

SUPERIOR COURT OF THE STATE OF CALIFORNIA

CITY AND COUNTY OF SAN FRANCISCO

ELIEZER WILLIAMS, et al.,)

Plaintiffs,)

vs.) No. 312 236

STATE OF CALIFORNIA, DELAINE) Pages 1 to 246

EASTIN, State Superintendent) Volume I

of Public Instruction, STATE)

DEPARTMENT OF EDUCATION,)

STATE BOARD OF EDUCATION,)

Defendants.)

AND RELATED CROSS-ACTION)

DEPOSITION OF LUCIA ORTIZ

TAKEN ON

SATURDAY, DECEMBER 29, 2001

Reported by: PHILIP D. NORRIS

CSR NO. 4980

<p style="text-align: right;">Page 2</p> <p>1 Deposition of Lucia Ortiz, taken on behalf of 2 Defendant State of California, at 400 South Hope Street, 3 Los Angeles, California, on Saturday, December 29, 2001, 4 at 9:35 a.m., before Philip D. Norris, CSR No. 4980, 5 pursuant to Notice. 6 7 APPEARANCES: 8 9 FOR THE PLAINTIFFS: 10 ACLU FOUNDATION OF SOUTHERN CALIFORNIA 11 (Not Present) 12 1616 Beverly Boulevard 13 Los Angeles, California 90026-5752 14 (213) 977-9500 15 16 FOR THE DEFENDANT STATE OF CALIFORNIA: 17 O'MELVENY & MYERS, LLP 18 BY: SABRINA HERON STRONG, ESQ. 19 400 South Hope Street 20 Los Angeles, California 90071-2899 21 (213) 430-6000 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX 2 3 WITNESS EXAMINATION PAGE 4 LUCIA ORTIZ (By Ms. Strong) 5 5 6 7 EXHIBITS PAGE 8 1-"Understanding Your SAT Program Score Report, 215 9 four pages 10 2-Stanford scores, two pages 216 11 3-"Your Grade Report," four pages 217 12 4-Report Cards, 2/00 and 2/01, one page 218 13 5-Report Cards, 8/17/99 and 8/18/00, one page 228 14 6-Report Cards, 12/01 and 6/01, one page 228 15 7-Report Card, 6/00, one page 233 16 8-Absent slips, two pages 235 17 90-Parent Report, one page 237 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES: (Continued) 2 3 FOR THE CROSS-DEFENDANT AND INTERVENOR LOS ANGELES 4 UNIFIED SCHOOL DISTRICT: 5 STRUMWASSER & WOOCHEER LLP 6 BY: JOHANNA R. SHARGEL, ESQ. 7 100 Wilshire Boulevard 8 Suite 1900 9 Santa Monica, California 90401 10 (310) 576-1233 11 12 FOR THE PLAINTIFFS: 13 MORRISON & FOERSTER, LLP 14 BY: JILL F. TEITELBAUM, ESQ. 15 555 West Fifth Street 16 Los Angeles, California 90013-1024 17 (213) 892-5478 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 LOS ANGELES, CALIFORNIA; SATURDAY, DECEMBER 29, 2001 2 9:35 A.M. 3 4 5 LUCIA ORTIZ, 6 having been first duly sworn, was 7 examined and testified as follows: 8 9 EXAMINATION 10 11 BY MS. STRONG: 12 Q. Good morning. My name is Sabrina Strong and I 13 represent the State of California in this lawsuit. 14 Would you please state and spell your name for 15 the record. 16 A. My name's Lucia Ortiz, L U C I A, O R T I Z. 17 Q. Do you have a middle name? 18 A. No middle name. 19 Q. Have you ever had your deposition taken before? 20 A. No. 21 Q. And do you know why you're here today? 22 A. Yes. 23 Q. Okay. Why? Why are you here? 24 A. I can't put it into words. 25 Q. Just try and do your best.</p>

1 A. Given my experiences as a LAUSD student and,
2 you know, tell you guys what the conditions are at our
3 school.

4 Q. Okay. All right. What I want to do first is
5 go over the procedures.

6 MS. TEITELBAUM: Speak up for the court
7 reporter.

8 BY MS. STRONG:

9 Q. I'm just going to go over what we're going to
10 do today and tell you how this is going to work. If you
11 have any questions at all, feel free to ask me.

12 The court reporter is here to take down
13 everything that's being said here today, so every
14 question I ask, every answer you give, any comments that
15 are made by the attorneys will all be taken down by the
16 court reporter.

17 A. Okay.

18 Q. You will have an opportunity to review the
19 transcript at the end of this deposition and you'll be
20 able to -- it will be after the deposition, sometime
21 after -- and you'll be able to make changes at that
22 time. If you make any changes to your answers, any
23 attorney in this lawsuit will be able to comment on the
24 changes that you've made. So it's really important that
25 you give your full and complete and accurate testimony

1 here today.

2 Do you understand that?

3 A. Yes.

4 Q. It's also important that you give verbal
5 answers to all of my questions today. If you nod your
6 head or shake your head, the court reporter can't take
7 that down on the transcript.

8 A. Uh-huh, okay.

9 Q. So uh-huh and uh-uh doesn't work either. We
10 need to say yes and no and make sure we verbalize all of
11 the answers. Another thing that is important to
12 remember is it's hard for him to take down two people
13 talking at once. I'm going to do my best to wait for
14 you to finish your answers before I proceed with my next
15 question, and I'd ask that you allow me to finish with
16 my question before giving one of your answers.

17 Do you understand that?

18 A. Yes.

19 MS. TEITELBAUM: Could we go off the record
20 before we continue?

21 MS. STRONG: Sure.

22 (Discussion held off the record.)

23 MS. STRONG: Let's go back on. Just for the
24 record, plaintiffs' counsel handed me a set of documents
25 that they are producing here for this deposition, which

1 we will address a little bit later.

2 Q. It's also important that you listen carefully
3 to the questions I ask. If you don't understand one of
4 my questions, please stop me and ask me to either
5 explain the question or rephrase the question, and I
6 will try and do that so that you do understand what it
7 is that I'm asking. If you don't explain to me that you
8 do not understand the question, I'm going to assume that
9 you do and your answer will be interpreted as if you
10 understood the question that was asked.

11 Do you understand that?

12 A. Yes.

13 Q. We don't want you to make any guesses here
14 today, but I am entitled to your best estimate where one
15 is asked for. Okay?

16 A. Okay.

17 Q. We're in a relatively informal setting here
18 today, but I want you to remember that you are
19 testifying under oath, and it's the same as if you were
20 testifying in a court of law, so you are subject to the
21 same penalties of perjury for false testimony.

22 Do you understand that?

23 A. Yes.

24 Q. If you need a break for any reason at any time,
25 just let me know and we'll try and wait till you give an

1 answer to any question that may be pending, and we'll
2 try and take a break immediately.

3 Do you understand that?

4 A. Yes.

5 Q. If at any point today during the deposition
6 something triggers your mind or you remember something
7 that was responsive to an earlier question I had asked,
8 please stop me and let me know. You can interrupt me at
9 any time and say you know what, I want to supplement my
10 answer regarding X subject. Because it's important that
11 we have your full and complete answers today.

12 Do you understand that?

13 A. Yes.

14 Q. Do you have any questions so far about anything
15 I've said?

16 A. No, I don't.

17 Q. Okay. Is there any reason why you may be
18 unable to give your best testimony here today?

19 A. I'm a little nervous, but I'll try my best to
20 give my most accurate recollection.

21 Q. Have you taken any medication or any substance
22 that would cloud your mind or affect your ability to
23 testify here today?

24 A. No.

25 Q. And do you suffer from any disability of any

1 kind that would affect your ability to testify here
 2 today?
 3 A. No.
 4 Q. Okay. Are you represented by an attorney here
 5 today?
 6 A. Yes.
 7 Q. And who is that?
 8 A. Jill.
 9 Q. And how did you meet her?
 10 A. I met her -- well, she called me and told me
 11 that I was going to be represented --
 12 Q. Okay.
 13 A. -- for this case.
 14 MS. TEITELBAUM: I'm going to instruct you not
 15 to discuss anything that you and I said to each other.
 16 Okay?
 17 THE WITNESS: Okay.
 18 BY MS. STRONG:
 19 Q. So she called you and you met her over the
 20 telephone. When did Jill first call you?
 21 A. I don't recall. I went on vacation and I don't
 22 remember the exact date.
 23 Q. Okay. Well, I don't want an exact date right
 24 now. Can you give me your best recollection, best
 25 estimate as to when it was that she called you?

1 A. Maybe three weeks ago.
 2 Q. And you said you went on vacation. What
 3 vacation are you referring to?
 4 A. San Francisco. Family.
 5 Q. And did you take time off school for this?
 6 A. No.
 7 Q. You were on school vacation?
 8 A. I was already on vacation.
 9 Q. When did your school go on vacation, on a
 10 break?
 11 A. I'm not very good with dates, so I can't say.
 12 Maybe about two weeks ago. So I might be wrong about
 13 the three weeks ago. She probably contacted me two
 14 weeks ago, right after I got on vacation.
 15 Q. So sometime in mid-December your school went on
 16 break; is that correct?
 17 A. Yes.
 18 Q. And shortly after that period, that moment in
 19 time, you received a call from Jill; is that correct?
 20 A. Yes.
 21 Q. And when does your school go back?
 22 A. I think -- well, our period ends January 4th,
 23 so I would assume January 6 or 7.
 24 Q. And when you say "our period ends January 4" --
 25 A. We have a three-week vacation.

1 Q. How did you first learn about this case?
 2 A. I was involved with another group and that's
 3 how I learned about this case.
 4 Q. What group?
 5 A. A group we formed at school, Locke student
 6 union.
 7 Q. What is Locke student union?
 8 A. It's just a group of concerned students meeting
 9 and discussing.
 10 Q. When did you first begin to participate in the
 11 Locke student union?
 12 A. I'd say around March.
 13 Q. Okay. Is that March of 2001?
 14 A. 2001.
 15 Q. How did you learn about Locke student union
 16 group?
 17 A. Through a teacher.
 18 Q. What teacher?
 19 A. Miss Motevalli.
 20 Q. Can you spell that for me?
 21 A. M O T E V A L L I.
 22 Q. And who is Miss Motevalli?
 23 A. She was my art teacher.
 24 Q. Your art teacher at the time in March 2001?
 25 A. Yes, uh-huh. Yes.

1 Q. That's good.
 2 Was the Locke student union group already
 3 formed at the time you began to participate?
 4 A. Yes.
 5 Q. Do you know when it formed?
 6 A. No, I don't. I was just involved.
 7 Q. Where was the first meeting that you attended
 8 for the Locke student group?
 9 A. In the classroom, my teacher's classroom.
 10 Q. Is the group supervised by teachers?
 11 A. Yes. We asked for them to be our advisors.
 12 Q. And how many advisors do you have for the Locke
 13 student union?
 14 A. Three.
 15 Q. Who are they?
 16 A. Miss Motevalli, Mr. Cubias.
 17 Q. Could you spell that?
 18 A. C -- that's right.
 19 Q. Go ahead.
 20 A. A S.
 21 Q. Spell the full name.
 22 A. C U B I A S.
 23 Q. C U B I A S?
 24 A. Uh-huh.
 25 Q. Okay. And the third teacher?

1 A. Is Miss Shah, S H A H.
 2 Q. Not S H A W?
 3 A. No.
 4 Q. All right. So how often does the Locke student
 5 union group meet?
 6 A. We used to meet twice a week.
 7 Q. And when would you meet?
 8 A. I'm not so sure about the dates, but to my best
 9 recollection, Tuesdays and Thursdays is when we met.
 10 Q. Okay. Was there a particular time of day that
 11 you would generally meet?
 12 A. Sometimes during lunch, sometimes after school,
 13 but there wasn't, like, a certain time when we would
 14 meet.
 15 Q. But usually it was every Tuesday and Thursday;
 16 is that correct?
 17 A. Not every, but we would try our best to keep it
 18 on those days.
 19 Q. How long did you attend meetings with the Locke
 20 student union group?
 21 A. For how many months?
 22 Q. Correct.
 23 A. For about four months.
 24 Q. So from approximately March through July; is
 25 that correct?

1 A. Uh-huh, March.
 2 Q. Through July?
 3 A. July.
 4 Q. Is there a reason why you stopped attending
 5 meetings in July 2001?
 6 A. We took a break during our vacation. We just
 7 took a break and decided to do our own thing.
 8 Q. And what vacation? This was summer vacation?
 9 A. It was summer's vacation.
 10 Q. And then did the group begin to meet again once
 11 school began in the fall?
 12 A. We tried, but we were -- most of us are
 13 seniors, so it was hard to get a good time to meet.
 14 Q. So did you ever attend any Locke student union
 15 group meetings after July of 2001?
 16 A. No, not formal meetings.
 17 Q. Were there any informal meetings?
 18 A. This was, like, a meeting between two people.
 19 It was just like a conversation, nothing formal. No
 20 more than two people, usually.
 21 Q. Okay. And do you remember any times when you
 22 met with one other individual regarding the Locke
 23 student union group?
 24 A. A board meeting that we attended.
 25 Q. Was there any other time that you can think of?

1 A. Radio interview.
 2 Q. Any others?
 3 A. No. That's about it. Make the radio newspaper
 4 interview.
 5 Q. Is that a third time?
 6 A. No. No. That was it. I was thinking of
 7 another thing.
 8 Q. Okay. That's okay.
 9 So there's the board meeting?
 10 A. Uh-huh.
 11 Q. And then there was a radio or newspaper -- it's
 12 not radio, it's just newspaper?
 13 A. Newspaper interview.
 14 Q. And so when you said that you met kind of
 15 informally with someone from the Locke student union
 16 group with respect to a board meeting, can you tell me
 17 about that?
 18 A. We just went up to the board, LAUSD board,
 19 downtown and we spoke up on issues that were going on in
 20 our school.
 21 Q. Who was with you?
 22 A. My friend Rosa Cuevas, member of the Locke High
 23 School student union.
 24 Q. What's Rosa's last name?
 25 A. Cuevas, C U E V A S.

1 Q. Was there any other member of the Locke student
 2 union group with you?
 3 A. No. There was outside volunteers that were
 4 helping us.
 5 Q. That were also with you at the LAUSD board
 6 meeting?
 7 A. Yeah. They provided our transportation.
 8 Q. Okay. And who would that be?
 9 A. Dori Miles, UTLA representative.
 10 Q. She's a UTLA representative?
 11 A. Yes.
 12 Q. Okay. Was there anyone else there?
 13 A. Miss Motevalli. And three other students. I
 14 think Crystle Carrillo, Starlett Brown. And I don't
 15 remember his last name, so I -- his name is Everado.
 16 Q. Everado?
 17 A. Uh-huh. They were all members of the Locke
 18 High School student union.
 19 Q. Oh, they were?
 20 A. Uh-huh.
 21 Q. So there were actually five members of the
 22 Locke student union?
 23 A. But it wasn't a meeting. We just spoke on what
 24 we wanted to talk about.
 25 Q. I understand that. I just want to get an idea

1 of who was there.
 2 So there were the five members of the Locke
 3 student union group?
 4 A. Uh-huh.
 5 Q. Miss Motevalli and Dori Miles?
 6 A. Yes.
 7 Q. And did you all go to the meeting together?
 8 A. Yes. They were our formal transportation. We
 9 don't drive.
 10 Q. Okay. And why did this group of you go to that
 11 LAUSD board meeting?
 12 A. We wanted to get our voices heard, and we
 13 wanted the board to know us.
 14 Q. Do you remember when this was that you went to
 15 this meeting?
 16 A. I think it was 10-24, 2001.
 17 Q. October 24th, 2001?
 18 A. Yes.
 19 Q. Is there some reason why you remember that date
 20 specifically?
 21 A. I was just reading something yesterday. Maybe
 22 not 10-24. October sounds too early. It's already
 23 school year, huh? I think we did it in the summer. I'm
 24 not so sure. So maybe -- don't write down the date. It
 25 was on the 24th, though.

