only. I don't
 20 know if the students were originally able to use it, but
 21 I know we were no longer able to use it.
 22 Q How do you know that?
 23 A Because on the rest rooms that were locked all
 24 the classrooms that were next to the rest rooms that
 25 were locked, sometimes a teacher would have a sign on

1 the door saying "I am not the rest room monitor. Do not
2 ask me to open the rest room or monitoring students in
3 the rest room." So when I asked Mr. -- what was his
4 name? -- Mr. Pozzo, P-o-z-z-o, which is another
5 assistant principal, when I asked him about opening the
6 rest room he said it was for staff only.

7 Q Which rest room did you ask him to open?

8 A The one in the C wing when I wanted to use it
9 again before. But he said it was for staff only.

10 There were two other rest rooms that are
11 located on the second floor, which is the female and the
12 male rest room on the second floor of the C wing, and
13 both of those had hazard signs on the doors. And it
14 warned that you shouldn't enter into the rest room
15 because it was some kind of -- I forgot the name. It
16 was some kind of material or something was in there.
17 But it said "Warning. Do not enter." And it had a
18 brief note on the bottom saying that there was some kind
19 of chemical or something found in the rest room and it
20 would be dangerous to enter. And those stayed on for my
21 9th and the first -- like half on the first semester of
22 my 10th grade year.

23 Q The rest rooms that were located in the gym,
24 how many urinals were in that rest room?

25 A Only about two.

1 A No.

2 Q Did you see a soap dispenser in the gym rest
3 room?

4 A No. I don't know whether there was one in
5 there. I never did see one.

6 Q Did you see a paper towel dispenser?

7 A No, I didn't see one.

8 Q A hand dryer?

9 A No, I didn't see one.

10 Q Do you know if there was toilet paper in the
11 gym bathroom stalls?

12 A I don't know.

13 Q Did you notice any other problems with the
14 bathroom in the gym?

15 A The graffiti.

16 Q Where was the graffiti?

17 A It was located inside of the rest room on the
18 wall next to the door. And I don't know how much
19 graffiti it was in the stalls, but I know by the urinals
20 there was graffiti next to the door, on the door -- the
21 door panel, and then when you walk out it's like a small
22 hallway that you have to walk to get into the rest room
23 so there was graffiti all around that area too.

24 Q Do you know if that was ever cleaned up?

25 A No.

1 Q How many stalls?

2 A It was only one that I saw because the way they
3 were set was you have to actually walk over there to see
4 the stalls. So I never did use the stalls so I don't
5 know how many was actually in there, but I know there
6 was one that was right next to me for sure, but I don't
7 know how many was in there altogether in that row.

8 Q When you used the urinals -- I'm sorry. When
9 you went into that bathroom in the gym were the urinals
10 ever broken?

11 A No.

12 Q Did it have any sinks in the bathroom?

13 A Yes.

14 Q How many?

15 A I never did check because they would be -- I
16 know for -- it was -- the way -- the way it is there is
17 the stalls -- it's urinals, then it's the stalls set off
18 to the side, and then on this side it's the sinks.

19 Q So opposite of the stalls and urinals are the
20 sinks?

21 A Yes, opposite. You have to go into the urinals
22 to see everything, but the sinks will sit outside the
23 urinals. So when you walk in, the first thing you would
24 see was the urinals.

25 Q Did you ever try and use the sinks?

1 MR. FERNOW: You don't know or it was never --
2 THE WITNESS: I don't know.

3 BY MS. VANSE:

4 Q Anything else that you can think of with the
5 gym rest room?

6 A The hall that you have to walk through to get
7 to the rest room it was always dark. There was never
8 any lights on.

9 Q I'm sorry. How many times did you use the gym
10 rest room?

11 A Only about one time. One or two times. And I
12 want to add that was the rest room inside the small gym.
13 Because there's a small gym and then there is a large
14 gym.

15 Q Did you ever use the rest room in the large
16 gym?

17 A No.

18 Q Is that the multipurpose room?

19 A No. The large gym is the Willie E. West
20 Pavilion Gym. It's Willie, W-i-l-l-i-e, West, W-e-s-t,
21 Pavilion Gym. And that was for -- that was the gym that
22 was dedicated to one of the coaches who still teaches
23 there now. It was at his discretion who can use that
24 gym for whatever event. And that is the reason why we
25 never did use that gym for any PE activities. We only

1 used it when we were playing against his class or we
2 were playing with his class. So that is the only time
3 we used the gym. So if there were any rest rooms in
4 there I wouldn't know because I never used them before.

5 Q But you did use the rest room in the NPR room?

6 A In the NPR room, yes.

7 Q In that rest room, how many urinals and stalls
8 were in that rest room?

9 A I can't remember. I've only been in there once
10 and that was the second semester of my 9th grade year.

11 Q Do you remember if it had any sinks?

12 A I can't even remember.

13 Q Any soap dispenser?

14 A I can't remember.

15 Q Paper towel dispensers?

16 A Can't remember.

17 Q Hand dryers?

18 A Can't remember.

19 Q Toilet paper in the stalls?

20 A Can't remember. Because the only time I went
21 up in there was when they had -- we had some kind of
22 assembly, some tobacco-free assembly, Tobacco Youth
23 Prevention Education Program. And I was helping run
24 that event.

25 Q Did you notice any problems with that rest room

1 I got back in the classroom. But as far as if he
2 actually got in, I don't know.

3 Q Did you ever hear students complaining that a
4 bathroom was locked and they couldn't get in?

5 A No. You are talking about the environmental
6 room, right?

7 Q No. Actually, I'm glad you clarified that.
8 Anytime at all, any of the rest rooms.

9 A Anytime at all? As far as not being able to
10 get in, no. But there were times when the students
11 couldn't use the rest room because they weren't allowed
12 to.

13 Q How do you know that?

14 A Because every day we had this thing called
15 tardy sweep. And basically any students that are
16 outside the classroom after the tardy bell rings they
17 are taken to the NPR room. And part of that includes
18 the student not being able to go to the rest room for
19 the entire period -- well, some teachers don't let you
20 go the entire period at all. Other times some teachers
21 will tell you wait 15 minutes. And the rule was that
22 you have to wait 15 minutes before you go anywhere you
23 have to have a pass. But there are times where students
24 need to use the rest room and the teachers would not let
25 them.

1 when you went in, like graffiti or writing?

2 A There was graffiti at the entrance, at the
3 entrance of the doorway, but other than that I really
4 didn't go in. I just, you know, opened the door a
5 little bit and told anybody to come out.

6 Q Were there any rest rooms near the cafeteria or
7 the eating area?

8 A Cafeteria and eating area? There were none
9 that I could think of.

10 Q Other than the time with the environmental
11 building bathroom was there any other time that you
12 wanted to use the bathroom and it was locked?

13 A No.

14 Q Do you know if any other students tried to use
15 the rest room and found that it was locked?

16 A Only one time on one occasion. That's it.

17 Q What was that occasion?

18 A In my first semester of my 9th grade year. I
19 can't remember really what time, the time period in
20 between that semester, but it was only one time that I
21 could think of.

22 Q Did the student tell you about it?

23 A No. Because I was standing in the hallway and
24 he tried to use the rest room and it was locked. I
25 don't know if he eventually got in because by that time

1 Q Other than during the tardy sweep was there any
2 other time that you can think of when a teacher wouldn't
3 let a student use a rest room?

4 A During the lunch period sometimes the security
5 guard would close off the hallways. And I was
6 participating in making sure nobody -- none of the
7 students go into the hallway. But there was -- because
8 the rest room was right across from where my door was --
9 from where my station was, it wasn't a big problem for
10 me because the rest rooms are outside of the hallway in
11 the lobby area. And so it wasn't a big problem for me,
12 but there were times when students tried to go into the
13 C wing rest room and the security guard or the teacher
14 would tell them -- a security guard or a teacher would
15 not let them through. They will tell them they have to
16 go to another rest room outside of the building.

17 Q How many times do you remember that happening,
18 either in 9th or 10th grade?

19 A In my 10th grade year I remember that happened
20 about five times.

21 Q Do you know what -- would it be the security
22 guard that would talk to the student or the teacher?

23 A It would be the security guard or the teacher.

24 Q Do you know what your security guard or the
25 teacher said to the student?

1 A A lot of times -- I don't know exactly what
2 they told them, but a lot of times a lot of students
3 will come around to my side of the door where I was
4 watching and they will tell me, "Well, can I go in the
5 hallway?" And I will tell them, "No, you can't." And I
6 will have to tell them we are blocking off the hallway.
7 They don't want any student traffic in the hallways
8 during lunch and nutrition. And then I will point out
9 to them that there is a rest room right across from
10 where they are standing -- well, right across from where
11 I am.

12 Q When you told them that, will they go into that
13 rest room?

14 A Yes. A lot of students wouldn't even use the
15 rest room because they were so dirty. And that was part
16 of the reason why a lot of students didn't want to use
17 the rest room located in the lobby and that's why they
18 tried to use the ones located in the hallway.

19 Q How do you know the students wouldn't use the
20 rest rooms because they were dirty?

21 A Because sometimes when I point out to them the
22 rest room right across from me, even though they want to
23 go to the rest room, they will tell me "Well, I don't
24 want to use that one."

25 Q How many times did a student tell you they

1 In relation to the bathroom situation, the
2 teacher -- most times -- most of the teachers at the
3 school will tell you it is a tardy sweep, you can't go
4 to the rest room. Some will tell you you can go but you
5 have to wait 15 minutes and they will give you a pass.

6 Q They will tell this to the students that were
7 in the class?

8 A Yes.

9 Q How often would that happen that a teacher
10 would tell you that you couldn't go because it was a
11 tardy sweep?

12 A Almost every day. Because after a while they
13 started having tardy sweeps every day. It used to be
14 just on Fridays, where now they started having them
15 every -- every day.