1 Q. Well, he's taking it all down.
 2 A. On the 24th of 2001, but not 24th -- but not
 3 10. October sounds too onto the school year and it was
 4 not onto the school year.
 5 Q. So it was either August or September --
 6 A. August.
 7 Q. -- 24th? You think it was August 24th?
 8 A. August.
 9 Q. Was it before school had started?
 10 A. Yeah, it was before.
 11 Q. And it wasn't July 24th?
 12 A. I don't think so.
 13 Q. And you mentioned that there was something you
 14 were reading yesterday that reminded you of the date.
 15 What were you reading that reminded you of the date?
 16 A. I was reading the agenda.
 17 Q. What agenda?
 18 A. The school board meeting agenda, and I saw the
 19 date, so it kind of stuck in my head.
 20 Q. I know that happens sometimes. Just sticks
 21 with you.
 22 So that was the agenda for the meeting that you
 23 attended that date back in August?
 24 A. Yes.
 25 Q. Do you remember what was on the agenda?

1 A. I don't remember every single article. I mean,
 2 issue, but I could remember that we were very far off in
 3 the agenda.
 4 Q. You were far down on the agenda?
 5 A. Yeah, we were far down the agenda. We were
 6 pretty much one of the last issues.
 7 Q. Okay. So you had to wait a long time, huh?
 8 A. Yeah, we had to wait a long time.
 9 Q. Can you remember any of the items that were on
 10 the agenda?
 11 A. No, I can't. I just remember we were there,
 12 and we had to sit through the long meeting.
 13 Q. What was your issue entitled on the agenda? Do
 14 you remember that?
 15 A. No, I don't.
 16 Q. Can you give me the gist of what it was, your
 17 issue was described as?
 18 A. It was just, I guess, they put us down as
 19 speaking on behalf of Locke High School.
 20 Q. How did you learn about the LAUSD board
 21 meeting?
 22 A. You hear about these things. Newsletters that
 23 I've seen in the main office, other classmates from
 24 the -- I mean, not classmates, but members of the Locke
 25 High School union.

1 Q. You said newsletters. Are newsletters left in
 2 the office?
 3 A. Yeah. In the main office there they post up
 4 newsletters, and we saw that. They publish those
 5 newsletters, and we just thought that that's how we
 6 would talk with them. If our principal wasn't
 7 listening, we would talk to them.
 8 Q. And who is it that publishes the newsletters?
 9 Do you know?
 10 A. No, I don't. I just saw them on the board.
 11 Q. Where do you think that they're coming from?
 12 Do you have any sense as to that?
 13 A. I assume the board.
 14 Q. You assume the LA --
 15 A. LAUSD board.
 16 Q. Can you actually get a copy of the newsletters
 17 if you want to as a student?
 18 A. If they leave it lying around, yeah, you can
 19 get a copy. I think it might be able -- anyone might be
 20 able to access those.
 21 Q. But students can all go into the office and see
 22 where they're posted; is that correct?
 23 A. Yes.
 24 Q. And do you remember specifically seeing a
 25 newsletter that referenced this LAUSD board meeting back

1 in August?

2 A. No. This was -- it was prior, prior knowledge.

3 I knew about the meeting, and we called up and asked

4 when was the next meeting.

5 Q. I didn't follow that exactly. You said you

6 knew about the meeting and you called --

7 A. I knew that the meetings took place, and one of

8 our members called up and asked when was the next

9 meeting.

10 Q. Okay. Do you know who it was that called up to

11 ask about when LAUSD board was having their next

12 meeting?

13 A. Rosa Cuevas.

14 Q. And had you discussed with Rosa the idea that

15 she would call and find out about the next meeting?

16 A. Yes.

17 Q. When was that discussed with her?

18 A. It was before August, so I guess June, July.

19 We talked about going to the board.

20 Q. And was that discussed in one of your group

21 meetings with the Locke student union group?

22 A. Yes.

23 Q. And so, then, how is it that you coordinated

24 with Dori Miles and Ms. Motevalli to go to this LAUSD

25 board meeting in August?

1 A. We called them up and asked -- and asked them

2 if they could give us a ride there.

3 Q. Okay. You were on summer vacation at the time;

4 correct?

5 A. Yes.

6 Q. So did you call them at school? How did you

7 reach them?

8 A. Oh, we had their numbers.

9 Q. At home?

10 A. Well, we had Dori Miles' business card, and we

11 had Ms. Motevalli's number, and we saw them over the

12 summer.

13 Q. Where did you see them?

14 A. Coffee shops. Mostly we took her to coffee

15 shops. Well, she drove us.

16 Q. Sounds like a fun teacher.

17 A. Yeah, she is.

18 Q. Okay. Dori Miles, you said that you had her

19 card, and you mentioned earlier that she's a UTLA rep.

20 A. Yes.

21 Q. How did you have Dori Miles' card?

22 A. We met her at one of our meetings. She was

23 interested in our group.

24 Q. And is she also a teacher at your school?

25 A. No. She's just a UTLA representative that

1 learned about our group and took interest.

2 Q. Do you know how she learned about the group?

3 A. No, I don't.

4 Q. Did she attend any of your meetings?

5 A. Yes, she did.

6 Q. How many meetings do you recall her attending?

7 A. Like I said, I'm not very good with numbers.

8 Q. I know. Just try and do your best.

9 A. Three meetings.

10 Q. Approximately three?

11 A. Approximately.

12 Q. Do you remember when was the first meeting that

13 she attended?

14 A. No, I don't, not even approximate.

15 Q. It was sometime after you started going in

16 March of 2001?

17 A. Yes.

18 Q. So she attended approximately three meetings

19 between the period of March 2001 and July 2001?

20 A. Yes.

21 Q. At the board meeting in August, was someone

22 from your group able to speak to the board?

23 A. We all spoke on issues.

24 Q. Were you speaking about different issues?

25 A. Yeah, different issues.

1 Q. Do you remember what the issues were that each

2 of you spoke on?

3 A. I remember that I spoke about activities at our

4 school and how they would benefit and help us to stay

5 away from the streets. That was one. And I recall

6 another one of my friends speaking about books and, I

7 think, unqualified teachers, not credentialed.

8 Q. Do you remember any of the other issues?

9 A. No, I don't.

10 Q. Do you recall who you spoke to on the board?

11 A. It was the whole panel of the board members, so

12 we spoke to all the -- and the audience members that

13 were also there to speak upon whatever they had to speak

14 about.

15 Q. And do you know if anything happened as a

16 result of you speaking at the LAUSD board meeting?

17 MS. TEITELBAUM: Objection. That calls for

18 speculation. You can answer, if you know.

19 THE WITNESS: I don't.

20 BY MS. STRONG:

21 Q. Did you ever hear from anybody on the board

22 after the meeting?

23 A. We pursued them. We spoke to Mike Lansing's

24 representative.

25 Q. This is after the meeting?

1 A. Yes, it was after the meeting. We tried to set
 2 up a meeting with him.
 3 Q. And who tried to set up the meeting?
 4 A. I did.
 5 Q. And what did you do to try to set up the
 6 meeting?
 7 A. I wrote a letter and contacted his office.
 8 Q. And who is Mike Lansing?
 9 A. Our district representative. I don't know his
 10 exact title, but I know he represents our district.
 11 Q. Did you get a response to either your phone
 12 call or your letter to Mike Lansing?
 13 A. Yeah. Yeah, we set up a meeting. Not him, but
 14 his representative, I guess.
 15 Q. So a member of his staff?
 16 A. Yeah, a member of his staff.
 17 Q. And when did that happen?
 18 A. I don't recall either. Might have been late
 19 August, early September.
 20 Q. So shortly after the meeting?
 21 A. It was shortly after that meeting.
 22 Q. Within a month; would that be fair to say?
 23 A. No. I don't know if it was right after or it
 24 took a month. I'm not clear. I don't remember.
 25 Q. Well, what motivated you to set up the meeting

1 with Mike Lansing's -- a member of Mike Lansing's staff?
 2 A. We wanted to make sure that they were paying
 3 attention to us at the meeting and that they were going
 4 to do something about what we talked about.
 5 Q. So did you raise that with Mike Lansing's staff
 6 member when you met with him?
 7 A. We rephrased that. We just talked about the
 8 issues with him alone. We didn't tell him, oh, did you
 9 listen to us? that kind of thing.
 10 Q. And what did he say to you in response?
 11 A. He just heard what we had to say. He tried his
 12 best to respond.
 13 Q. And what were some of the responses he gave?
 14 A. I don't remember because I was running the
 15 meeting. I was in charge of the agenda and a group of
 16 other people spoke on that.
 17 Q. So you had a written agenda for the meeting
 18 with Mike Lansing's staff member?
 19 A. Yes.
 20 Q. Do you still have a copy of that agenda?
 21 A. I might.
 22 Q. Was it on computer?
 23 A. No. I printed it out, so I -- I have problems
 24 with my computer.
 25 Q. But you might have a copy of that somewhere?

1 You're not sure?
 2 A. I might, but I don't know for sure.
 3 Q. Do you remember any of the items that were on
 4 the agenda?
 5 A. We went a little bit off the agenda. We just
 6 spoke about the problems that were going on.
 7 Q. Do you remember the issues that you identified
 8 during that meeting with him?
 9 A. I remember the book situation. We spoke about
 10 books.
 11 Q. Okay. Anything else that you remember
 12 discussing?
 13 A. No, I don't. Maybe standardized tests, but,
 14 like I said, I don't remember that much. I recall
 15 books, talking about books.
 16 Q. And now I'm going to come back again to: Do
 17 you recall any of his responses? You said --
 18 A. No, I didn't.
 19 Q. -- you weren't really focusing on --
 20 A. He didn't really respond to things because he
 21 was just a representative. He was just there to hear
 22 our concerns.
 23 Q. Okay. So after that meeting with Mike
 24 Lansing --
 25 A. It wasn't Mike Lansing.

1 Q. I'm sorry. Thank you for that clarification.
 2 After that meeting with Mike Lansing's staff
 3 member, did you hear anything else from that office?
 4 A. I didn't hear anything, but he spoke to someone
 5 else from -- from that meeting.
 6 Q. Let's back up. Who else was at that meeting?
 7 A. Another high school graduate, Locke High School
 8 graduate.
 9 Q. Do you remember his or her name?
 10 A. I know her last name is Perkins-Ali. I don't
 11 remember her first name. Natalie, I think.
 12 Q. Anyone else?
 13 A. Mr. Cubias again.
 14 Q. Anyone else?
 15 A. Myself, Rosa Cuevas, and the representative --
 16 Mike Lansing's representative was Louis Martisage
 17 (phonetic).
 18 Q. Do you know how to spell that?
 19 A. No, I don't.
 20 Q. Say it slowly.
 21 A. Louis Martisage.
 22 Q. Anyone else you can think of at that meeting?
 23 A. Mr. Cubias' daughter, but I don't know her
 24 name.
 25 Q. How old is she?

1 A. I don't know.
 2 Q. Young?
 3 A. Yeah, she's young.
 4 Q. I probably should say: Younger than you?
 5 A. Yeah, younger than me.
 6 Q. There's all kinds of variations. That's a very
 7 relative term.
 8 Okay. So now you said someone else that was at
 9 the meeting received a response from Mike Lansing's
 10 office after the meeting; who was that?
 11 A. Mr. Cubias.
 12 Q. And what did Mr. Cubias receive or hear from
 13 that office?
 14 A. I think they set up another meeting. I wasn't
 15 part of that meeting.
 16 Q. Do you know if he received a letter?
 17 A. No, I don't.
 18 Q. Okay. How do you know that Mr. Cubias had a
 19 response from someone in Mr. Lansing's office?
 20 A. He told me.
 21 Q. And what did he tell you?
 22 A. Oh, he just told me he had a meeting with Mike
 23 Lansing and another student. I don't recall who it was,
 24 whether it was a he or she, but he told me there was
 25 another meeting.

1 Q. Did you hear anything more about any response
 2 from Mr. Lansing's office?
 3 A. No.
 4 Q. Do you know if anything was done, that you know
 5 of, in response to your meeting or Mr. Cubias'
 6 subsequent meeting with Mr. Lansing or his staff?
 7 A. No, I don't.
 8 Q. Just to verify, initially we were talking about
 9 the LAUSD board meeting that you spoke at with some
 10 other members of the student union group.
 11 A. Yes.
 12 Q. Did you ever hear anything more from the LAUSD
 13 board with respect to your having spoken there?
 14 A. No, I never did.
 15 Q. And do you know what was done with any of the
 16 comments that you and your classmates, co-members, made
 17 at that meeting?
 18 A. Can you repeat that question?
 19 Q. Yes. Do you know if anything more was done or
 20 if anything was done by anyone at the LAUSD board in
 21 response to the comments that you and your classmates
 22 made at that meeting?
 23 MS. TEITELBAUM: Objection. That calls for
 24 speculation.
 25 ///

1 BY MS. STRONG:
 2 Q. Go ahead.
 3 A. Not to my knowledge.
 4 Q. Okay. And did you understand that they would
 5 take any action, the board would take any action with
 6 respect to any of the comments that you made?
 7 A. They said they would, but I never saw anything.
 8 Q. Okay. When you say they said they would, what
 9 do you mean by that?
 10 A. Genethia Hayes and another board member, I
 11 think it was Mike Lansing, said that they would try to
 12 set up a meeting or do something with us and meet to
 13 discuss the issues, but it was supposed to be a forum.
 14 Those aren't any exact -- those aren't their exact
 15 words, but something along the lines of having a forum,
 16 and that's how we set up that meeting -- and that's why
 17 I set up that meeting with the representative.
 18 Q. Okay. And you were able to do that? You
 19 didn't have any problems setting up that meeting?
 20 A. Yes.
 21 Q. Is that correct?
 22 A. Yes, no problems.
 23 Q. Okay. Great. Let's be careful with double
 24 negatives.
 25 Did you ever make any attempts to speak with

1 Genethia Hayes after the meeting?
 2 A. No.
 3 Q. So with respect to the Locke student union
 4 group -- well, actually one other point first.
 5 You also mentioned that after July 2001 the
 6 other informal meeting that you had with members of the
 7 Locke student union group was with respect to some
 8 newspaper interview.
 9 A. Yes.
 10 Q. Can you tell me about that?
 11 A. Two of my -- well, no, it wasn't two. He
 12 wasn't involved. Rosa Cuevas and I were interviewed by
 13 the L.A. Youth.
 14 Q. By who?
 15 A. L.A. Youth newspaper.
 16 Q. You said "he wasn't involved." Who was the
 17 other person?
 18 A. Oh, that was her brother.
 19 Q. He was with you?
 20 A. He was with us.
 21 Q. Is he older or younger than you?
 22 A. Younger than her sister. I mean his --
 23 whatever.
 24 Q. Younger than Rosa?
 25 A. Yeah, younger than Rosa.

1 Q. Okay. Now, how did this interview come about?

2 A. They contacted us. They learned about us.
3 Again, we had a lot of attention, and they learned about
4 us and were interested in talking to us.

5 Q. Okay. And when you say "we had a lot of
6 attention," are you referring to the Locke student union
7 group?

8 A. Yes.

9 Q. And what do you mean by "we had a lot of
10 attention"?

11 A. Well, we were a very outspoken group of
12 students, and everyone was noticing us, media, teachers,
13 administration, parents.

14 Q. And how was it that they were taking note of
15 you?

16 A. Well, we were trying to talk to the principal,
17 and we were the only group that actually spoke up about
18 the issues, problems going on at our school.

19 Q. But what did you do to get people to notice you
20 outside your school?

21 A. Fliers. Our parents. We talked to parents and
22 got attention from them.

23 Q. Okay. You said fliers. Your group would
24 create fliers?

25 A. Yes, for meetings.

1 Q. So would there be a flier for every meeting?

2 A. Not every meeting, but there would be some
3 fliers.

4 Q. For most of the meetings?

5 A. No, not most of our meetings. Just like
6 special, big meetings. We wanted our group to get
7 bigger, more support, and so we created -- we started
8 creating fliers.

9 Q. And what would you put on the fliers?

10 A. Where our meetings were and when they were and
11 what we would talk about.

12 Q. What you would talk about, the issues, would
13 that vary on each flier?

14 A. No. We would just put, like, an opportunity to
15 talk about problems at school, stuff like that. We
16 never put, like, a specific agenda.

17 Q. Where would you put the fliers?

18 A. We would pass them out by hand, you know, to
19 our classmates. Sometimes we'd post them up.

20 Q. Where would you post them?

21 A. Around the school. But they would get taken
22 down. We gave them to parents, parent volunteers at our
23 school.

24 Q. Anyone else?

25 A. I think one of my classmates tried to make an

1 attempt to put them in teacher's boxes.

2 Q. Was that successful?

3 A. Some teachers got them, some teachers threw
4 them away.

5 Q. Anything else you can think of?

6 A. No.

7 Q. Okay. So I'm trying to understand. How is it
8 that someone outside of the school learned about this?

9 A. Well, we would pass out our fliers to our
10 friends, and I assume they would give them to their
11 parents and their parents would contact people that they
12 knew.

13 Q. You also said that you received media
14 attention; correct?

15 A. Yes.

16 Q. Do you know how you received media attention?

17 A. I assume maybe a parent.

18 Q. You don't know really?

19 A. No, I don't know exactly.

20 Q. And how is it that -- why is it -- let me
21 rephrase that.

22 How is it that you know you received media
23 attention? Did members of the media come to the school,
24 to the meetings?

25 A. Yes. We were interviewed from media sources.

1 Q. And is this going to be interviews other than
2 the L.A. Youth newspaper?

3 A. Yes.

4 Q. Where else? What other news media services
5 interviewed you?

6 A. L.A. Times.

7 Q. Any others?

8 A. A talk radio show.

9 Q. Do you know what the show was?

10 A. I don't know the station, but I know that the
11 announcer or whatever was Michael Jackson.

12 Q. Not the Michael Jackson?

13 A. It's a catchy name. That's all I remember. I
14 don't remember the station number.

15 Q. Any other news media sources?

16 A. Not that I -- not for me, but my other
17 classmates.

18 Q. Were interviewed by other media sources?

19 A. Not classmates, but classmates slash members of
20 the Locke student union.

21 Q. Okay. Do you remember some of the -- can you
22 name for me what media services interviewed some of your
23 other members of the student union group?

24 A. No, I can't say. Rosa Cuevas, L.A. Youth.
25 That's all I can tell you for sure.

1 Q. I'm sorry?
 2 A. Rosa Cuevas was also there with the L.A. Youth,
 3 was interviewed by the L.A. Youth.
 4 Q. No. No. I meant did you know any of the other
 5 news companies or organizations?
 6 A. No, I don't.
 7 Q. With respect to the L.A. Youth newspaper that
 8 interviewed you, you said that that was after July 2001;
 9 correct? Because this was one of the informal meetings
 10 that took place after you stopped going to the meetings
 11 with the group.
 12 A. Yeah, it wasn't long after.
 13 Q. It wasn't?
 14 A. It was after the August meeting or before. I
 15 don't remember. I lost my train of thought.
 16 Q. That's okay. You stopped going to the student
 17 youth group meetings in July because you went on summer
 18 vacation.
 19 A. We got contacted individually, not as a group.
 20 Q. At your homes?
 21 A. Yes.
 22 Q. That happened in July, and then in late August
 23 you think you met with the LAUSD board.
 24 A. Yes.
 25 Q. Do you remember if this L.A. Youth newspaper

1 was before you went to the board or after you went to
 2 the board?
 3 A. No, I'm not so clear.
 4 Q. Do you remember, maybe if you think back, did
 5 you tell the news reporter that you had already gone to
 6 the board for the meeting?
 7 A. Yeah, it was after.
 8 Q. So it was after the LAUSD board meeting in
 9 August?
 10 A. Yeah. Because I think they asked us what we
 11 talked about.
 12 Q. Do you remember if it was -- you were already
 13 back in school by the time you were speaking with this
 14 reporter?
 15 A. It was before.
 16 Q. Okay. So sometime after the LAUSD board
 17 meeting in August but before you began the school year
 18 in the fall of 2001; is that correct?
 19 A. Yes.
 20 Q. Okay. Do you recall who it was that contacted
 21 you from the L.A. Youth newspaper?
 22 A. It was a student, Bianca Gallegos.
 23 Q. And you said a student. A student from where?
 24 A. She's a student reporter. I don't know what
 25 high school she's from.

1 Q. Where did the interview take place?
 2 A. By the Watts Towers.
 3 Q. Who was present? Do you remember the actual
 4 location where you had the interview?
 5 A. Watts Towers. It was by that statue, that
 6 thing that they built.
 7 Q. Who was present at the interview?
 8 A. Myself, Rosa, her brother.
 9 Q. Rosa's brother?
 10 A. Rosa's brother.
 11 Q. Okay.
 12 A. Libby. An older person.
 13 Q. Libby?
 14 A. Libby. I don't remember her last name. And
 15 Bianca.
 16 Q. The reporter?
 17 A. The reporter. And Ms. Motevalli.
 18 Q. Who is Libby? I know you don't remember her
 19 last name, but how do you know Libby?
 20 A. She was the one who took Bianca to the
 21 interview. She's like an older reporter. She might be
 22 an advisor.
 23 Q. Of the L.A. Youth newspaper?
 24 A. Yeah. I don't remember her exact title.
 25 Q. Anyone else present at that interview?

1 A. That's all who I can think of.
 2 Q. Okay. And did any story come of the interview?
 3 A. They haven't published it yet. They were
 4 supposed to, but they haven't.
 5 Q. Okay. Do you have an understanding as to when
 6 they're to publish this story?
 7 A. January issue, I think.
 8 Q. January 2002?
 9 A. Uh-huh, yes.
 10 Q. And do you know the headline for the story?
 11 A. No, I don't.
 12 Q. Do you know the topic that is going to be
 13 covered in the story?
 14 A. No. I just know that it was an interview.
 15 That's what I heard, that it was just our interview.
 16 Q. And so do you understand that the story is
 17 going to be limited to your interview, or do you
 18 understand that the story will include information
 19 beyond what the reporter received from you during your
 20 interview?
 21 MS. TEITELBAUM: Objection. That calls for
 22 speculation.
 23 THE WITNESS: I'm not sure.
 24 BY MS. STRONG:
 25 Q. She didn't tell you one way or the other?

1 A. No.
 2 Q. Do you know if you'll have an opportunity to
 3 read anything regarding that interview before it's
 4 actually printed?
 5 A. No.
 6 Q. All right. You also mentioned that the L.A.
 7 Times either contacted your group or somehow was aware
 8 of the Locke student union group; can you tell me about
 9 that?
 10 A. I wasn't interviewed, but I know that they've
 11 done articles on our group, on issues that we addressed.
 12 But I don't know specifics.
 13 Q. Okay. Did anyone from the L.A. Times ever come
 14 to one of your meetings, that you know of?
 15 A. Not one of our formal meetings. Came to our
 16 school, but not a meeting.
 17 Q. When was it that someone from the L.A. Times
 18 came to your school?
 19 A. I can't tell you an exact. I can't tell you
 20 the date.
 21 Q. I know. I understand that.
 22 A. Approximately?
 23 Q. Your best effort as to when it happened. I can
 24 work with you on this.
 25 Was it between the time that you were

1 attending --
 2 A. I was attending school when he contacted.
 3 Well, when he went to our school.
 4 Q. Was it the time when you were going to the
 5 student union meetings?
 6 A. Yes, uh-huh.
 7 Q. So sometime between March 2001 and July 2001
 8 someone from the L.A. Times came to your school?
 9 A. No. Somewhere between March and June, when I
 10 was still at school.
 11 Q. How did you know that someone from the L.A.
 12 Times came to your school?
 13 A. He gave me his business card.
 14 Q. Do you remember the guy's name?
 15 A. Duke Helfend.
 16 Q. And he was a reporter?
 17 A. Yes.
 18 Q. When was it that you interacted with him?
 19 A. When he gave me his business card.
 20 Q. Where were you?
 21 A. I don't know.
 22 Q. Was it during nutrition or lunch or were you in
 23 class?
 24 A. It was a break.
 25 Q. So between classes?

1 A. So maybe nutrition. No. Maybe nutrition or
 2 lunch.
 3 Q. What was he doing? How is it that he came into
 4 contact with you?
 5 A. He was interviewing our group. Not all of us,
 6 but he was interviewing, like, a couple.
 7 Q. Were you in a classroom then?
 8 A. No. We were outside. Nutrition and lunch we
 9 were along the quad or walking around.
 10 Q. Nutrition and lunch do you stay with that
 11 group, individuals from the student union group?
 12 A. We were friends before we formed that union, so
 13 we always hang out at the same place.
 14 Q. So how did Duke Helfend find your group?
 15 A. He knew what we looked like.
 16 Q. How did he know that?
 17 A. I think he attended a prior meeting. I'm not
 18 quite so sure, but he already knew what we looked like.
 19 Q. Some of you? Not you?
 20 A. No.
 21 Q. But some of your friends that were in the group
 22 he already had met at a prior time?
 23 A. Yeah. Because we had contacted him.
 24 Q. And do you know if any story was printed in
 25 response or following Duke Helfend's interview of you

1 and your friends that day?
 2 A. I don't know if it ever made it out to the
 3 printing edition.
 4 Q. Do you know if there was a story that was
 5 written?
 6 A. No, not that I ever read it.
 7 Q. Do you know of any other time when someone from
 8 the L.A. Times came to your school?
 9 A. Just recently before we went on a break,
 10 Thursday before we went on a break.
 11 Q. Thursday before you went on Christmas break for
 12 the -- I shouldn't say Christmas, the winter break for
 13 2001?
 14 A. Yes.
 15 Q. Do you know who it was from the L.A. Times that
 16 came to your school?
 17 A. The same guy.
 18 Q. Duke Helfend came again?
 19 A. Uh-huh.
 20 Q. Do you know why Duke Helfend returned to your
 21 school?
 22 A. Probably a follow-up story.
 23 Q. Okay. Who did he speak with or meet with?
 24 A. He met with our student council class.
 25 Q. Are you on the student council?

1 A. Yes. Along with other visitors.
 2 Q. Who were the other visitors?
 3 A. Rosa was there.
 4 Q. And she's not already on student council?
 5 A. No, she's not.
 6 Q. Anyone else that's not on student council that
 7 was at the meeting?
 8 A. Ms. Shah.
 9 Q. Michele who?
 10 A. Ms. Shah. That's the teacher.
 11 MS. TEITELBAUM: Ms. Shah.
 12 MS. STRONG: Ms. Shah. I'm sorry. I thought
 13 you said Michele.
 14 Q. Okay. Anyone else?
 15 A. Random people, student council members.
 16 Q. No, other than student council members.
 17 A. No, that's all I remember.
 18 Q. Do you know if Mr. Helfend has already written
 19 a story or intends to write a story based on the visit
 20 the Thursday before the winter break?
 21 A. I assume he's writing a story since he came to
 22 our school and started taking notes.
 23 Q. Do you have any idea when that's to be
 24 published or if that's already been published?
 25 A. No.

1 Q. Do you know of any other time when anyone from
 2 the L.A. Times came to your school?
 3 A. No.
 4 Q. You also mentioned someone interviewed you from
 5 a talk radio show.
 6 A. Yes.
 7 Q. And the individual's name was Michael Jackson?
 8 A. Yes.
 9 Q. Where did that interview take place?
 10 A. Radio station.
 11 Q. At the radio station?
 12 A. Yes.
 13 Q. Do you know where it's located?
 14 A. No.
 15 Q. Any general idea where it's located?
 16 A. By Universal Studios.
 17 Q. How did you get there?
 18 A. Ms. Motevalli drove me, I think. I'm not sure
 19 if it was her.
 20 Q. Who was present?
 21 A. Yeah, it was her because she was in the
 22 interview.
 23 Q. Okay. Do you know anyone else who was with
 24 you?
 25 A. No. It was just me and her.

1 Q. Rosa wasn't there?
 2 A. She might have been there, but I don't
 3 remember. I'm not clear.
 4 Q. Can you help me with when this took place?
 5 A. No.
 6 Q. Let's try and figure this out. Was it after
 7 you started school again in the fall?
 8 A. It was still during my summer vacation.
 9 Q. Okay. So sometime between June 2001 and
 10 September of 2001?
 11 A. Yes.
 12 Q. Do you know if it was before or after the
 13 meeting at the LAUSD board?
 14 A. No, I don't.
 15 Q. You don't recall?
 16 A. Sorry.
 17 Q. You don't know if he asked you about the
 18 meeting?
 19 A. No, I don't.
 20 Q. Okay. How was that meeting arranged? Do you
 21 know?
 22 A. No. I assume that they contacted
 23 Ms. Motevalli, and then she asked me if I was willing to
 24 speak.
 25 Q. Okay. Was the interview made over the air?

1 A. Yes.
 2 Q. Was that a live interview over the air?
 3 A. Yes.
 4 Q. How long was the interview?
 5 A. Maybe a 30-minute show. 20-, 30-minute slot.
 6 Q. And do you remember what day of the week it
 7 was, by any chance?
 8 A. No.
 9 Q. Was it a weekend?
 10 A. No.
 11 Q. It was a Monday through Friday?
 12 A. I don't pay attention during my breaks, the
 13 days.
 14 Q. Do you know if it's a morning talk show?
 15 A. It was night.
 16 Q. An evening talk show?
 17 A. Evening.
 18 Q. Do you know what time it goes on the air?
 19 A. Eight or nine.
 20 Q. P.m.?
 21 A. Uh-huh, yes.
 22 Q. Is it a talk show that's still on the air now?
 23 A. Yes.
 24 Q. Do you know if it's AM or FM?
 25 A. No.

1 Q. You don't know the number?
 2 A. No, I don't. I don't remember that.
 3 Q. Did you ever get a copy of the tape of that
 4 interview?
 5 A. I didn't ask for it. I don't like to hear my
 6 voice on the radio.
 7 Q. I'm sure your mother would, though.
 8 Do you know if any of your friends or family
 9 members have a copy or have a tape of that interview?
 10 A. No. I mean, heard it? No.
 11 Q. Or if they have a tape of it.
 12 A. No, I don't.
 13 Q. And what issues were discussed with Michael
 14 Jackson?
 15 A. It was some issues with the school and other
 16 issues that I don't -- I'm not allowed to talk about.
 17 Q. Well, what other issues do you think you're not
 18 allowed to talk about?
 19 A. They don't have to do with the deposition, with
 20 the suit.
 21 Q. Okay. Can you identify those issues for me?
 22 We can determine whether or not they have to deal with
 23 the deposition or not. Go ahead.
 24 A. Can I talk to her first?
 25 Q. Sure.