16 Q The same time every day?

17 A Yes. It was all the periods. They had them
18 all the periods except for sixth period because a lot of
19 the students go home after fifth period so they kind of
20 cut loose on the tardy sweep during the sixth period.

21 Q Why would students go home after their fifth
22 period?

23 A Either they were seniors and they didn't have
24 any more classes or they were done. Some of them went
25 to work.

1 didn't want to use the rest room because it was dirty?

2 A I only had door duty probably about two times a
3 week and that was on a Monday and a Thursday, I believe.

4 Q Was that your sophomore year?

5 A Yes.

6 Q Both semesters?

7 A Yes. And those are the only times they will
8 tell me. So it will probably be about two times a week.

9 Q A student would tell you that every week?

10 A Yes. If not both two days, it will probably be
11 one day.

12 Q During the tardy sweep, that is another time
13 the students couldn't use the rest rooms?

14 A Yes.

15 Q And why was that?

16 A Because they were taken all the -- either the
17 teacher -- what happens is that all the students that
18 are not in class when the tardy bell rings, they make a
19 PA announcement to all the teachers to close the doors,
20 and all the students outside of the classroom when the
21 bell rings will then be taken to the NPR room, the
22 multipurpose room, and either -- I don't know what
23 happens after that. Sometimes the students said all
24 they did was sit in there the whole time, the whole
25 period.

1 Q Did some teachers allow students to use the
2 rest rooms during the tardy sweep with a pass or did
3 they all have to wait?

4 A Some teachers would allow students to go use
5 the rest rooms with the pass, but they will tell the
6 students that they have to wait 15 minutes after the
7 period had begun -- 15 minutes into the period. And
8 then the only time -- like a lot of teachers -- they had
9 this thing "No pass Friday." And those were like every
10 Friday and "No pass Friday" is the same as a tardy sweep
11 except for on Fridays no one can go anywhere. Everybody
12 has to be in class. So during those times no teacher
13 will allow any student to go to the rest rooms.

14 Q During class?

15 A Yes.

16 Q Do you know why that happened on Friday?

17 A No.

18 Q Did you ever ask a teacher to use the rest room
19 during class on a Friday and were told no?

20 A No.

21 Q Do you know of anyone who did ask a teacher to
22 use a rest room on Friday and was told no?

23 A Yes.

24 Q Who was that?

25 A Deja, D-e-j-a. Her last name is -- I can't

- 1 remember her last name.
 2 Q Anyone else?
 3 A That's it. That's all I know of.
 4 Q How do you know that she asked and was not
 5 allowed to go?
 6 A Because it was during [REDACTED] first
 7 period class and she just couldn't go. She got upset
 8 because she couldn't go. And when she got upset, the
 9 whole class knew because she was saying it for
 10 everybody. Not towards everyone, but, you know, it was
 11 loud enough for everybody to hear.
 12 Q Was that only one time or were there multiple
 13 times?
 14 A Multiple times. I really can't give you an
 15 estimate how many times but it was often.
 16 Q Did she ask other times other than Fridays?
 17 A Yes.
 18 Q Was she allowed to use the rest room on days
 19 other than Fridays during class?
 20 A No. A lot of times the teacher would tell her
 21 that she needs to wait until the bell rings because the
 22 bell is eventually going to ring. It was maybe only
 23 about once or twice where she actually let someone go to
 24 the rest room.
 25 Q Was this just your -- I guess it was

- 1 A Yes.
 2 Q Were all three not allowed to use the rest
 3 room?
 4 A On the "No pass Friday." Other than that, on
 5 the regular days, even though they had a tardy sweep,
 6 she would let them go, but she would tell them to wait
 7 15 minutes -- 15 minutes into the period. And what she
 8 would do is she would send her TA with the students into
 9 the rest room. And her TA, which is a teacher's
 10 assistant, was a student. Because she was a service
 11 worker -- because as an elective you can pick to be --
 12 choose to be a service worker for a teacher or an office
 13 and she had a service worker that period.
 14 Q So the TA was another student at Crenshaw?
 15 A Yes.
 16 Q Did you have teaching assistants in any of your
 17 other classes?
 18 A In my fifth period class, world history.
 19 Q So that is fifth period of your 10th grade
 20 year?
 21 A Yes. And basically all you do is help teachers
 22 grade papers. Or they can choose to work in another
 23 office that day -- with the teacher's permission they
 24 can choose to work in another office.
 25 Q Any other class that you had a teacher aide in?

- 1 [REDACTED]
 2 A Yes. [REDACTED] only one or two times she
 3 let people go to the rest room during the week or just
 4 on Fridays, on the "No pass Fridays."
 5 Q Do you know she let those students go?
 6 A I don't know.
 7 Q Any other times you can think of where a
 8 student wanted to use the rest room during class and was
 9 not allowed to?
 10 A In my sixth period Spanish class my 10th grade
 11 year.
 12 Q Was that just one time or multiple times?
 13 A It was maybe one or two times. On the "No pass
 14 Fridays" she never let anyone go to the rest room.
 15 Q Was that just -- how many students were
 16 involved with that? Just one student asking or two?
 17 A You're talking about constantly or --
 18 Q You said in your sixth period Spanish class
 19 your sophomore year there is also a student who wanted
 20 to use the rest room but the teacher wouldn't let them.
 21 A This happened with different students and it
 22 was different times of the semester.
 23 Q How many students total do you think asked?
 24 A Maybe about three.
 25 Q Three all semester?

- 1 A No.
 2 Q Any other occasions you can think of -- and
 3 this can be either on Friday or during the week -- where
 4 a student asked to use the rest room and the teacher
 5 told them they could not during class?
 6 A No.
 7 Q For the rest rooms that had the hazard signs,
 8 those were on the second floor of the C wing?
 9 A Yes.
 10 Q Do you know why these signs were there?
 11 A No. At first I thought it was just a joke as
 12 if a student had did it, but then I saw they constantly
 13 were being put up. And usually if a student puts them
 14 up, it is illegal or they are not supposed to be putting
 15 them up, then somebody would come and take them -- at
 16 least take them down. And then I saw it stayed up
 17 there. It stayed up there and it was never removed.
 18 Q How often would you go by those rest rooms?
 19 A Probably every day.
 20 Q Would this be your 9th and 10th grade year?
 21 A This is my 9th and 10th grade year, yes. And I
 22 would go up -- the reason why I would have to go past
 23 there is because I had to go -- instead of taking the
 24 first set of stairs when you are coming up the hall --
 25 well, when I'm coming up from the first floor to the

1 second floor, instead of continuing up to the third
2 floor I would continue to keep going past -- go up the
3 second set of stairs to go to the third floor because
4 the first set of stairs going to the third floor were
5 usually crowded so I would go up the second set of
6 stairs to the third floor.

7 Q Did you ever ask anyone about the hazard signs?

8 A No.

9 Q Did you ever hear anyone talk about them, other
10 students or teachers?

11 A I overheard other students saying "Look at
12 those signs." They was laughing about it. Other than
13 that, there were no other times. I seen teachers go
14 into them and didn't even take them down.

15 Q You saw teachers use the rest room?

16 A Yes.

17 Q Did you ever see anyone else go into the rest
18 rooms?

19 A No.

20 Q Would students ever cut school to use the rest
21 room somewhere else?

22 A I don't know.

23 Q If there was something wrong with one of the
24 rest rooms at your school, what could a student do?

25 A Probably go use another rest room or sometimes

1 there specifically for paper towels or whatever. But
2 the second time was when the student came back and said
3 that the rest room was locked.

4 Q The first time with the paper towels, what did
5 the teacher say, if you remember?

6 A The teacher had some paper towels he would have
7 given him.

8 Q What about the second time when the student
9 said the bathroom was locked?

10 A I don't know what was the result of that.

11 Q Any other times you can remember a student
12 coming back to class and telling a teacher about a
13 problem with a rest room?

14 A There was -- yeah. There was a time where a
15 student came back and they said the janitor was working
16 in the rest room.

17 Q Do you remember if it was your 9th or 10th
18 grade year?

19 A It was my 9th grade year, second semester.

20 Q What did the student say?

21 A The student just came back to the teacher and
22 said a janitor was working in the rest room.

23 Q Did he say anything like he couldn't use it
24 or --

25 A Yes, he said he couldn't use it.

1 they will go back to class.

2 Q Would you tell a teacher about it?

3 A Sometimes a student will say they are going to
4 the rest room -- I will be in the same class with them
5 and they will go back to the class and they will say the
6 rest room is locked or they don't have any paper towels
7 or something like that, and then the teacher will tell
8 them well, there is nothing that they can really do
9 because there is no other rest room that is open. Or
10 sometimes a student when they come back, they will
11 suggest another rest room is open and then they will say
12 that they are going to that other rest room that they
13 said was open.

14 Q Can you think of any specific times when you
15 were at Crenshaw when a student came back to a class and
16 told a teacher about a problem with the rest room?

17 A In my 9th grade English class, second semester.

18 Q Was that just one time?

19 A Yes.

20 Q What did the student say when she came or he
21 came back?

22 A Actually it was two times. Well, I don't know
23 which -- I know it was two times. There was one time
24 when they came back in and they said there were no paper
25 towels in the rest room. So I don't know if they went

1 Q What did the teacher say?

2 A I don't know what was the result of that.

3 Q Are there any other occasions when you can
4 remember a student coming in and telling a teacher about
5 a problem with the rest room?

6 A No.

7 Q Did you ever report any problems that you had
8 with a rest room to a teacher or the principal or
9 someone?

10 A To the principal.

11 Q When was that?

12 A That was my 9th grade year of the second
13 semester.

14 Q What did you tell him?

15 A I just told him that -- I asked him why was the
16 rest room locked. And then I asked Mr. Pozzo why the
17 rest room in the C wing on the first floor was locked
18 because I told him I had used it before and now we can't
19 use it. And he said well, now it's for staff. And then
20 I talked to him -- I asked -- when I asked him again to
21 use it another time during my first semester of my 10th
22 grade year, he said he would unlock it for me but he
23 never did come back. And this was during -- after
24 school.

25 Q When you talked to your principal, this was

1 just about a bathroom being locked?

2 A It was about the way they locked the rest rooms
3 because he said that they had a problem with graffiti so
4 they were going to only open one rest room. And he
5 really didn't know that the rest room in the
6 environmental building was always unlocked because the
7 teachers in the environmental building were unlocking it
8 and allowing the students to use it because they knew
9 that the rest of the rest rooms in the school were
10 locked and the only one they could go to was the one in
11 the lobby. So instead of having the students travel all
12 the way down to the lobby, they will have them use the
13 rest room in the environmental building.

14 Q About how long did your conversation with the
15 principal last?

16 A It was only about five or ten minutes.

17 Q Did you ever talk to him any other time about
18 the problem with the rest room?

19 A That was it. After I talked to him about it
20 he -- well, he told me that other students were saying
21 the same thing. After I talked to him about it I
22 noticed that a lot of times when we have our homeroom
23 announcements during second period or during sixth
24 period -- they have something to say on the PA before
25 all the students leave -- they will talk about how they

1 for the students. Because if you saw a teacher walking
2 down the hall and he was going to the rest room, he
3 would say you still cannot use it -- the students could
4 not use it.

5 Q How do you know that?

6 A Because they will tell them no, you know, don't
7 come in or you just can't use it.

8 Q Did you hear a teacher say that to students?

9 A Yes.

10 Q How many times?

11 A Different occasions. I really can't give you a
12 count because sometimes it was -- like when I was
13 walking down the hallway to class you would see
14 something like that going on.

15 Q Did you ever see any students put graffiti on
16 the walls in the bathrooms?

17 A No.

18 Q Did you ever see any students like clogging the
19 sinks or the toilets?

20 A No.

21 Q Did you and your friends ever talk about the
22 problems that you had with the bathrooms?

23 A Yes.

24 Q How many times did you discuss it?

25 A I really can't remember. Maybe only about two

1 want people to turn in taggers or they would like the
2 students to stop tagging in the rest rooms.

3 Q Do you think that helped?

4 A I don't think it did because even after --
5 after a while I noticed that it was the same tagging
6 marks in the rest room so I didn't really see anything
7 new in the rest rooms. But even after I noticed there
8 was a change in the rest rooms, they never did repaint
9 the rest room and they never did open up any more rest
10 rooms. So I didn't see the point in the taggers and --
11 you know, whoever was doing it -- I didn't see the point
12 in them trying to stop the tagging because they still
13 didn't open any more rest rooms up or anything. Because
14 I felt as if -- I felt as if the rest rooms that were
15 open all the time, they were all given to the teachers
16 and the students were no longer able to use them.

17 Q Why did you think that?

18 A Because I always see teachers going in, but the
19 students couldn't use them. The teachers didn't want to
20 unlock the rest rooms for the students.

21 Q Do you know if students couldn't use them or if
22 they had to get a teacher to help them?

23 A Well, it depends on who the teacher is also.
24 Because sometimes a teacher will open them up. It was
25 very seldom when the teacher would open the rest room

1 times.

2 Q Would that be two times your whole career at
3 Crenshaw?

4 A Those two times were during my 9th grade year
5 of my second semester.

6 Q How about the first time, why were you
7 discussing it then?

8 A We were discussing it because one of the
9 students, they had to use the rest room but wouldn't ask
10 the teacher because she didn't like the conditions of
11 the rest room so she just decided not to use the rest
12 room.

13 Q What student was this?

14 A Shannon Hamilton. S-h-a-n-n-o-n, Hamilton,
15 H-a-m-i-l-t-o-n.

16 Q How about the second time?

17 A The second time?

18 Q That you talked with a student or you just were
19 talking with your friends about problems in the
20 bathrooms.

21 A I know it was during the 9th grade because she
22 left -- she left.

23 Q That was Shannon also?

24 A Yes. Because she always complained about the
25 rest rooms.

1 Q She always complained about it to you?
 2 A Yes. Because I sat right in front of her --
 3 whenever she would start complaining I would hear her.
 4 Q What class?
 5 A She was in my health class.
 6 Q How many times did she complain about it?
 7 A Only about once or twice to me. I don't know
 8 of any other time. She probably did complain other
 9 times, but I wouldn't know.
 10 Q Did you hear her talking about it other times?
 11 A No.
 12 Q Any other conversations that you had with
 13 friends or people at school about the bathrooms at
 14 Crenshaw?
 15 A Other students who participated in Community
 16 Coalition.
 17 Q How many times did you talk about the bathrooms
 18 at Crenshaw at the Community Coalition?
 19 A Probably five times.
 20 Q Would this be five times total in your 9th and
 21 10th year at Crenshaw?
 22 A Yes.
 23 Q What would you talk about during the five times
 24 at the Community Coalition? Was it basically the same
 25 type of problems or what did you talk about?

1 A Yes, the same type of problems.
 2 Q Were there any suggestions on what to do about
 3 the problems?
 4 A Yes.
 5 Q What were those?
 6 A They -- well, I didn't participate, but there
 7 was a protest staged on the conditions of the school and
 8 the rest rooms.
 9 Q These were the conditions at Crenshaw?
 10 A In the schools that participated in the
 11 Community Coalition.
 12 Q What schools are those?
 13 A Crenshaw, Fremont, Washington, Manual --
 14 Q Is that Manual or Emanuel?
 15 A Manual. It's Manual Arts. And there was --
 16 that was it.
 17 Q When was this protest?
 18 A I don't really remember because I didn't
 19 participate. But it was -- I was told that it was right
 20 in front of the Wells Fargo building right there on the
 21 corner.
 22 Q Downtown?
 23 A Yes.
 24 Q Did anyone tell you when that took place?
 25 A No. I knew when it was going to take place,

1 but I -- I don't know -- I mean I just can't remember.
 2 I can't remember because I didn't participate. So it
 3 wasn't something like a significant date.
 4 Q Do you know if it was while you were at
 5 Crenshaw?
 6 A Yes.
 7 Q Do you know if it was during your 9th or your
 8 10th grade year?
 9 A It was during my 9th grade year.
 10 Q Did anything happen as a result of that protest
 11 that you know of?
 12 A I don't know.
 13 Q Any other suggestions about what to do that the
 14 Community Coalition thought of?
 15 A I don't know if they had a meeting with someone
 16 or anything like that. I don't know.
 17 Q During the times that you discussed the
 18 bathroom problems at Crenshaw with the Community
 19 Coalition, were there any other suggestions about what
 20 to do about the problems?
 21 A About any suggestion? Talk to the principals.
 22 And they made suggestions for -- well, with the
 23 principals for how to get the janitors involved or
 24 something like that, where they don't have to watch the
 25 rest rooms but have something where they can control who

1 goes in and who goes out of the rest rooms.
 2 Q Anything else?
 3 A That's the only thing that I know of. They
 4 also suggested -- well, back to the janitor thing --
 5 that the rest rooms need to be fixed. That's all that I
 6 know of.
 7 Q Did you ever use the locker room at Crenshaw?
 8 A Locker room as in --
 9 Q Was there separate --
 10 A There were locker rooms in the hallway and
 11 there were locker rooms in the locker room in the gym,
 12 the gym locker room.
 13 Q Did you ever use the gym locker room?
 14 A Yes.
 15 Q How often did you use that?
 16 A I used it every day in my 9th and 10th grade
 17 year. I mean my 9th grade year.
 18 Q Was this for PE?
 19 A Yes.
 20 Q Can you describe what the locker room was like,
 21 like the physical aspects?
 22 A The physical aspects as in what it looks like?
 23 Q Did it have graffiti? Was it dirty?
 24 A Yes.
 25 Q Where was the graffiti?

1 A The graffiti was all over the lockers. It
2 wasn't real -- like real bad. It wasn't like a big
3 problem, but it was on the lockers. It was visible on
4 the lockers. There was graffiti on the wall. And quite
5 a bit of graffiti on the display cases -- well, former
6 display cases. And you could see where a coach probably
7 wrote something on the board. And it looked like as if
8 he wrote it not realizing -- well, not caring what he
9 wrote on it with.

10 Q Any other problems that you saw?

11 A And then there were staples in the boards. The
12 display case is where they posted old fliers or posters.

13 They also had fire extinguishers by some of the
14 lockers that were easily accessible to the students so
15 there weren't any fire extinguishers in the cases. We
16 weren't able to use the showers either.

17 Q Why not?

18 A I don't know.

19 Q Do you know if they were broken?

20 A I was told by a PE teacher they were broken,
21 but we just couldn't -- we just didn't use them. They
22 told us that we don't use them. They told the students
23 that they don't use them.

24 Q Did the teacher tell you this at the beginning
25 of the semester?

1 A I didn't ask because other students would ask
2 because their lockers were located right next to the
3 office. So out of those ten times I would say about six
4 times the PE teacher came in and turned on the lights.
5 And the thing with the lighting is that even with the
6 lights on -- I mean you can tell that some lights are
7 busted and a lot of the lights don't work so there could
8 be more lights put in.

9 Most students still complained because they are
10 coming in from out of the heat and the hot sun, and
11 after being in the sun all of a sudden you have to enter
12 into a different type of lighting; some students talked
13 about the walls looked blue or something like that from
14 being out in the sun and then going into a room where
15 the lighting has changed dramatically.