1 MS. TEITELBAUM: I think I know where this is
 2 going.
 3 We can go off the record for a minute.
 4 (Discussion held off the record between counsel
 5 and the witness outside the deposition room.)
 6 MS. STRONG: We're back on the record.
 7 Q. Now that you've had an opportunity to talk with
 8 your counsel, can you respond to the question that I
 9 asked before we took a break?
 10 A. Yes. We talked about the illegal searches and
 11 seizures going on in our school.
 12 Q. That's what you understand to be illegal
 13 searches and seizures; correct?
 14 A. Yes.
 15 Q. But with respect to what you identified as
 16 matters relating to this lawsuit, what issues did you
 17 discuss with Mr. Jackson?
 18 A. With this lawsuit; right?
 19 Q. Correct.
 20 A. Pretty much about what I talked about at the
 21 board meeting that had to do with how, if we had enough
 22 adequate activities and if our school atmosphere was
 23 different from the one that we had, that those things
 24 wouldn't be going on, that we wouldn't be treated as
 25 criminals at school.

1 Q. Anything else that you discussed with him?
 2 A. No. I think mostly geared towards the illegal
 3 searches and seizures, but we did talk about something
 4 pertaining to this suit.
 5 Q. Let me back up. I don't think I ever covered
 6 with you the items that you discussed with the L.A.
 7 Times reporter. What were the issues that you discussed
 8 with him?
 9 A. I didn't discuss any with him personally.
 10 Q. Okay. But what issues were raised to him that
 11 you knew about because you were present?
 12 A. Well, I don't know what he talked about with
 13 the first interview, his first visit with us, but I do
 14 remember the one where he visited us the Thursday before
 15 the break. He talked to my class about the conditions,
 16 like bathrooms, books, teachers, that kind of stuff.
 17 Q. Any other issues that you can remember him
 18 talking about?
 19 A. The movement that's going on in our school.
 20 Q. The movement?
 21 A. Yes. Our principal was dismissed from our
 22 district and that's what we talked about. And he talked
 23 about Miss Russo.
 24 Q. Okay. What's the name of the principal that's
 25 been removed from your district?

1 A. [REDACTED]
 2 Q. And who is Ms. Russo?
 3 A. Sylvia Russo is the superintendent of District
 4 I.
 5 Q. Anything else that he talked about?
 6 A. That's all I can think of. Clogged my
 7 thinking.
 8 Q. When did [REDACTED] get removed from the
 9 district, to your knowledge?
 10 A. Well, her last day was November 2nd.
 11 Q. 2001?
 12 A. Yes.
 13 Q. Do you know why she was removed from the
 14 district?
 15 MS. TEITELBAUM: Objection. Calls for
 16 speculation.
 17 THE WITNESS: School audit team visit, and I
 18 guess she wasn't performing.
 19 BY MS. STRONG:
 20 Q. You said a school audit team visit. Do you
 21 know what group that was?
 22 A. No. I'm not sure if it was a school audit
 23 team, but it might have just been the District I people.
 24 Q. The district who people?
 25 A. I. That's the name of our district.

1 Q. I'm sorry.
 2 MS. TEITELBAUM: See, again, I'm going to just
 3 warn you about not guessing. If you know the answers to
 4 her questions, then you can answer them.
 5 BY MS. STRONG:
 6 Q. Why is it that you think it might be someone
 7 from District I?
 8 A. They have badges.
 9 Q. Okay. And was someone on your campus at some
 10 point with those badges?
 11 A. They're still on our campus.
 12 Q. What do you mean by that?
 13 A. Since we don't have a principal, they're there
 14 to pretty much take care of us.
 15 Q. And who is it that's there?
 16 A. I don't know their names.
 17 Q. How many people are there?
 18 A. I can't give you a good estimate.
 19 Q. More than five?
 20 A. More than five.
 21 Q. More than 10?
 22 A. Maybe not more than 10.
 23 Q. Between approximately five and 10 people have
 24 come onto your campus and are there since the time that
 25 [REDACTED] was removed from the school; is that correct?

1 A. Yes.
 2 Q. And it's your understanding that those are
 3 individuals that are from District I because they wear
 4 badges that identify them as such; is that correct?
 5 A. I'm assuming that.
 6 Q. Based on what?
 7 A. Well, they have the school board logo, so I
 8 assume that they're from the school district. Because
 9 if they were from the state, they would have another
 10 logo.
 11 Q. Okay. So the logo, is it the LAUSD school
 12 board logo or something specific to District I?
 13 A. No, the LAUSD.
 14 Q. Is there anything that identifies them
 15 specifically with District I?
 16 A. No.
 17 Q. How is it that you have an understanding that
 18 [REDACTED] was not performing her duties?
 19 A. Well, she's not there anymore.
 20 Q. Let me rephrase that question.
 21 How is it that you understand she was removed
 22 from the school because she was not performing her
 23 duties?
 24 A. I don't know. I've heard, but I don't know for
 25 a fact.

1 Q. Okay. Who have you heard that from?
 2 A. Teachers.
 3 Q. Okay. What teachers have told you that?
 4 A. My leadership advisor.
 5 Q. And who is that?
 6 A. Mr. Porter.
 7 Q. Mr. Porter?
 8 A. Yes.
 9 Q. Anyone else who's told you that?
 10 A. Classmates, but it's just rumors going on.
 11 Q. Do you know why Mr. Porter has any
 12 understanding as to why [REDACTED] was removed from the
 13 school?
 14 MS. TEITELBAUM: Calls for speculation.
 15 THE WITNESS: He's a teacher, so he knows more
 16 than I do.
 17 BY MS. STRONG:
 18 Q. And you said that the L.A. Times reporter in
 19 December talked about Miss Russo also, who's the
 20 superintendent of District I. What did he say about
 21 Miss Russo?
 22 A. He just asked us if -- what she was doing and
 23 if she was interacting with us. That's all.
 24 Q. And do you know if she is interacting with
 25 anyone at your school?

1 A. Yes.
 2 Q. Who?
 3 A. The students.
 4 Q. And how does she interact with the students at
 5 your school?
 6 A. When she's around campus, she walks around.
 7 After school she monitors the area where students catch
 8 the bus, and she talks to anyone who approaches her.
 9 Q. When do you first remember Miss Russo coming to
 10 your school?
 11 A. Maybe early November. I'm not taking a guess
 12 at this.
 13 Q. Early November of 2001?
 14 A. 2001.
 15 Q. So you don't remember seeing her at your campus
 16 last year, the last school year?
 17 A. No. No, she just began. She just got that
 18 office.
 19 Q. Do you know when she took office?
 20 MS. TEITELBAUM: Objection. Asked and
 21 answered.
 22 THE WITNESS: No, I don't.
 23 BY MS. STRONG:
 24 Q. So you said -- how often does Miss Russo come
 25 onto the campus?

1 A. Whenever she can. Maybe twice a week, at
 2 least.
 3 Q. Sometimes more than twice a week?
 4 A. Sometimes.
 5 Q. And that's basically since November 2001, to
 6 the best of your recollection?
 7 A. Yes.
 8 Q. Okay. And you said she'll walk around campus.
 9 When is it that you see Miss Russo walking around
 10 campus?
 11 A. Passing periods, nutrition and lunch, and after
 12 school.
 13 Q. And so when she comes to school, on the days
 14 that she comes to your high school, she seems to be
 15 there the entire day; is that correct?
 16 A. Sometimes after 12. It's usually after 12.
 17 Sometimes she does make it a little bit after eight,
 18 I've seen her arrive at the office.
 19 Q. In the morning?
 20 A. Yes.
 21 Q. But why is it that you understand that she
 22 comes after 12 on most days?
 23 A. I asked for a meeting, to speak to her, and she
 24 told me that she's usually not there before eight.
 25 Q. Before eight or before 12?

1 A. I mean before 12.
 2 Q. Okay. So sometimes she's there before 12, but
 3 usually she's there after 12 and she stays after school
 4 to monitor the bus areas after school; is that correct?
 5 A. Yes.
 6 Q. Are students aware that Miss Russo is on campus
 7 approximately two times a week, if not more?
 8 MS. TEITELBAUM: Objection. Calls for
 9 speculation.
 10 BY MS. STRONG:
 11 Q. Go ahead. You can answer.
 12 A. Yes.
 13 Q. And how is it -- how are students informed of
 14 Miss Russo coming to the campus?
 15 MS. TEITELBAUM: Same objection.
 16 THE WITNESS: She introduced herself over the
 17 intercom.
 18 BY MS. STRONG:
 19 Q. Oh, she did?
 20 A. Yes.
 21 Q. And what did she say when she introduced
 22 herself?
 23 A. I had a chance to listen to a brief speech she
 24 made, but I didn't listen to all of it. She just
 25 introduced herself. That's all I was there to listen

1 to.
 2 Q. Where did you go?
 3 A. Career center. My home room doesn't have
 4 speakers.
 5 Q. Oh, okay.
 6 A. So I went to the career center where they do
 7 have speakers, and then I had to leave and go to my home
 8 room. So that's how I heard.
 9 Q. But on that announcement did Miss Russo explain
 10 she would be available to meet with students if students
 11 wanted to come and talk to her?
 12 A. I didn't hear her say that.
 13 Q. But you explained -- I believe you testified
 14 earlier that students can go up and talk to her whenever
 15 they want to; is that true?
 16 A. Yes.
 17 Q. And why is it that you understand that students
 18 can go up to talk to her whenever they want to?
 19 A. Because she makes herself available by walking
 20 around campus, and I even approached her myself, and
 21 I've seen many classmates approach her. So, you know,
 22 assumption.
 23 Q. That's exactly what I was trying to understand,
 24 how it was that you had this understanding.
 25 A. Yes.

1 Q. That's helpful. Thank you.
 2 You explained also that she will monitor the
 3 bus area as students are leaving school.
 4 A. Yes.
 5 Q. Is that correct?
 6 A. Not so much monitor, but she would stand
 7 outside in front of our school where the buses pick up
 8 students, and she would stay there to make sure nothing,
 9 no fights break out, anything like that.
 10 Q. Why is it that you believe that's why she's
 11 standing there?
 12 A. Well, I seen fights break out there, and that's
 13 why they go out, you know, to monitor, make sure we get
 14 to our buses safe and stuff like that.
 15 Q. Has anyone discussed with you the role of any
 16 administrator who stands out and watches students go to
 17 the bus?
 18 A. No. But I assume safety.
 19 Q. Okay. Do you think it works or it helps to
 20 have Miss Russo stand out?
 21 A. Yes.
 22 Q. And why do you think that?
 23 A. Usually, if students see teachers, they feel
 24 more safe and they're less likely to get into a fight
 25 because they have an adult supervising.

1 Q. So when Mr. Helfend asked you at the council
 2 meeting about Miss Russo's interactions with the
 3 students, you responded that she did interact with the
 4 students; is that correct?
 5 A. Yes.
 6 Q. And did the students in that meeting -- I guess
 7 were they in agreement that she did interact well with
 8 the students?
 9 A. Yes. It wasn't a student council meeting, it
 10 was an informal get-together. It was our potluck and he
 11 was there. We didn't set up anything.
 12 Q. Do you think it's made a difference to have
 13 Miss Russo around your school?
 14 MS. TEITELBAUM: Objection. Vague and
 15 ambiguous.
 16 BY MS. STRONG:
 17 Q. Go ahead.
 18 A. Yes.
 19 Q. In what way?
 20 A. Well, she seems like she's there to help us and
 21 listen to us if we have any problems and tries to the
 22 best of her ability to solve them.
 23 Q. Anything else that you can think of in terms of
 24 how it's made a difference to have Miss Russo at your
 25 school?

1 A. No.
 2 Q. With respect to the meetings of the Locke
 3 student union group, were there agendas for those
 4 meetings?
 5 A. Yes.
 6 Q. And do you know if anybody retained copies of
 7 the agendas for the meeting?
 8 A. I don't know, but I'm sure there's someone who
 9 kept them for the record.
 10 Q. Who do you think that would be?
 11 A. I can't say. I'm not sure.
 12 Q. Would one of the teacher supervisors,
 13 Mr. Motevalli, Mr. Cubias, Mr. Shah, have them?
 14 A. Maybe, but I don't think so. They weren't
 15 really over us, they were just there. Probably, most
 16 likely a student would have a copy, but I can't say and
 17 point out who.
 18 Q. Was anyone assigned to be the secretary of the
 19 group?
 20 A. I'm trying to think about that, but I don't --
 21 I don't -- not that I recall.
 22 Q. Okay. And do you have any notes from the
 23 meeting, the Locke student union group meetings?
 24 A. No, I threw them away.
 25 Q. Do you know if anybody has kept notes or

1 minutes of the meetings?
 2 A. No, I don't know for a fact.
 3 Q. When did you throw away those notes?
 4 A. Probably right after.
 5 Q. Right after each meeting?
 6 A. Yes.
 7 Q. And during those meetings are some of the
 8 issues discussed? Those that you've already identified
 9 for me today?
 10 A. Yes.
 11 Q. Regarding the conditions at your school?
 12 A. Yes. Most. I don't remember each item.
 13 Q. We'll get into each of the issues that you've
 14 identified in detail as we proceed.
 15 Do you know any other students involved in this
 16 lawsuit?
 17 A. No, I can't identify them that I know for sure
 18 are involved.
 19 Q. Do you have any understanding of any students
 20 that you know of as participating in this lawsuit?
 21 A. Not for a fact. I assume some, but I don't
 22 think so.
 23 Q. What do you mean you assume so? Who is it that
 24 you assume is involved?
 25 A. Patti Munoz.

1 Q. Anyone else?
 2 A. Natalie Perkins-Ali.
 3 Q. Anyone else?
 4 A. No. I don't know of any teachers or anything.
 5 Q. And who is Patti Munoz?
 6 A. She's my friend.
 7 Q. Okay. Is she a student at Locke High School?
 8 A. Yes.
 9 Q. And what grade is she in?
 10 A. 12th.
 11 Q. And have you had a discussion with her about
 12 this lawsuit?
 13 A. No.
 14 Q. Why is it that you believe she might be
 15 involved with the lawsuit?
 16 A. She's very outspoken.
 17 Q. Do you know if she's ever met with any of the
 18 attorneys involved with this lawsuit?
 19 A. Yes.
 20 Q. Who has she met with?
 21 A. I don't know who specifically.
 22 Q. How is it that you have an understanding that
 23 she met with some of the attorneys in this lawsuit?
 24 MS. TEITELBAUM: You can answer to the extent
 25 that you didn't learn it from any communication with

1 your own attorneys.
 2 THE WITNESS: What?
 3 MS. TEITELBAUM: If you only know about her
 4 involvement from speaking with one of your attorneys,
 5 then I don't want you to discuss anything that you
 6 learned from speaking with one of your attorneys.
 7 THE WITNESS: No, I didn't learn it from --
 8 BY MS. STRONG:
 9 Q. Go ahead. How is it that you have an
 10 understanding that she might be involved with this or
 11 she spoke with some attorneys involved in this lawsuit?
 12 A. She went up to them and talked to them.
 13 Q. Okay. Where was this?
 14 A. We had a beach party.
 15 Q. A beach party?
 16 A. Yeah, get-together.
 17 Q. When did you have a beach party?
 18 A. Somewhere along the summer.
 19 Q. So the summer of 2001?
 20 A. Yes.
 21 Q. And who was present at the beach party?
 22 A. Patti Munoz.
 23 Q. Let me back up. Was it with a particular
 24 group?
 25 A. It was with some of the members.