16 Q Did you ever see any lights that were broken
17 or --

18 A Yes. Right near my locker.

19 Q Any others?

20 A There were some lights over on the far end, the
21 north side of the locker room. And I noticed that a lot
22 of students didn't use those lockers on the north side
23 of the locker room. And that is also where the fire
24 extinguishers were located.

25 Q Do you know why they wouldn't use those

1 A Yes.

2 Q Did you ever ask a teacher to use a shower?

3 A No.

4 Q Any other problems you can think of with the
5 locker room?

6 A The lighting. There wasn't enough lighting in
7 there. Sometimes the lights will go out. And that is
8 usually on the days when it rains. But sometimes when
9 it doesn't rain the lights still go out. Sometimes we
10 will walk to the locker room and the lights are out.

11 Q Did you try and turn them on?

12 A No, we couldn't. Because you needed a key to
13 turn on the light switch.

14 Q So what would you do?

15 A They will go find a teacher and ask them to
16 turn on the lights. Most of the times they will come
17 and turn on the lights, but sometimes they will tell us
18 the lights were out or they just didn't turn them on.

19 Q How many times when you went into the gym
20 locker room were the lights out?

21 A It was probably only about ten times.

22 Q That would be for the entire 9th grade year?

23 A The 9th grade year.

24 Q How many times did you ask the teacher to turn
25 on the lights and he didn't?

1 lockers?

2 A I don't know. They could have been used during
3 a different period. Because for all the students that
4 take PE, they were definitely in use, but I never saw
5 any students during my period go over there. But you
6 can tell that those lockers were used because sometimes
7 you will see like a strap hanging out of somebody's
8 locker on the far end. I know my brother had his locker
9 close to that end.

10 Q And they had the broken lights close to the
11 fire extinguisher?

12 A Yes.

13 Q Any other lights that you noticed that were
14 broken?

15 A Lights in the hallway area. Where you walk
16 into the locker room, it is like a small hallway. It is
17 like a small hallway and the lights there didn't work
18 either. It was like -- it's like -- it is not like a
19 hall. It's smaller than a hall. It's more like
20 somewhere where you can sit in between the locker room
21 and to exit the building.

22 Q The lights that were above your locker, did
23 they work at all?

24 A No. There was also another light that was
25 above my locker, but it was kind of set off towards the

1 walkway and sometimes it would blink. It would flash
2 like a blue and it will be real, real dim. And then
3 sometimes it will be dim and then it will just cut off
4 and it just doesn't come on at all.

5 Q Was the light above your locker ever fixed?

6 A No.

7 Q How about the lights -- I guess it was at the
8 north side where the fire extinguishers were, what was
9 wrong with those lights?

10 A I don't know. They just chose -- it appears as
11 if there was another switch that turned on those lights.
12 But you'd figure that because students did use the
13 lockers they would turn on those lights and so most --
14 you will see a light in different sections -- lights
15 were turned on in that area, but the majority of the
16 lights in that area were off. A lot of times you will
17 see where the -- there was like this fencing that
18 goes like -- that goes across the lights. It is sort of
19 like a cover and you can see where one of them fell off
20 or some of them were missing the fencing part and they
21 just weren't on.

22 Q Did you ever ask your PE teacher about those
23 lights?

24 A No.

25 Q Do you know if anyone else did?

1 Q But did this happen like every week or every
2 day? Do you remember?

3 A Whenever we had to go turn on the lights.
4 Whenever a student requested that they turn on the
5 lights. But on other days it just wasn't on. If the
6 lights weren't already on when we walked in, it wasn't
7 on at all.

8 Q For the times when your PE teacher would not
9 turn on the lights, what would you do? What would the
10 students do?

11 A They would just get dressed and -- some of the
12 students would go into the walkway area because there
13 was light coming in from the door and they would get
14 dressed over there.

15 Q Would your PE teacher ever tell you -- I think
16 it was a she.

17 A My teacher was female so she was in the female
18 locker area so I wouldn't know about their locker room.
19 But the male PE teachers, those were the ones that
20 had -- who had to make the decision over whether they
21 turned on the lights or not.

22 Q But did they ever tell you why they wouldn't
23 turn them on?

24 A No. And then there were other times where if
25 the PE -- if they wanted us to hurry up they will tell

1 A No. I don't know.

2 Q Did your brother ever say anything about those
3 lights?

4 A I don't know. He had PE a different period
5 than I did.

6 Q Did he ever talk you about it at home or any
7 other time?

8 A No.

9 Q What was wrong with the lights in the small
10 hallway of the locker room?

11 A There just wasn't any lights at all.

12 Q The other light, where was the light that kept
13 blinking or was very dim?

14 A It was offset from my locker. It was like in
15 the walkway area. Because the way -- my locker was not
16 next to the walkway area where you walk past all the
17 lockers, it was probably about two or three lockers off
18 from that walkway area.

19 Q How many times do you remember it blinking?

20 A Quite a few times. Usually it started blinking
21 when the lights were out. And then somebody would come
22 and turn them on and then that light, it would start
23 blinking like it was getting ready to turn on, but then
24 eventually the light would blink and then it would turn
25 off.

1 us they are going to turn off the lights and they will
2 start counting down.

3 Q How many times did that happen?

4 A That happened probably about twice a month.
5 There was one person in particular who always did it,
6 but I can't remember his name right now.

7 Q This was another PE teacher?

8 A Yes.

9 Q Any other problems that you had with the gym
10 locker room?

11 A That's it.

12 Q Did you ever see any mice in any of your
13 classes at Crenshaw?

14 A No.

15 Q Did you ever hear of anyone that saw a mouse in
16 their classroom?

17 A My brother.

18 Q What was that?

19 A It was -- I believe it was in his English
20 class. There were some tiles missing and -- he said it
21 was only one occasion where he saw a mouse go through --
22 go across a pipe.

23 Q Any other times you heard of someone seeing a
24 mouse in a classroom?

25 A There was only one other time when someone told

1 me they saw a mouse -- a mouse in a classroom. That was
2 in my ECP class, but that was a totally different
3 period.

4 Q What did the student tell you then?

5 A They just told me that they saw a mouse in the
6 classroom. That was it.

7 Q Did they say it was in the ceiling or on the
8 floor?

9 A In the ceiling -- going across the -- again in
10 the ceiling but going across the pipes again. And when
11 I say going across the pipes, whatever is inside that
12 ceiling, which is like heating tubes or whatever they
13 have in that ceiling. Because most of the things that
14 was in that ceiling were pipes and insulation tools.

15 Q How would you know that?

16 A Because when they were open you can -- it is
17 just a whole bunch of either bars or tubes.

18 Q Other than the ceiling in your ECP class, do
19 you remember any other classrooms that you had that had
20 ceiling tiles missing?

21 A There was one missing from [REDACTED] class,
22 but I think they were working on something. That was
23 only gone for about two days and they eventually put
24 that one back in. That's it.

25 Q Did you ever see a rat in any of your classes

1 don't mean once in the middle of the second semester.
2 Once in the middle of the first semester and whatever
3 other time it happened. It was like twice. I really
4 can't remember.

5 Q When you saw the roaches in your ECP class, was
6 it just one or were there several?

7 A It was just one. On both occasions it was just
8 one.

9 Q What happened? Did the teacher do anything?

10 A No. Because it had ran away. I know one time
11 a student did step on it.

12 Q How about the time in your algebra class?

13 A Once. And the student stepped on it.

14 Q Did you just see a roach one time?

15 A Yes.

16 Q That was when the student stepped on it?

17 A Yes.

18 Q Did any other students tell you about any of
19 the times that they saw a roach in class?

20 A No.

21 Q Have you seen any other pests at Crenshaw, like
22 a bird or a bug?

23 A My brother -- his English teacher -- they had
24 this bird that lived in the ceiling and it would come
25 through -- the same bird would go in and out the same

1 at Crenshaw?

2 A No.

3 Q Did you ever hear of anyone seeing a rat in any
4 one of your classes at Crenshaw?

5 A I thought you asked that question before.

6 Q I asked you about mice.

7 A I wouldn't know the difference between mice and
8 rats, so --

9 Q Fair enough. How about any cockroaches, did
10 you ever see any of those in your classes?

11 A Yes.

12 Q What classes did you see those in?

13 A In my ECP class and [REDACTED] class.

14 Q Any others?

15 A That's it.

16 Q How about your 10th grade year, any of those
17 classes?

18 A 10th grade year, no.

19 Q When did you see cockroaches in your ECP class?

20 A It was only maybe about twice. It was twice.
21 About two times. And other students will see it and
22 they will just jump up in the air. Everybody will know
23 it's a roach. It was only about two times. It wasn't
24 like a reoccurring thing constantly. It was only maybe
25 about once in the middle of the second semester and -- I

1 window every day and it made a nest right on the -- the
2 ceiling was open right by the window and the bird -- it
3 would -- what it would do, sometimes it will come in by
4 the window, sit at the window. And there were desks by
5 the window, so if nobody was sitting by the window
6 sometimes the bird will come in, sit at the desk, fly up
7 to the ceiling. And there was a nest located right at
8 the opening of the ceiling. Like if you were standing
9 at a certain angle and looking at the ceiling you would
10 see where the nest was inside the ceiling. And that was
11 the only time.

12 And the reason I know about that is because I
13 went to my brother's class one day and it was during
14 nutrition and I saw the bird come in and asked my
15 brother about it. He said that the bird -- they named
16 it and everything. He said the bird always comes in.