1 Q. Of the student union group?
 2 A. Yes. And some friends.
 3 Q. All right. Can you go ahead and try and list,
 4 to the best of your recollection, who was present at
 5 that beach party?
 6 A. Okay. Did you write Patti Munoz down?
 7 Q. Yes.
 8 A. Kenny Webb, Chris Tan, Miss Shah. And that's
 9 all I can remember. I think it was just us.
 10 Q. So how many, approximately, total?
 11 A. Oh, and Rosa, Rosa Cuevas, and her younger
 12 brother.
 13 Q. So approximately seven people present?
 14 A. Yes.
 15 Q. Okay. So I assume this party took place at the
 16 beach.
 17 A. Yes.
 18 Q. What beach was this? Do you know?
 19 A. Venice.
 20 Q. Okay. Was it early in the summer or late in
 21 the summer?
 22 A. I think it was late in the summer. I can't
 23 give you an approximate. That's my approximate.
 24 Q. Okay. Before the LAUSD board meeting or after?
 25 A. I don't know.

1 Q. Okay. So you said some attorney spoke with
 2 some of the students at that beach party.
 3 A. No, not at that beach party.
 4 Q. Oh, okay.
 5 A. But I -- that's how I saw them talking to them.
 6 Q. You need to explain it to me because I'm not
 7 following.
 8 A. Oh, well, we had a close relationship with our
 9 attorneys. They weren't just our attorneys, they were
 10 our friends. And I assume that Patti, outspoken person,
 11 told her, told one of them. Oh, and Laura.
 12 Q. Laura?
 13 A. I don't know her last name.
 14 Q. Was at the party?
 15 A. Yes.
 16 MS. TEITELBAUM: Can we take a break?
 17 MS. STRONG: Go off the record for a second.
 18 (Brief recess.)
 19 MS. STRONG: Back on the record.
 20 Q. Why don't we start with a more simple question,
 21 which is: Who were your attorneys back in August of
 22 2001? I'm sorry. Back during the summer of 2001.
 23 A. Gladys. I don't remember her last name either.
 24 Laura and Chris Tan.
 25 Q. Do you know who Gladys, what organization or

1 law firm Gladys worked for?
 2 A. The ACLU.
 3 Q. How about Laura?
 4 A. All the ACLU.
 5 Q. And they were all attorneys?
 6 A. Yes.
 7 Q. How do you know that?
 8 A. They told me.
 9 Q. You said that Laura was present at the beach
 10 party that you were describing prior to you having taken
 11 a break here. Laura, is that one of your attorneys from
 12 the ACLU?
 13 A. Yes.
 14 Q. Were there any other attorneys present at that
 15 beach party? Chris Tan, was she present?
 16 A. Yes. He.
 17 Q. He. Thank you.
 18 And was any other attorney present at that
 19 beach party?
 20 A. No.
 21 Q. What was the reason for the beach party?
 22 A. It was just a get-together.
 23 Q. So it wasn't to meet with your attorneys, per
 24 se?
 25 A. No.

1 Q. So is it your understanding that this is the
2 first time Patti Munoz spoke with either Chris Tan or
3 Laura?
4 A. I don't know.
5 Q. Do you have an understanding as to whether they
6 spoke with her before that time?
7 A. I don't know for sure. I don't know at all,
8 actually, when she contacted them or if she spoke to
9 them or not at a certain time.
10 Q. At that party, did it appear that Patti Munoz
11 knew Chris Tan and Laura prior to the party itself?
12 A. Yes.
13 Q. So based on their interactions, you understood
14 that they, at least, had met at some time before?
15 A. Yes.
16 Q. And what was it that gave you that impression?
17 A. She knew their names.
18 Q. Okay.
19 A. And she was comfortable with them.
20 Q. But you never spoke with Patti about her having
21 had any conversations with either of these individuals?
22 A. No.
23 Q. Okay. Do you talk with Patti Munoz now?
24 A. Yes.
25 Q. How often do you speak with Patti Munoz?

1 A. About four days of the week.
2 Q. Have you ever discussed this lawsuit with her?
3 A. No.
4 Q. Did you tell her that you were going to have
5 your deposition taken?
6 A. No. I haven't talked to her since the break.
7 But during school I talk to her about four times a week.
8 Q. Did she ever mention to you her deposition --
9 A. No.
10 Q. -- whether she had one or not?
11 A. No.
12 Q. Okay. With respect to Natalie Perkins-Ali, why
13 is it that you believe she may be involved with this
14 lawsuit?
15 A. The same thing. She's active and she's
16 outspoken as well.
17 Q. Okay. Do you know if she's had any contact
18 with any of the attorneys in the lawsuit?
19 A. Yeah, I've seen her talk to attorneys.
20 Q. And where is this that you've seen her talk to
21 attorneys?
22 A. I can't tell you exactly where, but I've seen
23 her talk to one of the attorneys.
24 Q. Why is it that you can't tell me where?
25 A. Because I don't know now.

1 Q. At school somewhere?
2 A. I don't know. I didn't know her until the
3 meetings and stuff.
4 Q. You didn't know her till what meetings?
5 A. Locke High School student union meetings. Her
6 father was involved, too.
7 Q. You didn't know her until those meetings; is
8 that what you're saying?
9 A. No, I didn't know her until those meetings, so
10 I didn't see her every day at school or talk to her
11 every day.
12 Q. Well, have any of the attorneys in this lawsuit
13 ever come to Locke High School?
14 A. No, not to Locke High School.
15 Q. Okay. Have they gone to any school, that
16 you're aware of?
17 A. No, not that I'm aware of. I don't know.
18 Q. Okay. When did you first meet an attorney
19 involved in this lawsuit?
20 A. I'd say around the -- towards the end of the
21 school year, May or June.
22 Q. Where were you when you first met an attorney
23 in relation to this lawsuit?
24 A. We were at a restaurant.
25 Q. Okay. What restaurant?

1 A. Denny's.
2 Q. And were you there to meet with the attorneys
3 or were you there for some other purpose?
4 A. I was there to meet with the attorneys.
5 Q. How is it that you arranged a meeting to meet
6 with the attorneys?
7 A. The group members arranged a meeting with them.
8 Q. Do you know how there was contact between the
9 group, any of the group members and the attorneys?
10 A. No, I don't know.
11 Q. Okay. Do you remember who it was in the group
12 that mentioned -- first mentioned the ACLU attorneys?
13 A. No.
14 Q. Okay. So at that meeting at Denny's, which was
15 at some point the end of May or June, who was present?
16 A. I'll just tell you the ones that I do remember.
17 There was a lot of them.
18 Q. Okay.
19 A. Starlett Brown, Crystle Carrillo.
20 Q. Crystle, what's her last name?
21 A. Carrillo. That's all I remember.
22 Q. How many people were present, approximately?
23 A. I'd say about more than five students. Five to
24 10 students.
25 Q. Was Rosa present?

1 A. I don't remember her being there. But I don't
 2 know.
 3 Q. And then what attorneys were present?
 4 A. That I remember, was Gladys and Dori. That's
 5 all I remember.
 6 Q. And Starlett Brown, do you know if she's
 7 involved with this lawsuit at all?
 8 A. I know she's a plaintiff, but I don't know if
 9 she's doing the same thing I am.
 10 Q. Okay. How is it that you know that she's a
 11 plaintiff?
 12 A. She made a declaration.
 13 Q. And how do you know that she made a
 14 declaration?
 15 A. At that Denny's we made a private, little --
 16 Q. Meetings?
 17 A. Yeah, meeting, and we made our declarations.
 18 Q. I mean, I'll get into what you did
 19 specifically, but how is it that you know she made a
 20 declaration at that meeting?
 21 A. We did it in groups. We all got to speak at
 22 our certain times.
 23 Q. So you broke up into smaller groups?
 24 A. Yes.
 25 Q. So who was in a group with you?

1 A. Starlett and Crystle.
 2 Q. That's how you remember them?
 3 A. Yes, that's how I remember them.
 4 Q. Okay. And so the three of you spoke with an
 5 individual attorney; is that correct?
 6 A. Yes.
 7 Q. And when you say "we made our declarations,"
 8 what do you mean by that?
 9 A. We told our individual attorneys about our
 10 experiences at school.
 11 MS. TEITELBAUM: I'm going to instruct you not
 12 to discuss the specific things that you said.
 13 BY MS. STRONG:
 14 Q. Okay. And by telling about your experiences,
 15 did you understand that to be making a declaration?
 16 A. Yes.
 17 Q. What is a declaration?
 18 A. From what I know, is like when you talk about,
 19 like, on formal -- how do you say?
 20 Q. Just do your best to try to explain to me what
 21 you understand a declaration to be.
 22 A. It's, like, when you say the truth, like when
 23 you give your statement on something that you're talking
 24 about.
 25 Q. Did you ever sign anything that you believe to

1 be a declaration?
 2 A. Yes.
 3 Q. And was it the same day that you signed
 4 something you believe to believe a declaration?
 5 A. No.
 6 Q. When did you sign something you believe to be a
 7 declaration?
 8 A. July, after revising that declaration that I
 9 made during May or June.
 10 Q. Okay. So in May or June you gave an oral
 11 recitation of the conditions or your experiences at the
 12 school to an attorney; is that correct?
 13 A. Yes.
 14 Q. Okay. And then at some point you received a
 15 written form of your declaration; is that correct?
 16 A. Yes.
 17 Q. And how did you receive the written form of
 18 your declaration?
 19 A. I met with one of my attorneys.
 20 Q. Okay. And where was that meeting?
 21 A. At a McDonald's.
 22 Q. Who else was present at the meeting?
 23 A. Starlett and Crystle.
 24 Q. Okay.
 25 A. Some other students from another high school.

1 I don't know their names.
 2 Q. Do you know what high school they're from?
 3 A. No.
 4 Q. Okay. And do you remember, you know, how long
 5 after the first meeting at Denny's was the meeting at
 6 McDonald's?
 7 A. I'd say about a month.
 8 Q. Okay.
 9 A. If it was in May, two months. If it was in
 10 June, it was about a month.
 11 Q. The McDonald's meeting took place in July?
 12 A. Yes.
 13 Q. And upon receiving the written form of your
 14 declaration you made some changes to it?
 15 A. Yes.
 16 Q. Okay. Were the changes implemented there, or
 17 did you then receive another copy of your declaration at
 18 some later time?
 19 A. I then received another copy of the changes
 20 that I had made.
 21 Q. When did you receive the next copy of your
 22 declaration?
 23 A. I don't remember when, exactly when. No, I
 24 don't remember. I can't say.
 25 Q. Approximately how much later was it from that

1 meeting in July?
 2 A. It was still during the summer. I don't know
 3 when.
 4 Q. Okay. That's fine.
 5 Do you think it was still in June? I mean, a
 6 week later, or in August a few weeks later?
 7 A. I don't know. But I know it was still during
 8 the summer.
 9 Q. And how did you receive that declaration?
 10 A. I went to their office.
 11 Q. The attorney's office?
 12 A. Yes.
 13 Q. This is the ACLU?
 14 A. Yes.
 15 Q. So then you received it there. And then at
 16 that point did you sign your declaration?
 17 A. Yes.
 18 Q. Okay. Were the changes that you'd requested be
 19 made implemented in that final version of your
 20 declaration?
 21 A. Yes.
 22 Q. Okay. What did you request to be changed in
 23 your declaration?
 24 MS. TEITELBAUM: Let's see where you go with
 25 this.

1 THE WITNESS: I rephrased something.
 2 BY MS. STRONG:
 3 Q. Okay. What was it that you rephrased?
 4 A. I'm not -- I don't know exactly what I
 5 rephrased, but I know I rephrased a sentence.
 6 Q. Okay. Do you remember the issue that it
 7 related to?
 8 A. No. I just remember that she wrote it in one
 9 way and I meant it the other way, so she fixed that.
 10 Q. Who was it that fixed it?
 11 A. It was either Laura or Gladys.
 12 Q. Okay.
 13 A. I don't know.
 14 Q. That's fine.
 15 In terms of just general subject matter, was it
 16 regarding books or bathrooms? Or do you have any
 17 recollection as to what the general subject matter was
 18 that you changed?
 19 A. No, I don't know.
 20 Q. Okay. And were you allowed to keep a copy of
 21 your -- the first draft of your declaration?
 22 A. I didn't ask for one. I'm sure that I was able
 23 to.
 24 Q. Did you keep a copy?
 25 A. No. I was happy with the copy.

1 Q. Now, you said that Starlett Brown and Crystle
 2 Carrillo were present with you at the Denny's and gave
 3 their experiences as well for declarations. Do you know
 4 if Starlett Brown ever received a declaration to
 5 actually sign?
 6 A. Yes. We all received it there.
 7 Q. Because they were present at the McDonald's
 8 meeting in July?
 9 A. Yes.
 10 Q. Okay. And do you know if Starlett Brown made
 11 any edits to her declaration?
 12 A. I don't know.
 13 Q. Do you know if Starlett Brown ever signed her
 14 declaration?
 15 A. I don't know.
 16 Q. Did she sign it at McDonald's? Do you recall?
 17 A. No, I didn't see it.
 18 Q. Either way you don't know?
 19 A. No, I don't know.
 20 Q. Did you ever talk to Starlett Brown after the
 21 McDonald's regarding the declaration or anything else
 22 related to this lawsuit?
 23 A. No.
 24 Q. Do you ever see Starlett Brown?
 25 A. Yes.

1 Q. How often do you see her?
 2 A. Every day.
 3 Q. But you never talked about the declarations or
 4 the lawsuit or anything like that?
 5 A. No, we're normal friends.
 6 Q. And Crystle Carrillo, do you know if she ever
 7 signed a declaration?
 8 A. No, I don't know.
 9 Q. And how often do you see Crystle?
 10 A. Every day.
 11 Q. And have you ever spoken with Crystle about her
 12 declaration or any other issue relating to this lawsuit?
 13 A. No. I don't see them every day now, but I see
 14 them every day at school.
 15 Q. Correct. Not when you're on winter break, but
 16 when you're in school?
 17 A. Yes.
 18 Q. Do you know anyone who was present at that
 19 meeting but didn't want to write -- I'm sorry, let me
 20 clarify.
 21 Do you know anyone who was present at the
 22 meeting at Denny's who did not want to write a
 23 declaration or sign a declaration in the case?
 24 MS. TEITELBAUM: Objection. Calls for
 25 speculation.

1 THE WITNESS: No, I don't know.

2 MS. STRONG: Okay.

3 Q. So now I think we started this whole line of
4 questioning with me asking you how it was you thought
5 Natalie Perkins-Ali was involved with this lawsuit. Was
6 she present at the Denny's meeting?

7 A. I don't recall her, so I don't know. I don't
8 recall her being there.

9 Q. So is there anything specific that you could
10 think of that gives you the belief that she is involved
11 with this lawsuit?

12 A. No, there's nothing specific. I just assume
13 because I think we're the three most outspoken members.

14 Q. And that's you, Patti Munoz and Natalie
15 Perkins-Ali?

16 A. Yes.

17 Q. And that day at Denny's, is that the day that
18 you believe the ACLU became your attorneys in this
19 lawsuit?

20 A. Yes.

21 Q. Did you do anything to prepare for your
22 deposition here today?

23 A. Yes.

24 Q. Okay. What did you do? Other than
25 conversations you had with your attorneys.

1 relate to the conditions at your school?

2 A. Well, I didn't find any, so I didn't look for
3 any. I don't have those anymore.

4 Q. Okay. But you knew that you didn't have any,
5 so you didn't look for any; is that what you're
6 testifying?

7 A. Well, I looked for the papers that pertained to
8 the deposition.

9 Q. "Pertained to the deposition," what do you mean
10 by that?

11 A. That had to do with the lawsuit.

12 Q. In your mind, that would include notes of any
13 condition of your school and anything like that?

14 A. Yes.

15 Q. So you didn't find anything like that because
16 you didn't retain any notes of the conditions of your
17 school?

18 A. No.

19 Q. And when was it that you looked for these
20 documents?

21 A. Wednesday night.

22 Q. So that's three days ago, approximately?

23 A. Yes. And yesterday.

24 Q. And the meeting with your attorney Jill, was
25 that the first time you were asked to look for any

1 A. We had a meeting yesterday.

2 Q. Okay. And that was with your attorney?

3 A. Yes.

4 Q. Who was that meeting with?

5 A. Jill.

6 Q. Anything else that you did to prepare for your
7 deposition?

8 A. No.

9 Q. Did you read any documents in preparation for
10 this deposition? Look at me. It's okay.

11 A. I read my statement again, my declaration.

12 Q. You read your declaration?

13 A. Yes.

14 Q. Okay. Is there anything else that you did in
15 preparation for this deposition?

16 A. I gathered those papers.

17 Q. Okay. You gathered the documents that were
18 produced by your attorney earlier this morning; is that
19 correct?

20 A. Yes.

21 Q. What kind of documents were you looking for
22 when you gathered these documents?

23 A. Report cards, standardized tests, absent slips.
24 That's about it.

25 Q. Did you look for any notes or documents that

1 documents?

2 A. No.

3 Q. You were asked before that?

4 A. Yes. Wednesday, Wednesday night was when I was
5 asked to gather those documents.

6 Q. So the meeting with your attorney Jill was
7 yesterday.

8 A. Yes.

9 Q. So on the phone you were asked on Wednesday
10 night to look for the documents. That was the first
11 time you'd been asked to look for documents; is that
12 correct?

13 A. Yes.

14 Q. Anything else that you did in preparation for
15 your deposition, any other documents you reviewed?

16 A. No.

17 Q. What about the agenda that you reviewed
18 relating to the LAUSD meeting, was that in preparation?
19 A. No. That was -- I just happened to see it when
20 I was looking through my papers.

21 Q. Would you consider that -- is that something
22 you produced here today, the agenda?

23 A. No. Right? No, I didn't.

24 Q. You don't have to ask your attorney. You can
25 just respond to my questions.








1 A. I just asked her what copies she made. No, I
 2 don't think I brought it with me.
 3 Q. Okay. Is that something that you would
 4 consider to relate to the conditions at your school or
 5 the issues in this lawsuit?
 6 A. Some of the issues.
 7 Q. The agenda?
 8 A. Yes.
 9 Q. And is there a reason why you didn't give that
 10 to your attorney to produce in this case?
 11 A. No. I forgot to put it in this.
 12 Q. I would ask that you actually give that
 13 document to your -- a copy of that document to your
 14 attorney so that she can produce it in this litigation.
 15 Is that understood, counsel?
 16 MS. TEITELBAUM: I will review it, review it
 17 for responsiveness.
 18 MS. STRONG: Given that the request related to
 19 the conditions at the school, and I think she already
 20 testified that they do relate to the conditions at the
 21 school, so it should be produced in response to this
 22 litigation.
 23 MS. TEITELBAUM: If the agenda does appear to
 24 relate, we will produce it.
 25 ///

1 BY MS. STRONG:
 2 Q. Have you spoken with anyone else about your
 3 deposition today?
 4 A. My mother.
 5 Q. And when did you talk with your mother about
 6 your deposition?
 7 A. I spoke to her before I went on break. I can't
 8 give you a date. And on Wednesday night. And again
 9 yesterday night.
 10 Q. You said you spoke to her before you went on
 11 break. About your deposition?
 12 A. My San Francisco vacation about my deposition.
 13 Q. Did you know you were going to have your
 14 deposition taken at that time?
 15 A. Yes.
 16 Q. So you learned about it before you went on
 17 break?
 18 A. Yes. Not on the Christmas break, but on my
 19 vacation to San Francisco.
 20 Q. Which was before your winter break?
 21 A. No. It was, like, maybe -- I wish I had dates.
 22 Q. It's okay. Memories aren't perfect.
 23 A. Maybe a week after my -- no. The first week of
 24 my vacation. I left on Thursday.
 25 Q. Okay. And what did you discuss with your

1 mother regarding your deposition?
 2 A. I told her about what it was all about.
 3 Q. And what did she say in response?
 4 A. She just -- she was just there listening.
 5 Q. And what did you tell her it was all about?
 6 A. I told her it had to do with school conditions;
 7 that it was the work that I did in the summer paying
 8 off.
 9 Q. Anything else you told her?
 10 A. No, not really. She didn't ask that many
 11 questions.
 12 Q. Okay. And when you said it was the work you
 13 did in the summer paying off, what work are you
 14 referring to?
 15 A. Getting attention from the school board.
 16 Q. And how is it that you feel that your efforts
 17 to get attention from the school board have paid off in
 18 this lawsuit?
 19 A. Well, I think that they're paying off now by
 20 getting the state's attention and being here.
 21 Q. And that's from the efforts that you took
 22 during the summer of 2001?
 23 A. Yes. And throughout March.
 24 Q. Have you seen anyone else's declaration in this
 25 lawsuit?

1 A. No. I've seen -- well, I didn't see, but a
 2 highlighted comment that she read to me, that Jill read
 3 to me. But I didn't see, I didn't have my hands on the
 4 declaration.
 5 Q. So you've learned about some other individuals'
 6 declarations, but you actually haven't read any of them?
 7 A. No, not learned, just I got, like, a quote, per
 8 se. That's all.
 9 Q. From another person's deposition?
 10 A. Yes.
 11 Q. And what was that quote that you learned?
 12 MS. TEITELBAUM: I'm going to instruct you not
 13 to answer communications between yourself and your
 14 attorney.
 15 BY MS. STRONG:
 16 Q. Are you going to follow your attorney's
 17 instruction?
 18 A. Yes.
 19 Q. Did you know the other person's declaration
 20 which was being quoted to you?
 21 A. Did I know the person?
 22 Q. Yes.
 23 A. No.
 24 Q. How old are you?
 25 A. 17.

1 Q. And how long have you attended Locke High
 2 School?
 3 A. This is my fourth year.
 4 Q. So you started at Locke in 9th grade; is that
 5 correct?
 6 A. Yes.
 7 Q. And in what year was that?
 8 A. '98.
 9 Q. Where do you live?
 10 A. Los Angeles.
 11 Q. What's your address?
 12 MS. TEITELBAUM: I'm going to instruct you not
 13 to answer that.
 14 MS. STRONG: Will you stipulate that you'll
 15 accept service for the witness for all purposes related
 16 to this litigation?
 17 MS. TEITELBAUM: Yes, we will.
 18 BY MS. STRONG:
 19 Q. How long have you lived at the current home
 20 address?
 21 A. Since the 6th grade.
 22 Q. Okay. That's fine.
 23 How far is -- well, who else lives with you at
 24 that address?
 25 A. My mother, my stepfather, my two younger

1 brothers.
 2 Q. Are your brothers in school?
 3 A. Yes.
 4 Q. What schools do they attend?
 5 A. You want the names or you want grade school?
 6 They go to elementary and preschool.
 7 Q. I'm sorry. The names of the schools. Thanks.
 8 A. They both go to 107th Elementary.
 9 Q. And what grades are they in? You said one is
 10 in preschool.
 11 A. One is in preschool. And the other one I don't
 12 know.
 13 Q. Not sure what grade.
 14 How old are they? How old is the one that's
 15 not in preschool?
 16 A. I think he's eight or nine.
 17 Q. How far is Locke from your home?
 18 A. 
 19 Q. 
 20 A. 
 21 Q. 
 22 A. 
 23 Q. 
 24 A. 
 25 Q. Okay. So I assume there's no other high school

1 closer to you than Locke?
 2 A. No.
 3 Q. Where did you go to school before Locke?
 4 A. Peary Middle School.
 5 Q. And how long were you at Peary Middle School
 6 for?
 7 A. Three years.
 8 Q. And where did you go to school before Peary?
 9 A. Amestoy.
 10 Q. I'm sorry?
 11 A. Amestoy.
 12 Q. A M E S T O Y?
 13 A. Uh-huh.
 14 Q. And how long were you at Amestoy?
 15 A. First through fifth, so five years. No. No.
 16 No. Wait. Third through fifth.
 17 Q. Where were you prior to Amestoy?
 18 A. Where?
 19 Q. What school did you attend prior to Amestoy?
 20 A. I don't remember the other elementary school
 21 that I was in.
 22 Q. And where is Amestoy?
 23 A. Gardena.
 24 Q. Is that a public school?
 25 A. Yes.

1 Q. And where is Peary Middle School?
 2 A. Gardena.
 3 Q. Again, is that a public school?
 4 A. Yes.
 5 Q. Do you study or do homework at your house?
 6 A. Yes.
 7 Q. And where do you tend to do your studying?
 8 A. In my room.
 9 Q. Okay. Do you have a desk for it?
 10 A. Yes.
 11 Q. And how often do you study at home?
 12 A. I'd say about a good two hours, maybe more,
 13 maybe less. But approximately two hours.
 14 Q. Every night?
 15 A. Yes.
 16 Q. And is that Monday through Friday?
 17 A. Yes.
 18 Q. Do you ever study on the weekends?
 19 A. No. If it's a big test, but no.
 20 Q. If you have a big test, you might study on the
 21 weekends?
 22 A. Yes.
 23 Q. And when you say you study approximately two
 24 hours a night, is that covering all your subjects?
 25 A. Yes.

- 1 Q. And do you usually study several different
2 subjects each night?
3 A. It depends on how the load of homework is.
4 Sometimes there's, like, one or two classes that need
5 attention. Not every class needs attention.
6 Q. Every night?
7 A. Uh-huh.
8 Q. Do you have a computer at home?
9 A. Yes.
10 Q. Do you have access to the Internet at home?
11 A. Yes.
12 Q. And are you able to use that computer for your
13 homework at your desire?
14 A. Yes.
15 Q. Do you study anywhere else other than at your
16 home?
17 A. At my friend's house.
18 Q. Okay. Whose house?
19 A. Do I have to say her name? My friend Kim.
20 Q. Kim. What's Kim's last name?
21 A. Tran.
22 Q. Tran?
23 A. Uh-huh.
24 Q. Anywhere else that you study?
25 A. School. No.

- 1 Q. When you say you study at school, do you study
2 after school or during nutrition or lunch?
3 A. Yeah, during nutrition or lunch I have to study
4 and do homework.
5 Q. Okay. And where would you do that?
6 A. College center.
7 Q. Is there a library at your school?
8 A. Yes.
9 Q. Is there a reason that you don't study in the
10 library?
11 A. It doesn't have many resources.
12 Q. And does the college center have resources?
13 A. It's more quiet than the library and more
14 peaceful, and you can find people to tutor you there.
15 Q. So there's tutoring offered at the college
16 center during lunch?
17 A. It's not offered, but most of the peer
18 counselors are there.
19 Q. So they will assist you with your homework?
20 A. It's a good place to do homework in.
21 Q. How did you learn about doing homework in the
22 college center?
23 A. I'm a peer counselor myself.
24 Q. I'm sorry?
25 A. I'm a peer counselor.

- 1 Q. Can other students study in the college center
2 if they'd like to?
3 A. Yes.
4 Q. When you said it's quieter in the college
5 center, are there a lot of students in the library
6 during nutrition and lunch?
7 A. I haven't been there, so I don't know. But I
8 find it more useful to be at the college center.
9 Q. Okay. But you've never gone to the library for
10 nutrition or lunch?
11 A. I did in the 9th grade, but only to look up a
12 word or stay away from the quad area.
13 Q. And are there a lot of people, I mean based on
14 your experience from 9th grade, having been in the
15 library during nutrition and lunch, are there a lot of
16 students during nutrition and lunch?
17 A. No, not that many.
18 Q. But you think it's noisy in there during
19 nutrition and lunch?
20 A. Yes.
21 Q. And why is that?
22 A. Because students hang out outside the library
23 and they don't close the doors.
24 Q. Okay. Is the library near the nutrition and
25 lunch areas where students spend their time during --

- 1 that was a confusing question. Let me rephrase.
2 Is the library located near the area where
3 students hang out during nutrition and lunch?
4 A. Yeah. Well, it's a territory that they have
5 taken. It's not, like, part of the quad, but they've
6 made it a place to hang out.
7 Q. Students have?
8 A. Yes.
9 Q. So it's a place that's available for students
10 to go during nutrition and lunch if they'd like to?
11 A. Yes.
12 Q. But it's not necessarily near the other, like,
13 the cafeteria?
14 A. It's not near the cafeteria.
15 Q. Did you ever ask anyone to close the doors when
16 you went to the library in 9th grade during nutrition
17 and lunch so you wouldn't hear the noise of the students
18 out there?
19 A. No. They try to keep the doors open for
20 everyone so that people can come in and out.
21 Q. People can't come in and out if the doors are
22 physically closed?
23 A. They keep the doors open so people can come in
24 and out of the library, so other students come in. And
25 if you want to leave, you can get out. So they don't

1 close the door.
 2 Q. You can get in and out of a door if it isn't
 3 locked; right?
 4 A. Yeah. But the librarian, I guess, chooses not
 5 to close it or give us that option.
 6 Q. Did you ever ask the librarian to close it to
 7 try and keep out some of the noise?
 8 A. No.
 9 Q. So does anyone -- you mentioned that there are
 10 people around in the career center -- is that what it's
 11 called? Or college center?
 12 A. College/career center.
 13 Q. You mentioned that there are people there that
 14 can assist you with your homework. Do you get
 15 assistance from anyone else with your homework?
 16 A. No. I usually don't get assistance, but that's
 17 a place where you can if you want to.
 18 Q. Okay.
 19 A. Because there's college students and there's
 20 college peer counselors. I've gotten help before, but I
 21 don't do it every day. It's just a place that has desks
 22 and easier to sit.
 23 Q. Study?
 24 A. Yeah.
 25 Q. So you don't get -- you've not -- you've gotten

1 assistance on occasion there, but you've not gotten any
 2 other assistance with respect to your homework outside
 3 of your classrooms from 9th grade on at Locke?
 4 A. I used to go to tutoring where the teachers
 5 used to tutor, but it wasn't very effective.
 6 Q. Okay. Any other assistance that you can think
 7 of since you've been at Locke since 9th grade?
 8 A. Teachers.
 9 Q. Outside of class?
 10 A. Sometimes. Sometimes in and sometimes out,
 11 when they have time.
 12 Q. Anything else you can think of?
 13 A. No.
 14 Q. Okay. With respect to the tutoring, what
 15 tutoring did you take part in?
 16 A. Math tutoring.
 17 Q. And when was that?
 18 A. 9th grade.
 19 Q. And who conducted the math tutoring?
 20 A. It was a group of teachers teaching, tutoring
 21 in every subject.
 22 Q. "In every subject," so in addition to math it
 23 would have been English or all of the subjects offered?
 24 A. Not all, but, you know, the basics: math,
 25 science and -- what do you call it? -- history. You

1 know, just the basics.
 2 Q. And when did this tutoring program take place?
 3 A. I know for a fact that it took place on
 4 Wednesdays, but I don't remember. I think it was twice
 5 a week. I don't know. But I know that it was on a
 6 Wednesday. I went on Wednesdays.
 7 Q. You went on Wednesdays, and it was offered also
 8 another day of the week but you don't remember when?
 9 A. Yeah. Probably other days than two, yeah,
 10 but -- that's my only -- that was my only chance of
 11 going and tutoring.
 12 Q. Was Wednesdays?
 13 A. Yes.
 14 Q. And what time of day is that offered?
 15 A. After school.
 16 Q. How did you learn about it?
 17 A. Through fliers.
 18 Q. Who issued the fliers? Do you know?
 19 A. No, I don't. And announcements.
 20 Q. And when you say "announcements," what
 21 announcements are you referring to?
 22 A. During home room, PA announcements.
 23 Q. And do you know if all students were eligible
 24 to participate in this tutoring after school if they
 25 wished to participate?