17 Q Do you know if the ceiling where the bird was
18 in that class was supposed to be open?

19 A It had been left open during the whole
20 semester.

21 Q Were there like ceiling tiles missing? Is that
22 why the bird could get there?

23 A Yes.

24 Q Any other occasion where you heard of any other
25 type of bugs or animals at Crenshaw?

- 1 A A bug came out of my friend's backpack. That
2 is also in [REDACTED] class.
- 3 Q Anything else?
- 4 A That's it.
- 5 Q How about the campus in general, did you ever
6 see any mice on campus? Maybe not in a building, but --
- 7 A Not any mice or rats.
- 8 Q How about roaches? Any roaches --
- 9 A I've seen a few like by the -- behind the stage
10 area next to the quad. That was only maybe once or
11 twice.
- 12 Q Was that outside?
- 13 A Yes. And there was one in the hallway that I'd
14 seen.
- 15 Q Did you ever hear students ever talk about any
16 other mice or rats or roaches on campus?
- 17 A Other than that, no.
18 Do you want birds too?
- 19 Q Birds. Sure.
- 20 A There are a few times where birds flew into the
21 hallway and they will go into the hallway and then
22 people will try and catch them and instead of catching
23 them they will kill them. I mean they -- they would do
24 more harm than good.
- 25 Q How many times did that happen?

- 1 A That happened about three times.
- 2 Q That was the whole time you were at Crenshaw?
- 3 A Yes. There was one occasion where I realized
4 that the bird was still in the hallway while I was in my
5 leadership class and sometimes what the leadership class
6 will do, they will select a group to sweep the hallway,
7 just in the main building. So it will make the
8 janitor's job a little bit easier. And I realized that
9 the bird was still in the hallway. So what I did was I
10 just -- I didn't pick it up. I picked it up with the
11 little thing -- what is it called? It's like a dustpan,
12 but it has maybe like a box that's on the end of the
13 stick. And I picked it up with that because the
14 janitors gave us equipment to sweep. I took it outside
15 and took it to the janitor's area. I just put it in a
16 bag and tied it up and put it in the trash can because
17 it was already dead.
- 18 Q Do these birds all fly into the same hallway?
- 19 A Sometimes it is on different floors. And I
20 don't know how they get in. Probably through the door
21 and they walk up the floor or something. But usually it
22 is on the third and the second floor.
- 23 MS. VANSE: I'm going to take a break.
24 (Recess.)
25 BY MS. VANSE:

- 1 Q There was a library at Crenshaw, right?
- 2 A Yes.
- 3 Q How often would you use the library?
- 4 A I probably used the library every day.
- 5 Q What would you use it for?
- 6 A To do research. And sometimes I would use it
7 to develop my Web page.
- 8 Q How big was the library?
- 9 A It was a pretty large library. It was
10 probably -- I could give you a measurement of --
11 probably from -- I'm trying to look at this room here.
12 I'm trying to get a measurement.
- 13 Q It was obviously bigger than a
14 classroom?
- 15 A Yes. Well, I could probably -- it was probably
16 two times bigger than the classroom.
- 17 Q Do you know what kind of resources it had?
- 18 A They have books. And then, of course, they
19 have computers where you can do the Internet research.
20 They have videos so the teachers can check out the
21 videos and they all also have cassette tapes with
22 teachers.
- 23 Q How many computers are in the library?
- 24 A They had these -- it was like a computer
25 carousel. On every one they had about five computers.

- 1 And they had three sets of those. So it was about 15
2 computers. And they had two sets off to the side,
3 computers.
- 4 Q So about 17 total?
- 5 A Yes.
- 6 Q Were there other computers at the school?
- 7 A They had computers in some of the classrooms.
- 8 Q What classrooms had computers?
- 9 A My classrooms or --
- 10 Q Let's start with your classrooms.
- 11 A Okay. My classrooms for my first semester and
12 second semester of my 9th grade year, my second semester
13 English class had computers. Let's see. My -- I can't
14 remember my schedule back then. I might need help with
15 this one.
- 16 Q Did you have any computers in your algebra or
17 your math investigations class?
- 18 A No.
- 19 Q How about your education and career planning
20 class?
- 21 A No.
- 22 Q Spanish 1 or 2?
- 23 A No.
- 24 Q Your science classes?
- 25 A Science class, no.

- 1 Q You did have one in your second semester
2 English?
- 3 A Yes.
- 4 Q How many computers did you have in that class?
- 5 A There was -- for my second semester English
6 there was only one computer. That's it.
- 7 Q Did you ever use it during class?
- 8 A No.
- 9 Q I'm guessing you probably didn't have any in
10 your PE class.
- 11 A No.
- 12 Q For your 10th grade year did you have any
13 computers in your English class?
- 14 A No.
- 15 Q Biology?
- 16 A Wait. Going back to the English class, there
17 was one computer in there and that one had just been put
18 in for the second semester, but I never did get the
19 chance -- I know the teacher used it. And I never heard
20 of any student asking to use it. And it was a new
21 computer because it had just came in for the second
22 semester. And I don't know if they use it now, if the
23 students use it now or not; but I know while I was there
24 we just didn't use it. Nobody bothered to ask the
25 teacher if they could use it or not.

- 1 Q How about in your biology class?
- 2 A Yes.
- 3 Q How many computers did you have there?
- 4 A There were a total of five computers.
- 5 Q Did you use those during class?
- 6 A Yes. Sometimes.
- 7 Q What would you use them for?
- 8 A I would use them to do research for biology.
9 Sometimes if I had a little bit of time left over from
10 the class and I would use it to do homework for my other
11 classes such as my English class.
- 12 Q In your algebra class your sophomore year?
- 13 A In my algebra class there was two computers
14 but -- no. There was one computer but the teacher only
15 used that computer.
- 16 Q For your world history class?
- 17 A World history there was two computers and
18 students did use both of them. But eventually they only
19 started to use one computer because the other one was an
20 older model.
- 21 Q Did you have any computers in your 10th grade
22 Spanish class?
- 23 A My 10th grade Spanish class there was one
24 computer, but the teacher would use that one only.
- 25 Q Did you have any computers with leadership, in

- 1 the leadership class?
- 2 A Yes.
- 3 Q How many did you have?
- 4 A There was about -- about five computers.
- 5 Q What would you use those for?
- 6 A To again do Internet research or type my
7 report. And most of the time I will use it to put
8 together -- I will use it to put together my schedules
9 for my events. I used it to put together my lists for
10 my committees and a list of activities that I planned on
11 doing. And I will use it sort of like -- for sort of
12 like a planner. Because sometimes if I forget what
13 activities I was going to do for a certain month, then I
14 will go back and refer to it on the computer.
- 15 I also used to chat with other students from
16 other high schools because it came with this -- it was
17 new program that this Internet-based company came up
18 with and it's to where you can make your own school Web
19 site and you can chat with other students from different
20 schools.
- 21 Q Do you know what company you worked with, what
22 Internet company?
- 23 A No. Because there was an acronym, but I forgot
24 the acronym for it.
- 25 For my Spanish class even though the teacher

- 1 only used a computer, I do recall seeing one student use
2 the computer.
- 3 Q That was your 10th grade Spanish?
- 4 A Yes.
- 5 Q Were there any other computers other than the
6 library or in the classrooms that students could use?
- 7 A There were computers in the College Center.
- 8 Q How many computers were there?
- 9 A I can't remember. I never did count them.
- 10 Q Did you ever go in and use those computers?
- 11 A Yes.
- 12 Q About how many times?
- 13 A Maybe about two times.
- 14 Q So you mostly used the computers in the
15 library?
- 16 A Yes.
- 17 Q Did you ever have any problems like having to
18 wait in line to use the computers with other students?
- 19 A Sometimes the computers -- well, almost every
20 day the computers in the library were already taken, but
21 if they were taken I would go upstairs to the leadership
22 room and I would use the computers in the leadership
23 room.
- 24 Q Was there ever a time when you wanted or needed
25 to use a computer at school and you couldn't?

- 1 A No.
- 2 Q Did you ever hear any other students complain
3 that they couldn't use a computer?
- 4 A Yes.
- 5 Q When was that?
- 6 A There were times when I would go in the
7 library -- I really can't give you a specific day or how
8 many times because it varied -- the times varied when I
9 went down to the library. If all the computers were in
10 use, I could always go to another place to use another
11 computer. So every now and then I would hear a student
12 saying there weren't enough computers because they
13 needed to do some homework and they couldn't because
14 other students were using them.
- 15 Q Do you know if those students were able to use
16 any other computers at the school?
- 17 A I don't know. There were a few times where the
18 students were -- where some students would come up from
19 the -- they will go to the leadership room and use
20 computers from the library.
- 21 Q Students that weren't in the leadership class?
- 22 A It was students that were and were not in the
23 leadership class.
- 24 Q So the computer in the leadership class they
25 weren't restricted to just leadership class students?