1 A. Yes.
 2 Q. And was it offered -- let's see. When did you
 3 first begin going? You said you went in 9th grade, I
 4 believe. When did you start in 9th grade attending
 5 tutoring classes?
 6 A. My teacher advised me. Maybe, like, three
 7 weeks on to the class.
 8 Q. Three weeks into the school year?
 9 A. Yes.
 10 Q. As far as you're aware, it's offered each month
 11 that the school is in session; is that correct?
 12 A. Yes.
 13 Q. Is it still offered today?
 14 A. No. I think there's Saturday tutoring, but I
 15 don't know for a fact. It's on and off. But there's no
 16 everyday tutoring. And peer tutoring isn't an option
 17 anymore.
 18 Q. So let me try and get an understanding. The
 19 program in 9th grade for you was offered the entire
 20 school year; is that correct?
 21 A. Yes.
 22 Q. And at some point that changed?
 23 A. Yes.
 24 Q. When did that change?
 25 A. I think it was after 9th grade that the program

1 began to fall.
 2 Q. So your 10th grade?
 3 A. Yes.
 4 Q. And why is it that you believe it began to
 5 fall?
 6 A. Low attendance.
 7 Q. Okay. So few students were going to the
 8 program?
 9 A. Yes.
 10 Q. And how is it that you know that?
 11 A. I went myself for, like, to check out, look for
 12 my friends, and I didn't see that many people attend.
 13 Q. Okay. And that was your 10th grade year?
 14 A. Yes.
 15 Q. Did you ever talk to anybody about the program
 16 being discontinued or anything of that nature?
 17 A. No. It was -- I didn't talk to, like, one
 18 specific person, but it was brought up, brought up to
 19 our student council.
 20 Q. When?
 21 A. I can't tell you when. I don't know exactly
 22 when.
 23 Q. What year was this?
 24 A. It was probably my 10th grade year. We were
 25 asked to make a peer tutoring program and we did.

1 Q. Okay. So a peer tutoring program began your
 2 10th grade year?
 3 A. Yes.
 4 Q. And how did that -- how was that program
 5 structured?
 6 A. I don't know exactly the structure. I wasn't
 7 part of the committee, but it was a group of students
 8 and teachers advising the program. It was like a -- it
 9 was like a teacher for every student and student as
 10 well, I think. I don't know, actually.
 11 Q. Okay.
 12 A. But it was students.
 13 Q. So from your understanding, you believe that
 14 there were students and teachers involved in the peer
 15 tutoring group that was created, or program, that was
 16 created during your 10th grade year; is that correct?
 17 A. Yes.
 18 Q. And do you know how often the tutoring by the
 19 teachers and students were offered?
 20 A. No.
 21 Q. Do you know when it was offered?
 22 A. I would estimate every day, but I don't know.
 23 It was offered after school.
 24 Q. After school. And you think it might have been
 25 every day, but you're not sure about that?

1 A. Not sure.
 2 Q. And again, you said there was a teacher for
 3 every subject or at least for the core subjects?
 4 A. I think it was ran by -- it was ran by an
 5 advisor, but the students gave tutoring.
 6 Q. I think you testified earlier that there was a
 7 teacher and a student assigned for each subject.
 8 A. Yeah. I told you I wasn't sure if it was that,
 9 but I know for a fact there was an advisor there. There
 10 always has to be a teacher involved in every aspect
 11 that's run by a student.
 12 Q. Okay. Now, that was offered during,
 13 essentially, during your entire 10th grade year; is that
 14 correct?
 15 A. Yes.
 16 Q. And did that program continue?
 17 A. Yeah, it continued on to my 11th grade year.
 18 Q. And then did something happen to that program?
 19 A. Yes.
 20 Q. What happened?
 21 A. There was no elections last year.
 22 Q. No elections?
 23 A. No elections, so no one was elected to do that
 24 program, no student was elected to do that program.
 25 Q. Okay. Are those internal elections within the

1 student government or are those elections for the
 2 school?
 3 A. The school.
 4 Q. And so at that point in 11th grade, when nobody
 5 was elected to --
 6 A. No, that was 12th grade. Continued on to the
 7 11th grade.
 8 Q. Through your entire 11th grade?
 9 A. Yes. And it ended 12th.
 10 Q. Okay. So in 12th grade has there been any
 11 tutoring, that you're aware of, at your school?
 12 A. No, not that I'm aware of.
 13 Q. Have you ever asked anyone if there's any
 14 tutoring available?
 15 A. No. Well, there's the Saturday tutoring.
 16 Q. And when was that program implemented?
 17 A. It was there, to my knowledge, since I was in
 18 the 9th grade.
 19 Q. So it was always offered in addition to these
 20 other tutoring programs you've talked about?
 21 A. It was on and off.
 22 Q. Saturday was always on and off?
 23 A. Not always, but sometimes it would not happen.
 24 Q. Why would it sometimes not happen?
 25 A. If it would fall close to -- what do you call

1 it? -- holiday, they would close off the week before and
2 the week after so that they can get publicity going on
3 again about it.

4 Q. Okay. But other than any times when sessions
5 weren't held because of holidays --

6 A. It was the remaining Saturdays.

7 Q. -- all the remaining Saturdays proceeded
8 regularly?

9 So how often did you attend tutoring in the 9th
10 grade?

11 A. I'd have to say every Wednesday of the first
12 semester.

13 Q. And what math class were you in at the time?

14 A. Algebra.

15 Q. And did you just use tutoring for math?

16 A. Yes.

17 Q. What was your grade for algebra first semester
18 9th grade?

19 A. [REDACTED]

20 Q. And what was your grade for second semester?

21 A. [REDACTED]

22 Q. You explained that you went to tutoring every
23 Wednesday during the first semester. Did you not
24 continue with it every Wednesday during the second
25 semester?

1 A. No.

2 Q. And why is that?

3 A. We had a change of teacher, and because I was
4 playing softball and I wasn't too interested in math.

5 Q. Did you go at all during the second semester?

6 A. I got tutoring from my teacher, but I didn't go
7 to after-school tutoring, nor Saturdays tutoring.

8 Q. During the second semester?

9 A. During the second semester.

10 Q. I'm sorry, did you go to Saturday tutoring
11 during the first semester?

12 A. I did from time to time, but not regularly.

13 Q. So in reviewing 9th grade, first and second
14 semester, do you think that it assisted you to go to
15 tutoring first semester?

16 A. Yes.

17 Q. And you said that your teacher assisted you
18 second semester.

19 A. No, first semester.

20 Q. Oh, did you not -- I thought you said --

21 A. No, second, second semester I didn't go to
22 tutoring.

23 Q. At all?

24 A. Well, I got some from her, but it wasn't like
25 the first semester.

1 Q. That's what I was talking about. You mentioned
2 that you did have some assistance from your teacher.

3 A. Not like I did the first semester.

4 Q. Did you have the same teacher for both
5 semesters?

6 A. No. They switched. That's why. I think
7 different teaching styles. I was used to one and then
8 they changed me for another class.

9 Q. Who was your teacher the second semester?

10 A. [REDACTED]

11 Q. Who was your teacher first semester?

12 A. Miss Sparks.

13 Q. When did you receive assistance from
14 [REDACTED] during the second semester outside of
15 class?

16 A. In. It was inside of class where I got
17 tutoring.

18 Q. Did you ever try and meet with [REDACTED]
19 outside of class?

20 A. She was a very busy person. She got promoted
21 to assistant principal, so she wasn't there every single
22 day of class.

23 Q. In class or outside of class?

24 A. In class. So it was hard to find her and get
25 tutoring from her.

1 Q. Did you ever ask her to tutor you outside of
2 class?

3 A. No. Because I could never really find her
4 outside of class. When she was in class, she was in
5 class and that was your chance.

6 Q. I mean, did you ever ask her while you were in
7 class?

8 A. No. I just took the opportunity to ask her
9 questions right then and there.

10 Q. In class?

11 A. Yes.

12 Q. You still at the time could have gone to
13 tutoring after school and on Saturdays had you made that
14 choice; is that correct?

15 A. Yes.

16 Q. And then after your 9th grade year did you ever
17 participate in any of the after-school or Saturday
18 tutoring again?

19 A. No.

20 Q. Has there ever been a time when you have not
21 been able to attend school for a week period or longer
22 while school was in session?

23 A. No.

24 Q. And have you ever been employed?

25 A. No. Well, yeah, but I didn't get paid with a

- 1 check. It was, like, paper, newspaper thing.
 2 Q. You worked for a newspaper?
 3 A. Yes.
 4 Q. Delivering?
 5 A. No, selling newspapers. Selling subscriptions,
 6 not selling the actual newspaper.
 7 Q. What paper was that?
 8 A. Daily Breeze.
 9 Q. When was that?
 10 A. I was in elementary. I think I was in the 5th
 11 grade. It was a while ago.
 12 Q. And you mentioned that you played softball.
 13 A. Yes.
 14 Q. Is that associated with school?
 15 A. Yes.
 16 Q. Is it the high school team?
 17 A. Yes.
 18 Q. And when have you participated in softball at
 19 Locke High School?
 20 A. All my years in high school. Spring semester.
 21 Q. And when do you need to practice during the
 22 spring semesters?
 23 A. Starting from February the second semester.
 24 Q. Through till the end of the school year?
 25 A. Yeah. Not the end of the school year, but

- 1 through, maybe, May.
 2 Q. What days do you meet?
 3 A. Every day.
 4 Q. Is it after school?
 5 A. No. It's sixth period and after school.
 6 Q. Combined?
 7 A. Yeah. In 9th and 10th grade I was there six
 8 and after school. My 11th and 12th grade year I was
 9 only there after school.
 10 Q. And how late would you stay at practices, on
 11 average?
 12 A. Till five or four.
 13 Q. Any other sports that you participated in while
 14 at Locke High School?
 15 A. Yes.
 16 Q. What?
 17 A. Volleyball and soccer.
 18 Q. So when would you play volleyball?
 19 A. First semester, fall and winter. It was a fall
 20 sport.
 21 Q. And was it the same timing, sixth period and
 22 after school?
 23 A. Same thing. Same thing 10th, 11th and 12th. I
 24 wasn't in it in the 9th grade.
 25 Q. So for 10th through 12th grade?

- 1 A. It was the same routine for softball, except I
 2 began playing volleyball in the 10th grade.
 3 Q. And then you said soccer. When did you
 4 participate in soccer?
 5 A. Winter of my 11th grade year.
 6 Q. So during the 11th grade you played volleyball,
 7 soccer and softball?
 8 A. Yes.
 9 Q. How were you able to fit -- explain to me. How
 10 did that work? When did you fit in soccer?
 11 A. When did I fit in soccer?
 12 Q. Yes.
 13 A. I don't know. I was just able to fit it in.
 14 It was a little hard to juggle.
 15 Q. I'm sorry, is that an after-school sport as
 16 well?
 17 A. Yeah, they're all after school.
 18 Q. So there's overlap?
 19 A. No. Well, let me explain to you.
 20 Q. Okay.
 21 A. It wasn't an overlap in the 9th and 10th grade
 22 because you have to have two years of PE, so they were
 23 sixth period and after school. In the 10th -- I mean,
 24 in the 11th and 12th grade it did overlap a little with
 25 my fifth and sixth period classes because for game days

- 1 we'd leave during fifth, if the game's away. If the
 2 game's at home, we can usually go to fifth, to half of
 3 fifth, and then leave to the field.
 4 Q. Game day is once a week; right?
 5 A. No, twice a week.
 6 Q. But I just want to -- from what month to what
 7 month did you play soccer?
 8 A. Soccer was from November through early --
 9 through late January, early February.
 10 Q. You played that 9th through 12th, you said?
 11 A. No. I only played that last year.
 12 Q. Soccer was just your 11th grade year?
 13 A. Maybe this year, but I don't know.
 14 Q. All right. Any other sports or activities that
 15 you're involved in while at Locke High School outside of
 16 school hours?
 17 A. Student council.
 18 Q. When would you participate in student council?
 19 A. Fourth period, during school, and sometimes it
 20 would take after school, before school hours.
 21 Q. And what years did you participate in student
 22 council?
 23 A. 9th through this year, the 12th.
 24 Q. How often were you required or would you come
 25 in either after school or before school for student

1 council?

2 A. About, maybe, an hour before school and two
3 hours after school.

4 Q. And how often would you do that?

5 A. I'd say every day. We had to have community
6 service and school service hours.

7 Q. So pretty much every day from 9th grade to 12th
8 grade you've gone in?

9 A. That was optional. I only had to do 30 hours
10 for school hours and community hours, but I did more
11 because I was an officer.

12 Q. So would you generally consider -- you had
13 sports after school. Would you generally do this after
14 school?

15 A. Yeah.

16 Q. So pretty much --

17 A. And they knew I was doing sports, so they would
18 excuse me if I couldn't attend after school.

19 Q. I want to make sure I understand. So pretty
20 much before school of your 9th through 11th you would go
21 in approximately an hour before school for student
22 council issues?

23 A. And do work.

24 Q. What do you mean "do work"?

25 A. Posters, fliers.

1 elections, but that's what we were going to do, to have
2 special elections for not having elections last year.

3 Q. Make sure I understand. There was no May 2001
4 election and so to make up for that you had scheduled to
5 have an election 2001, but there was a delay in getting
6 the student council class together, so those elections
7 didn't take place; is that correct?

8 A. Yes, uh-huh. So therefore we had interim
9 officers.

10 Q. Okay. And why was there a delay in getting the
11 2001 -- fall 2001 student council class together?

12 A. There was really no teacher who wanted to do
13 it.

14 Q. How do you know that?

15 A. They told -- since I was supposed to be the
16 president, I was supposed to run for president, teachers
17 would come up to me, knowing that I care so much about
18 the school, and tell me that, go seek for an advisor.
19 And they would tell me it's slow. And I would contact
20 the principal and ask her how it was going, and she
21 would tell me, well, nobody really wants to do it. You
22 want to go talk to some teachers that you think will be
23 good candidates and try to convince them, and I would do
24 that. That's how I know.

25 Q. And eventually did you find a teacher who

1 Q. Work for student council?

2 A. Yes.

3 Q. And why not during your 12th grade year?

4 A. We didn't have elections, so the year's kind of
5 slow. Student council, there's only, like, three
6 members.

7 Q. Okay. Now, I've been meaning to ask you this.
8 What do you mean you didn't have elections?

9 A. The principal last year, [REDACTED] said that we
10 weren't prepared to have an election because she said
11 that our students weren't qualified to run. They didn't
12 have the GPA and stuff. They did, but for some reason
13 she didn't want to hold the elections, she didn't want
14 to have the elections. We were supposed to have the
15 elections in September, but there was a delay in getting
16 the student council -- the leadership slash student
17 council together, so for three weeks in the year 2000,
18 2001 school year we didn't have student council, so
19 therefore we couldn't have elections in September.

20 Q. And you're talking about elections of 2000 or
21 2001?

22 A. Elections take place for the following year in
23 May.

24 Q. So there is no September election?

25 A. No. There's not supposed to be September

1 wanted to?