- 1 A No. During class they were because that's the
2 time we usually strategized what we were going to do for
3 that week or when we have our formal meetings. So
4 during the class only the leadership students could use
5 it because that was the only time we do most of our
6 planning and that was like deep concentration. So we
7 don't allow any other disruption from any other students
8 that are outside from leadership, but during lunch and
9 nutrition they are free to come up anytime.
- 10 Q Did you ever see other students that weren't in
11 the leadership class using those computers?
- 12 A Yes.
- 13 Q Was that something that you think happened
14 often?
- 15 A Yes.
- 16 Q Did you ever see any students in any of your
17 classes that had to use stray boards to write on during
18 the class?
- 19 A Use?
- 20 Q Stray boards.
- 21 A Stray boards?
- 22 Q Like just a board instead of a desk or a table.
- 23 A No.
- 24 Q Earlier when you were talking about textbooks
25 you said it was the students' responsibility to take

- 1 care of the textbooks?
- 2 A Yes.
- 3 Q Was that in every class?
- 4 A Only the classes where we were able to take the
5 textbooks home. And if we were able to take the
6 textbooks home, we would fill out a textbook card
7 that -- and it's a blue card and a white card. One copy
8 will stay with the teacher and the other copy will go to
9 the textbook room and it will let the textbook room know
10 that that student has checked out a book and is allowed
11 to take that book home. And if anything happens to that
12 book, then the student is responsible for paying for it.
- 13 Crenshaw came up with a new system where
14 they scan the books, they put bar codes in the books,
15 and so in some classes they no longer need to use the
16 blue or white cards. And they just started that system
17 in my 10th grade year.
- 18 Q Was that the second semester or the first?
- 19 A My first semester.
- 20 Q What about the book covers, did all the books
21 have covers on them? Separate from the actual textbook,
22 an additional cover.
- 23 A Yes.
- 24 Q Was that on all the books?
- 25 A In my health class all the books had book

- 1 covers. And the teacher made sure that all the book
2 covers were on the books. But those books we could not
3 take home.
- 4 Other books that we could take home, sometimes
5 a teacher would see if we actually -- sometimes a
6 teacher would check to see if we put book covers on the
7 books. Sometimes the teacher won't check at all.
8 Usually that check occurs when we first enter into
9 school and first receive our textbooks.
- 10 Q Was the decision whether or not a book had an
11 additional cover something that a teacher decided or was
12 there a school policy or a rule, if you know?
- 13 A Usually the textbook room personnel will
14 recommend it, but the teacher, sometimes they wouldn't
15 enforce it. Other teachers would recommend that you get
16 a textbook cover. And there were other times when the
17 teacher just didn't say anything.
- 18 Q Did you notice that the textbooks that had the
19 additional covers were usually in better condition or
20 they were taken better care of?
- 21 A Not the ones in my health class, the textbooks
22 in my health class. Those had book covers, but those
23 weren't in such good condition. The newer textbooks
24 that we could not take them home, those did not have
25 book covers. So it was most of the older -- older books

1 that had book covers. Except for the books in my
2 biology class, those did not have book covers.

3 Q Do you know why those didn't, your biology
4 books didn't have book covers?

5 A The teacher never did tell us to put any on so
6 the students didn't.

7 Q Did you ever see any students writing in
8 textbooks?

9 A No.

10 Q Did you ever see any students throwing their
11 books or tearing pages?

12 A No.

13 Q When you were allowed to take a textbook home
14 from a class, did you follow the same policy -- with the
15 card or with the bar code?

16 A The same policy with the --

17 Q Could you ever take a textbook home that you
18 didn't have to check out or scan with the bar code? It
19 was just yours for the semester?

20 A No.

21 Q Did you ever take a textbook home and forget to
22 bring it back to school?

23 A Bring it back to school as in?

24 Q Like the next day for class.

25 A The next day for class? No, because I pretty

1 did lose textbooks, but I didn't know them.

2 Q How do you know they lost their textbook?

3 A Because when I would go to the textbook room or
4 whenever we would go to the textbook room to check out
5 books, there will be students who will be scanned --
6 their books will be scanned and they will tell them "You
7 still have this book out." And they will ask them
8 "Well, where is the book?" And they will tell them,
9 well, they don't have the book anymore or sometimes the
10 textbook personnel will say "Do you have a brother that
11 goes here?" And they will say yeah. Well, your brother
12 or your sister forgot to return this book before they
13 graduated or something like that.

14 Q These would be students that were like in front
15 of you in line or something like that?

16 A Yes.

17 Q Do you know about how many times that happened,
18 you heard about -- or a student in front of you who had
19 forgotten or had lost a textbook at the textbook room?

20 A Probably about two or three times because we
21 only went to the textbook room during the beginning of
22 the semester. So for every semester I only went
23 probably about five times because four -- only four or
24 five out of my six classes had -- I actually had a book.

25 Not had a book but had to go pick up books or had to go

1 much kept all my stuff together. Because if I was
2 studying with my book in my study area at home, I have a
3 backpack right there so whenever I get done with my
4 textbook I will just put it in my backpack right when I
5 get done; unless I knew we weren't going to use the
6 textbook the next day I will leave it out.

7 Q Did you ever see or hear any other students who
8 would forget to bring their textbook back to class?

9 A Yes.

10 Q How many times would that happen?

11 A It would vary in different classes. I really
12 can't count.

13 Q What would happen if a student forgot to bring
14 their textbook back to class?

15 A Sometimes the teacher would tell them to share
16 with another student or the teacher would give them an
17 extra copy just to borrow for that day or for that
18 period and then at the end of the period they will just
19 have to return the book.

20 Q Did you ever lose a textbook at Crenshaw?

21 A No.

22 Q Did you ever hear or know of any students who
23 did lose a textbook?

24 A Quite a few times. But nobody in particular I
25 could think of right now. There were some students who

1 to the textbook room for a book or something like that.
2 Or sometimes I will just go down to deliver books. That
3 was really mainly the reason I went down to go to the
4 textbook room was to either deliver books or pick up a
5 book for another class or something like that.

6 Q I think you told me last time that you had
7 checked in books for your algebra class?

8 A Yes.

9 Q Did you ever do that for any other class?

10 A No.

11 Q When would you be delivering books?

12 A During fourth period, my leadership class.

13 Because leadership class, I have a lot of time to do a
14 lot of stuff. It is just like a regular -- it is a
15 regular period except for I spend most of the time
16 running errands trying to get some of the activities I'm
17 preparing to do done. Sometimes a student will leave a
18 book lying around and the teacher will tell me to take
19 it to the textbook room, get it scanned, and see who it
20 belongs to or something like that.

21 And then sometimes I go down to put -- a lot of
22 times when I finish my events I will have to get some of
23 the -- the crew who does the radio work, I will have to
24 get them to take the radios -- not the radios, but the
25 amplifiers and the sound system and all that back down

1 to the textbook room because there was a lockup in the
 2 textbook room where we put the new sound equipment in.
 3 Q You are now at Washington High School, right?
 4 A Yes.
 5 Q You've been there since March?
 6 A Yes.
 7 Q How do you like being at Washington?
 8 A Washington is pretty much okay. It's closer to
 9 where I live.
 10 Q Are there things that you like at Washington
 11 better than you like at Crenshaw?
 12 A Yes.
 13 Q What?
 14 A The drama program that they have there.
 15 Q Anything else?
 16 A And the way the magnet program is set up.
 17 Q How is the magnet program set up at Washington?
 18 A What they did was instead of having just a
 19 general magnet like Crenshaw did, other than a teacher
 20 training magnet at Crenshaw, they broke it down into
 21 different categories based on -- you have the
 22 opportunity to choose which magnet you want to go into.
 23 There's communication arts magnet. There's math and
 24 science magnet, which I participate in. There's --
 25 there's like a drama and music magnet. And there's --

1 did I mention communications magnet?
 2 Q Yes. Communication arts.
 3 A There's another magnet that I can't think of
 4 right now. But that is one is where the A team -- a lot
 5 of people from the A team, which is a team that set up
 6 all the sound equipment -- this is group of students
 7 that set up all the sound equipment for the school.
 8 They basically learn how to work with stage production
 9 and different activities such as that.
 10 Q Those are the only magnets that they have,
 11 those four?
 12 A Yes.
 13 Q How do you get into one of the magnet programs
 14 at Washington?
 15 A You can talk to your counselor -- to the
 16 counselor. As far as how I got in, since I was already
 17 in the magnet at Crenshaw they recommended that I go
 18 back into magnet, except for I can now get specific with
 19 what magnet I want to get into.
 20 Q Are there certain requirements that a student
 21 has to have to get into one of the magnets?
 22 A Yes.
 23 Q What are they for the math and science magnet?
 24 A For the math and science you have to take --
 25 it's sort of like the A through G requirement plan. You

1 have to take -- I know one of the major requirements is
 2 that you have to take three years -- at least three
 3 years of a foreign language. In regular school it's two
 4 years. But in the magnet program it's three years. It
 5 is absolutely impossible to avoid that. You have to
 6 take three years of Spanish.
 7 Q Any other requirements for the math and science
 8 magnet --
 9 A For the math and science magnet, not that I'm
 10 aware of yet because I just got into that magnet. But
 11 they always keep up constantly with your grades.
 12 Q How do they do that?
 13 A Sometimes they have like classroom setting
 14 meetings where they talk to you about different classes
 15 you should be taking and how to set your schedule for
 16 the following year. And they let you know that if you
 17 don't pass with a certain grade then you have to take --
 18 if you don't pass the class, if you get -- receive a
 19 fail in the class, then you have to take that class over
 20 and they make sure that you pass the class the next time
 21 around.
 22 Q Do you know about any of the requirements for
 23 the other magnets?
 24 A No. I know if you're in drama -- what is it,
 25 music magnet?

1 Q Yes.
 2 A Well, all of those students at least
 3 participate in some kind of drama or in band or music or
 4 play some kind of instrument.
 5 Q How do you know that?
 6 A Because I talked to one of the lead singers for
 7 the magnet program. And since I'm in leadership they
 8 also -- they tell me about it all the time. Every time
 9 if I need something done where I need people to sing at
 10 a certain event that I planned, then they will let me
 11 know that you need to go to someone that is in the
 12 drama -- if I know somebody that is in the drama magnet,
 13 they will tell me to go talk to them, or someone who
 14 plays a musical instrument or if I need to go talk to
 15 someone in the A team, then I need to go to the magnet
 16 that is in charge of the A team.
 17 Q Are there certain math and science requirements
 18 that you have to take for your magnet?
 19 A Math and science requirements, I know they --
 20 instead of you -- usually in the last two years of
 21 your -- the last -- in your 12th grade year, the last
 22 two -- you have about three or four electives. Usually
 23 a student will take only one elective and then decide to
 24 go home after lunch or after fifth period. And instead
 25 of doing it then, they encourage you to take a higher

1 level math such as trigonometry or physics, something
2 like that. Or they encourage you to take AP classes, AP
3 world history or U.S. history. They stress on taking AP
4 biology or AP calculus.

5 Q How did you find all of this out about the
6 magnet program?

7 A Because I originally was going to talk to my
8 counselor the day before I was supposed to start the
9 school and I also talked to other students in
10 leadership. And they asked me a couple questions about
11 what magnet I participated in at Crenshaw. And then
12 they told me, well, what was the differences between the
13 magnet at Crenshaw and the magnet at Washington. So
14 they told me the difference between those two. And they
15 just gave me some information on, you know, who to talk
16 to if I need certain things.

17 Q Anything else besides the drama program or the
18 magnet program that you like better at Washington?

19 A I like the leadership class.

20 Q You like that better than the leadership class
21 that you had at Crenshaw?

22 A Yes.

23 Q What do you like about it?

24 A It's a different -- it works totally different.

25 At Crenshaw you work with the administrators, but the

1 particular, but the setup that the teachers have that I
2 work with in the teacher training magnet program. So
3 it's not the program, it's the teachers that work in the
4 program. I like that because you get -- you are able to
5 give input for the lesson plan, which means like if a
6 teacher had an idea, you can let them know if it is a
7 good idea or if it is a bad idea. They ask you what
8 kind of projects that you would like to do.

9 Q This is what you had talked about before, the
10 learn community?

11 A Yes.

12 Q And they don't have that at Washington?

13 A No.

14 Q Anything else that you like better at Crenshaw
15 than you do at Washington?

16 A Not really. Not that I could think of right
17 now.

18 Q What about some of the problems with the
19 classrooms that you had at Crenshaw, do you have those
20 at Washington?

21 MS. LHAMON: That is vague as to "problems."

22 BY MS. VANSE:

23 Q How about like with the desks, like too many
24 students, not enough desks?

25 A Too many students, not enough desks? Right now

1 administrators, they are so demanding to the point where
2 they don't care. They just say do it and then you do
3 it. The administrators at Washington I work with -- at
4 Washington I work with they -- sometimes -- most of the
5 time they ask for your input. And what they will do is
6 they will tell you like, okay, if you want something
7 done, then they will give you suggestions as to how to
8 do the event or how to make it better.

9 And then a lot of times they even participate
10 in the events. Sometimes we will have like a dance on
11 the quad or something -- not like a dance, sometimes we
12 will have an event, sometimes we will play music, and
13 even the administrators will get up there and start
14 dancing.

15 Q Anything else that you like better about
16 Washington?

17 A The fact that the counselors actually came to
18 my class to actually talk to me about what I need to do
19 in order to stay in the magnet program and what class I
20 need to take.

21 Q Anything else?

22 A That's about it.

23 Q Is there anything else that you like better at
24 Crenshaw than you do at Washington?

25 A Not the teacher training magnet program in

1 the classes aren't overcrowded. I don't know if they
2 started off overcrowded or not. Because I didn't go
3 there before and I started -- what happened is that the
4 same classes that everyone had in the first semester
5 they basically kept those classes throughout the second
6 semester, when they started the second semester. So I
7 wouldn't know about the overcrowded situation other than
8 what is happening in my class right now. Right now the
9 overcrowded -- I can't think of any classes where the
10 classroom is overcrowded. No, there aren't any. I mean
11 there is a class where there's a large amount of
12 students, but --

13 Q What class is that?

14 A Spanish.

15 Q How many students are in your Spanish class
16 right now?

17 A I'd say about 35 to 40.

18 Q Have you heard any students at Washington
19 talking about classes that they have where there is not
20 enough students -- or desks for all those students to
21 sit in?

22 A No. I know there was some students complaining
23 before, before I went there, but other than when I
24 started going there, I haven't talked to them.

25 Q They were complaining about not enough desks?

- 1 A Yes.
- 2 Q When was that?
- 3 A That was back in -- back in 1999. Before I
- 4 started going there. That was during my 9th grade year
- 5 at Crenshaw because I knew a couple students that went
- 6 to Washington while I was going to Crenshaw.
- 7 Q Were these students that you met at the
- 8 Community Coalition?
- 9 A Two of them were. Other than that it was some
- 10 of my friends who I associated with.
- 11 Q Just friends like from your neighborhood?
- 12 A Yes.
- 13 Q What were their complaints about Washington?
- 14 A That they didn't like some of the
- 15 administrators, the way they act towards them.
- 16 Q How about specifically to the number of desks
- 17 in a classroom?
- 18 A The number of desks in a classroom, they were
- 19 saying -- all I was told was that their classrooms were
- 20 overcrowded.
- 21 Q Did they explain to you what they meant when
- 22 they said "overcrowded?"
- 23 A They said that there weren't enough seats and
- 24 that some students needed to check out of those classes.
- 25 Q What were their complaints about the

- 1 administration at Washington?
- 2 A They didn't like some of the rules because they
- 3 felt that they were stereotyped. The students were
- 4 automatically supposed to be a certain way and that's
- 5 why the rules were set forth the way they were.
- 6 Q Do you remember what rules they were talking
- 7 about?
- 8 A Not really. I can't remember. Because I know
- 9 one person in particular who talked about it, it was one
- 10 of my friends, and that was maybe about three years ago
- 11 before he moved.
- 12 Q How about any problems with the bathrooms that
- 13 you have at Washington?
- 14 A At Washington, again, they close off a lot of
- 15 the rest rooms. The only male rest room that is open is
- 16 the one in the science building, and so what the
- 17 leadership teacher does is sometimes like if we have
- 18 her -- well, we weren't in third period. Sometimes she
- 19 will open up the male's rest room located inside the
- 20 leadership -- they call it the leadership building, but
- 21 it's also the cafeteria. And the reason why they call
- 22 it the leadership building is because the only class
- 23 that is in that building is the leadership class. There
- 24 is no other class in there.
- 25 They have the cafeteria downstairs. They have

- 1 the place where the cooks make all -- prepare all the
- 2 food downstairs. And they also have their peer hall.
- 3 The peer hall and the cafeteria is one and the same
- 4 thing. You can use it for the students to eat in or you
- 5 can use it for any kind of presentation or assembly.
- 6 And usually they -- well, right now I know since I've
- 7 been there they haven't used it for any students to eat
- 8 in there. And then upstairs is where the teacher
- 9 cafeteria is located. And then across the hall from the
- 10 teacher cafeteria is where the leadership room is.
- 11 And the rest room that is located in the
- 12 science building, all -- when we first -- when I first
- 13 got there, all the windows were boarded up, and then
- 14 they were telling us that they were taking it off. I
- 15 don't know why the boards were up because they just
- 16 blocked off all the windows. I don't know why they were
- 17 up, but I know the second day I was there they took them
- 18 down.
- 19 The rest rooms, they have light in them, but
- 20 it's not enough light. They could light them up a
- 21 little bit better. There's graffiti on the wall again.
- 22 There's graffiti on the wall. Other than that, that's
- 23 it.
- 24 Q How many of the rest rooms have you used at
- 25 Washington?

- 1 A Two.
- 2 Q Did you see graffiti in both of those rest
- 3 rooms?
- 4 A Yes.
- 5 Q For the first rest room you used, was that the
- 6 rest room in the science building?
- 7 A Yes.
- 8 Q Were there any problems with the urinals or the
- 9 stalls in there?
- 10 A Nothing I readily saw because I didn't really
- 11 have time to analyze the rest rooms. I haven't been
- 12 there long enough to really know. I used the rest room
- 13 in the science building once and that was it -- well,
- 14 actually I used it twice. And then I used the one in
- 15 the -- what is that building called? It was the -- they
- 16 call it the language building because the way they have
- 17 it it's three buildings -- my older brother went to
- 18 Washington. So it was three buildings at first
- 19 originally in the front of the school.
- 20 What they did was they connected all those
- 21 buildings together. What they did is the first and the
- 22 second building, they was always connected, but the only
- 23 way to get -- originally they locked the stairs -- I
- 24 mean they locked the doors on the third and the -- let's
- 25 see. Not the third. They locked the door on the second

1 floor because there is no door on the floor, but you can
2 go straight across -- the buildings are connected on the
3 second and the first floor, the first two buildings.

4 So if you are standing in front of the school
5 on the main street the first street will be the -- on
6 the left side. And then that building is connected to
7 the middle building, which is in the middle, it's in the
8 center. And then the building in the center, it used to
9 be just those two buildings were connected, and then
10 there was a building on the right. But just recently
11 about a year ago they made bridges where they connected
12 those two buildings together.

13 Q One of those buildings is the language
14 building?

15 A Yes.

16 Q They have different names for it, but a lot of
17 students call it the language building because the
18 majority of classes that is in that building are Spanish
19 or French or English. And that's only like a very
20 few -- I think it's only maybe about one or two English
21 classes in there. Because they have another building
22 that is labeled the English building because they have a
23 separate building for English classes.

24 Q For the rest room that is in the language
25 building, did you notice graffiti in there also?

1 Q How about in the language building, was there a
2 soap dispenser there?

3 A The language building there was a soap
4 dispenser. There was no soap and no paper towels.

5 Q For your algebra class at Washington, do you
6 have a textbook?

7 A My algebra class at Washington, yes, I do.

8 Q Anything else that you use in class?

9 A Work sheets. And we have these small books
10 that are used whenever the teacher wants to work out of
11 them. Since I've been there I only worked out of them
12 maybe about three times.

13 Q Can you take your textbook home in your algebra
14 class?

15 A Yes.

16 Q Anything else that you use in class besides the
17 textbook, the work sheets, and the small books?

18 A That's it.



1 A Yes.

2 Q And that's all over? Can you describe what it
3 looks like?

4 A Yes, it was all over. Again, the room -- the
5 rest room could be lit up a little bit better. It is
6 still sort of -- it is not dark. Don't get me wrong, it
7 is not dark, but it is kind of like dim. They could put
8 more light in there. And the rest rooms are much larger
9 than the ones at Crenshaw.

10 Q Those two are --

11 A Yes.

12 Q -- the science and language building?

13 A Yes.

14 Q For the rest room in the science building, did
15 you notice any soap dispensers?

16 A Yes.

17 Q Do you know if there was soap in them?

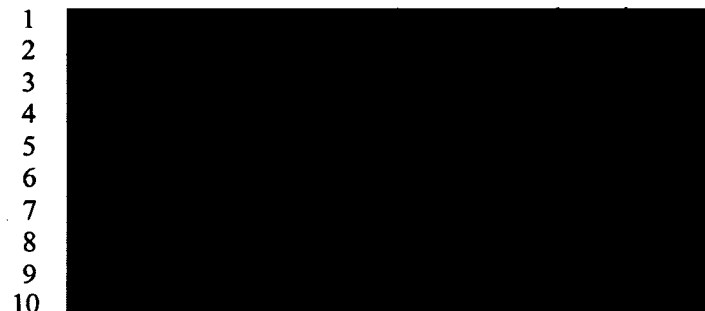
18 A Yes. The first time I used the one in the
19 science building, there was soap in them.

20 Q How about the second? Did you use it twice?

21 A The second time there wasn't. There wasn't any
22 paper towels in there either.

23 Q Were there paper towels in there the first
24 time?

25 A Yes.



11 Q Have you ever talked to her about problems you
12 are having in class?

13 A Yes.

14 Q How many times?

15 A Maybe three times.

16 Q Is this during class or after class?

17 A During class. No. Actually it was a few times
18 during class. It was like maybe one or two times during
19 class because a lot of times when we do our warmups,
20 what the warmups are is the set of problems that she
21 puts on the board and we have to do those in a set
22 amount of time. It is at the beginning of the class.
23 It is something that you do just to, you know, get us
24 working in the morning because that is our first period.

25 And a lot of times I will find myself doing a

1 problem wrong and she will mark it wrong and then she
2 will tell me because I didn't have a step here or I
3 didn't have a step there. I used to tell her that I
4 didn't know that I have to do it that way, but it will
5 still be considered wrong.

6 Q What would she say when you would tell her
7 that?

8 A She told me that I have to do it differently
9 the next time around.

10 Q Have you ever asked her to explain the new
11 method that she uses?

12 A In the beginning of the semester I did because
13 when I entered into the class for the first -- I think
14 about the first two weeks that I was there, there
15 were -- it was just me, my brother, and about three
16 other students that were in the class, and that was it,
17 and I asked her where were the rest of the students.
18 And she said the rest of the students were in some kind
19 of test or something because of some testing system that
20 they have and they were all in the -- in Peer Hall,
21 which was the cafeteria, doing some kind of test.

22 I asked her what kind of work are we going to
23 be doing. And she told me the work that we are going to
24 be doing. And she asked me if I know how to do it and I
25 say yes. She asked me if I knew how to do a couple more

1 Q Who was that?

2 A I had one of the tutors at the Community
3 Coalition help me.

4 Q How often did you see that tutor?

5 A Every Thursday at first, like the first two or
6 three weeks I was in school. And I didn't have the time
7 to go -- get any help from them anymore because after a
8 while I started working on my essays in my English
9 class. For the past month or so I had an essay probably
10 due like every three days.

11 Q When was the last time you think you saw a
12 tutor at the coalition for algebra?

13 A I think I saw one about two weeks ago on a
14 Thursday. And I saw one two weeks prior to that and it
15 was to get my essay revised.

16 Q Any other people you can think of who helped
17 you with your algebra class at Washington?

18 A The leadership teacher, Ms. Roundtree. She
19 will always ask me if I needed help. And if I needed
20 help with something, she will either help me with it or
21 she will get another student who has passed the class
22 help me.

23 Q How many times has she helped you with algebra?

24 A About twice.

25 Q How many times has she sent you to another

1 problems that I didn't mention when she was going over
2 it and I told her I haven't learned that yet. And she
3 said well, we learned that last semester. And I told
4 her when I was at Crenshaw we never learned anything
5 like that or got anywhere close to it.

6 So the thing that she showed me on the board is
7 the same thing that we are using currently in other math
8 problems and so that is another difficulty that I have.

9 Q Since that time -- that was at the beginning
10 when you first arrived at Washington?

11 A Yes.

12 Q Any other time when you asked her to explain or
13 help you with the math?

14 A There were times when we were doing projects,
15 such as a graphing project, I will ask her for help, and
16 she will help me in parts of the graph project and they
17 help a lot. I did receive a higher grade because I did
18 ask for help, because if I didn't ask for help I
19 probably would have gotten a lower grade.

20 Q Any other time you can think of that you asked
21 for help in your algebra class at Washington?

22 A That's it.

23 Q Have you ever had anyone else help you with
24 your algebra class at Washington?

25 A Yes.

1 student to help you?

2 A About two other times.

3 MS. LHAMON: Jennifer, I know that we have had
4 a long day, and I just want to say for the record that
5 this does not feel like a particularly productive use of
6 D'Andre's time since we are not putting at issue his
7 grade in the course or the lack of help for him at
8 school, but you can ask your questions if you want to.
9 But it does seem like if you are going to go down this
10 road much longer about his classes and ask other
11 questions, it is going to take significantly longer than
12 is necessary.

13 MS. VANSE: I feel that it is relevant. I am
14 not trying to prolong anything. I will get through
15 things as quickly as I can, but I do think it is
16 necessary to at least inquire into the classes and the
17 instruction that he is currently receiving.

18 Q Anyone else that you can think of that helps
19 you at Washington?

20 A That's it.

21 Q Are there any classes that you have at
22 Washington that you don't use a textbook in?

23 A Of course my leadership class, that doesn't
24 require a textbook. Textbooks as in like an English
25 book or --

1 Q Well, I guess, are there any classes that you
 2 don't use any books at all in at Washington?
 3 A I use a book in all my classes. You are
 4 referring to books that I don't have, right? Any
 5 classes that I don't have books in at all?
 6 Q Right. Any book at all.
 7 What do you consider a textbook to be?
 8 A A textbook is anything -- any kind of book that
 9 I can study from. Any book that I can read that relates
 10 to the topic of the class or anything like that.
 11 Q And you use a textbook in all of your classes
 12 at Washington except for the leadership?
 13 A Yes.
 14 Q Any classes at Washington that you are not
 15 allowed to take a textbook home?
 16 A I can take a textbook home for all my classes.
 17 Q Have you ever heard about any students at
 18 Washington who didn't use a textbook in their class?
 19 A No.
 20 Q Any students at Washington you've heard about
 21 who couldn't take a textbook home?
 22 A There was -- there were a few, but none of the
 23 people that I know.
 24 Q Who were the few that you've heard of?
 25 A People from -- who go to Ms. Roundtree and tell

1 relieved of liability for the original of
 2 the deposition;
 3 "That the witness will have 15 days
 4 from the date of the court reporter's
 5 transmittal letter to the ACLU to sign
 6 and correct the deposition.
 7 "And the ACLU will notify us of any
 8 changes up until that time?
 9 "MS. LHAMON: That's fine except that
 10 we will request that there will be 30
 11 days and we will do our best to get it
 12 back within 15 days. But because of the
 13 boys' work schedule and class schedule
 14 and their mother's work schedule we would
 15 like to have a 30-day time period.
 16 "MS. VANSE: I thought it was
 17 stipulated that it was going to be an
 18 expedited return time.
 19 "MS. LHAMON: We will do our best to
 20 meet the return time, but we would like
 21 to stipulate to 30 days.
 22 "MS. VANSE: I'm just not sure if I
 23 have that kind of authority. I am not
 24 sure of what is in place. I don't know
 25 if I can agree to that, but if you need

1 her that they need a book or if they wanted to know if
 2 she had a certain book that they can use to study from.
 3 Q How did you hear about that?
 4 A I was in the leadership class that day and I
 5 was in there during lunch and a student came in and
 6 talked to her during lunch.
 7 (Recess from 5:01 p.m. to 5:11 p.m.)
 8 MS. VANSE: We are going to have the same
 9 stipulations that we had last week and this deposition
 10 will be continued to next Sunday, June 3rd, at 9:30,
 11 unless counsel for O'Melveny or Lozano Smith indicates
 12 otherwise to Catherine.
 13 (The stipulation from the deposition
 14 of D'Andre DeVon Lampkin, Volume 1, is
 15 incorporated as follows:
 16 "MS. VANSE: May we stipulate copies
 17 of the documents attached to the
 18 deposition may be used as originals?
 19 "MS. LHAMON: Yes.
 20 "MS. VANSE: May we stipulate that
 21 the original of this deposition be signed
 22 under penalty of perjury and be delivered
 23 to the offices of the ACLU?
 24 "MS. LHAMON: Yes.
 25 "MS. VANSE: That the reporter is

1 more time, I'm sure we can work it out.
 2 "MS. LHAMON: Just so you know, your
 3 co-counsel in other depositions have
 4 stipulated to 30 days.
 5 "MS. VANSE: If that's true, then I
 6 have no problem with that.
 7 "MS. LHAMON: And we will do our best
 8 to get it done in 15.
 9 "MS. VANSE: That sounds fair."
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I, D'ANDRE DeVON LAMPKIN, do hereby declare under penalty of perjury that I have read the foregoing transcript of my deposition; that I have made such corrections as noted herein, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this _____ day of _____, 20____, at _____, _____ (City) (State)

D'ANDRE DeVON LAMPKIN
Volume 2

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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