2 A. Yes.

3 Q. And who was that?

4 A. Mr. Porter.

5 Q. And so at what point in time did you get
6 Mr. Porter to come and sponsor your student council?

7 A. Let's see. School started in -- I'd say about
8 October, maybe. Late September, early October.

9 Q. Student council meets during a period of the
10 day?

11 A. Yes.

12 Q. What period?

13 A. Fourth period.

14 Q. And what did you do for fourth period in
15 September?

16 A. I had a regular class. I had an algebra --
17 wait. No, I had math analysis. It was the only period
18 that was offered and the only teacher that offered it,
19 so that was my next -- that was my next that I -- once
20 they got a teacher for student council, I had to make a
21 choice between math analysis and leadership, and I chose
22 leadership.

23 Q. And you dropped math analysis?

24 A. I dropped math analysis.

25 Q. So are you taking a math class this year?

1 A. No.
 2 Q. Do you have all your math requirements to
 3 graduate?
 4 A. Yes.
 5 Q. Are you going to have any elections?
 6 A. We're supposed to second semester, around
 7 February, and hopefully it comes through. But I'm the
 8 interim president.
 9 Q. How many students in your student council class
 10 for the fall of 2001?
 11 A. I'd say about 20 to 25.
 12 Q. So those 20 to 25 students were initially
 13 enrolled in some other class during fourth period and
 14 then dropped to join student council?
 15 A. Yeah. Most of them were in the math analysis
 16 class. Since the class had, like, 50, 60 students, they
 17 were pretty much kicked out of that class and thrown
 18 into student council.
 19 Q. That wasn't your situation, you chose to be in
 20 student council?
 21 A. Yeah, I chose into student council, but I was
 22 going to get kicked out of that class until I talked to
 23 the assistant principal and I told her that 12th graders
 24 should have the option of staying in that class, should,
 25 you know, receive preference because of the fact that

1 they're graduating and some of them might need that and
 2 are college bound.
 3 Q. We'll talk about some of your classes and the
 4 size of your classes a little bit later.
 5 A. Okay.
 6 MS. STRONG: Why don't we take our lunch break
 7 right now. It's 12:15 and we're at a good stopping
 8 point. Let's go off the record.
 9 (Lunch recess.)
 10 ///
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1 LOS ANGELES, CALIFORNIA; SATURDAY, DECEMBER 29, 2001
 2 1:15 P.M.
 3
 4
 5 EXAMINATION (continued)
 6
 7 BY MS. STRONG:
 8 Q. Back on the record.
 9 A. I would like to make a correction.
 10 Q. Sure.
 11 A. Remember when I said about -- what do you call?
 12 When I talked about what me and my -- about what we
 13 prepared, documents we prepared. I'd like to change
 14 where I said -- let me think. Where I said that she
 15 read something to me, it was something else.
 16 Q. It was something else?
 17 A. Yes. I'd like to change that, get it off the
 18 record; can we do that?
 19 Q. Is this something about that incident --
 20 A. I made a mistake.
 21 Q. Tell me what your mistake was and we'll make
 22 sure the record is clear.
 23 A. She didn't read my any declarations, and I --
 24 Q. What did she read you?
 25 A. She read something else. It was just a quote.

1 Q. A quote from what?
 2 MS. TEITELBAUM: You can tell her what it was
 3 from.
 4 THE WITNESS: It was from the transcript.
 5 BY MS. STRONG:
 6 Q. Do you know what transcript it was being quoted
 7 from?
 8 A. No. I just know that she read that to me as an
 9 example.
 10 Q. But it wasn't from a declaration?
 11 A. No, it wasn't from a declaration.
 12 Q. Do you know what it was from?
 13 A. From a transcript, deposition.
 14 Q. A deposition transcript?
 15 A. Yes.
 16 Q. Okay. And do you remember what the statement
 17 was regarding?
 18 A. No.
 19 MS. TEITELBAUM: I'm going to instruct you not
 20 to answer that question even if you did remember.
 21 MS. STRONG: Okay.
 22 Q. Are you going to follow your attorney's
 23 instruction?
 24 A. Yes.
 25 Q. Okay. Now that we're back from lunch, I want

1 to remind you that you're still under oath.
 2 A. Yes.
 3 Q. Have you had any substance or any medication
 4 that would cloud your mind or affect your ability to
 5 continue giving your best testimony here today?
 6 A. No.
 7 Q. And do you remember the ground rules that we
 8 went over this morning?
 9 A. Yes.
 10 Q. Do you have any questions about any of those
 11 ground rules or anything before we proceed?
 12 A. No.
 13 Q. Can you tell me what the schedule is at Locke?
 14 Is it a semester schedule, quarter schedule?
 15 A. It's a semester.
 16 Q. And it's not a multi-track school; correct?
 17 A. No.
 18 Q. Are there any special programs at Locke, for
 19 example, like a magnet program?
 20 A. Not a magnet program, but there's a
 21 transportation academy. There's academies.
 22 Q. Okay. What are the academies?
 23 A. Transportation Careers Academy.
 24 Q. Okay.
 25 A. I think there's Shell.

1 Q. I'm sorry?
 2 A. Shell youth program. I don't know exactly what
 3 it's called, but Shell program.
 4 Q. A Shell program?
 5 A. Uh-huh.
 6 Q. Is that S H --
 7 A. Like the gas station.
 8 Q. Anything else?
 9 A. No, not that I can think of.
 10 Q. And the Transportation Careers Academy, are you
 11 involved in that academy?
 12 A. Yes.
 13 Q. And what does that mean, to be a Transportation
 14 Careers Academy?
 15 A. We're able to have jobs with the MTA, get jobs,
 16 internships with the MTA.
 17 Q. What types of internships?
 18 A. I don't know because I never participated, but
 19 we have the opportunity to do so, and we work with
 20 computers and technology and stuff like that.
 21 Q. Is it set up like a magnet, the academy?
 22 A. We do get preference over other students. We
 23 get AP classes before anyone does, and honors classes.
 24 Q. Okay. But are there classes designated as
 25 Transportation Careers Academy classes?

1 A. Yes, uh-huh.
 2 Q. And are those one and the same as the honors
 3 classes and AP classes or are they separate from those?
 4 A. The academy has its own teachers and its own
 5 classes, so its honors programs would be with the
 6 teachers that are within the program.
 7 Q. Within the academy?
 8 A. Within the academy.
 9 Q. And are the AP classes, then, academy classes?
 10 A. Some of them are.
 11 Q. And some are not?
 12 A. And some are not. If there's not enough -- not
 13 all the teachers are from the Transportation Careers
 14 Academy and not all have -- what's it called? Not all
 15 are part of the program. So if there's environmental
 16 science and that teacher's not part of the program, you
 17 could still take it as a person from that academy, a
 18 student from that academy.
 19 Q. So academy students can take regular classes,
 20 for lack of a better term?
 21 A. Yeah, they can take regular classes.
 22 Q. And when did you first enroll in the
 23 Transportation Careers Academy?
 24 A. I was placed in it by my counselor in the 9th
 25 grade.

1 Q. So your counselor at Locke placed you in it?
 2 A. Yes.
 3 Q. So you arrived at the school and you were not
 4 in the academy because it's your local school and then
 5 you were identified and placed in the academy?
 6 A. Yes. For my grades, because of my grades.
 7 Q. At what point did your counselor identify you
 8 and place you in the academy?
 9 A. Right off. The first day that I enrolled at
 10 Locke, he went over my transcripts and gave me my
 11 classes and placed me in the academy.
 12 Q. Okay. And so was your grades based on your
 13 junior high school classes?
 14 A. Yes.
 15 Q. And then you've participated in the academy
 16 through to your senior year; is that correct?
 17 A. Yes.
 18 Q. Now, the Shell program -- well, first, one
 19 other question with respect to the Transportation
 20 Careers Academy. Do you have the same schedule as
 21 students not in the academy?
 22 A. Most of my schedule is with other members of
 23 the Transportation Careers Academy. There is, of
 24 course, some classes that other regular students can
 25 take.

1 Q. I'm sorry, I wasn't very clear with that
2 question.
3 Is your school schedule, in other words the
4 days that you go to school and the times you're in
5 school, the same as students not in the academy?
6 A. We all have the same schedule.
7 Q. But your classes will differ?
8 A. Yeah.
9 Q. The Shell program, what is that?
10 A. I don't know about it. I heard about it and
11 there's classmates that are in it.
12 Q. Is it the equivalent of an academy?
13 A. Yeah, it's pretty much like an academy. They
14 provide jobs with Shell.
15 Q. And are there teachers that are part of the
16 Shell program only, similar to the teachers that are in
17 the Transportation Careers Academy program?
18 A. No, that's the difference between most of the
19 academies, is that the Transportation Careers Academy is
20 funded by the MTA. So the stuff we get is funded by the
21 MTA, and the other, the Shell, doesn't get funded by
22 them. So teachers aren't different from -- there aren't
23 specific teachers.
24 Q. There aren't special teachers for the Shell
25 program?

1 either program?
2 A. Yes.
3 Q. You mentioned earlier that [REDACTED] was the
4 principal of your school.
5 A. Yes.
6 Q. Was she the principal when you arrived there in
7 9th grade?
8 A. Yes.
9 Q. And did you know her while she was at your
10 school?
11 A. Yeah.
12 Q. And when did you first meet her?
13 A. I met her in my 9th grade.
14 Q. And how often did you interact with her?
15 A. I'd say about once or twice a month.
16 Q. Why would you interact with her once or twice a
17 month?
18 A. I was the representative from student council
19 at the SBMC meetings, School Based Management Council
20 meetings. That's the whole name.
21 Q. Starting in 9th grade?
22 A. Yeah.
23 Q. And how long did you hold that position?
24 A. Well, I was the alternate, so I was
25 representing student council. And whenever the

1 A. Yes.
2 Q. And you think that's because of the funding?
3 A. I think so. I don't know, actually.
4 Q. What do you base that on?
5 A. Well, the Shell academy doesn't really fund, so
6 I would think that, you know, they don't pay their own
7 teachers.
8 Q. You mentioned that you believe that the MTA
9 funds the Transportation Careers Academy. Why is it you
10 believe the MTA funds the academy?
11 A. They give us computers, and if we ever need
12 buses for field trips or something, they give us buses.
13 Q. Do you know if they pay for your teachers?
14 A. No, I don't think they pay for my teachers.
15 They're just placed -- I don't know.
16 Q. And could you participate in the Shell program
17 being a member of the Transportation Careers Academy?
18 A. I think you could, but your two programs would
19 interfere because you would have to change to another
20 counselor, so I guess not, you can't do that.
21 Q. So there's one counselor for students in the
22 Transportation Careers Academy and a distinct counselor
23 for the Shell program?
24 A. Yes.
25 Q. And two distinct counselors for students not in

1 president couldn't go, I would go. So I -- for most of
2 my years presidents weren't able to go, so I went for
3 three years, except for this year. It's all messed up.
4 I haven't been going --
5 Q. So 9th grade through 11th grade you would go to
6 SBMC meetings?
7 A. Yes.
8 Q. Did you interact with your principal on any
9 other occasion other than at those meetings?
10 A. Yeah, during homecoming. I knew more than my
11 new advisor. I would have a new advisor every year, so
12 I would know a little more than them, and I would talk
13 to her about permits and stuff like that.
14 Q. For homecoming?
15 A. Yeah, for homecoming.
16 Q. Permits for?
17 A. From the city to have the parade and -- to have
18 the parade and a freeway route so that we can get the
19 parade for free.
20 Q. And how did you learn about that?
21 A. I learned from our advisor, from the first
22 advisor that left.
23 Q. During your 9th grade?
24 A. During my 9th grade year.
25 Q. And you got a new advisor during the 10th grade

1 year?

2 A. During my 9th grade year, the second -- halfway
3 through the first semester I got a new advisor.

4 Q. Just so I understand, is advisor the same as
5 counselor?

6 A. They're like your teacher.

7 Q. For student council?

8 A. Yeah, but they call them advisors.

9 Q. So different from your counselor?

10 A. Different from your counselor.

11 Q. So you would speak with your principal at times
12 regarding permits and details regarding homecoming. Is
13 there any other time when you recall interacting with
14 the principal other than what you've already identified?

15 A. Student council stuff.

16 Q. So on a regular basis for student council
17 members?

18 A. Yeah. I had a close relationship with her.

19 Q. You did?

20 A. Yes.

21 Q. Did you interact with her socially?

22 A. Yes, at football games.

23 Q. At football games?

24 A. Yes.

25 Q. Ever off campus?

1 Q. So the marque is outside the school so parents
2 can see it if they drop their children off or drive by?

3 A. Yes.

4 Q. Were there any fliers with respect to these
5 meetings?

6 A. Only if there was a huge meeting that would
7 require parents and community members to vote.

8 Q. Okay. If there's ever a vote they would send
9 home fliers with the students; is that correct?

10 A. No, not with the students, but they would,
11 like, parents would -- I mean, the administrators would
12 fan out and give it to whatever parents they could find.

13 Q. On school grounds?

14 A. They were never really sent home with the
15 students.

16 Q. Do you know if any of these fliers were ever
17 mailed to the parents?

18 A. I don't think so. I opened up my mom's mail.

19 Q. And so the meetings, you said, were twice a
20 month; is that correct?

21 A. I'm not sure if it's -- once or twice a month,
22 I would say, I would estimate.

23 Q. And could parents come to these meetings or
24 students come to these meetings and raise any issues
25 that they'd like to at the meetings? Is that correct?

1 A. One night when we were -- it was homecoming
2 night. Not homecoming night, the game before homecoming
3 where we had to do some more paperwork, and it was after
4 school hours, and she had to take me home.



10 Q. This SBMC or the SBMC meetings, can you tell me
11 about them? What were they for?

12 A. They had different commitments: school
13 improvement, bylaws, technology, things like that. It
14 was like the structure of how the school was ran, so
15 administrators, teachers, students and parents had
16 access to that meeting.

17 Q. Were they announced in any way?

18 A. Yeah.

19 Q. How were they announced?

20 A. They were announced, I think, by -- you know,
21 on the announcements.

22 Q. On the PA?

23 A. On the marque.

24 Q. On the PA and the marque?

25 A. Yeah.

1 A. Yeah.

2 Q. Do you know if any of the issues that you
3 believe relate to this lawsuit were ever addressed
4 during any of the SBMC meetings?

5 MS. TEITELBAUM: Objection. Calls for
6 speculation. She hasn't testified she attended them
7 all.

8 BY MS. STRONG:

9 Q. Go ahead.

10 A. I was never there when it was heated. I was
11 never there when it got heated, so I -- and I don't
12 remember exactly what happened. I didn't go too much by
13 11th grade year. I went a lot in my 9th grade. At the
14 times when I was there it wasn't so heated, so I can't
15 answer that question because I don't know.

16 Q. Okay. Well, I'm going to break this down a
17 little bit.

18 Your 9th grade year how many meetings would you
19 say you attended over the entire year?

20 A. How many months are there in a school year?

21 Q. Approximately nine; is that correct?

22 A. Yeah, there's 10, 10 months. I'd say about 20
23 in my 9th grade. I attended all of them.

24 Q. And during your 10th grade year how many of
25 those meetings did you attend, approximately?

1 A. Approximately 15.
 2 Q. And your junior year or your 11th grade year,
 3 approximately how many did you attend?
 4 A. I'd say about 10.
 5 Q. Okay. And so during the meetings that you
 6 attended, do you ever remember anyone raising or
 7 discussing any of the issues that you believe are
 8 addressed in this lawsuit?
 9 A. They talked about books and how they never got
 10 to where they were supposed to and how they took so long
 11 to finally get dispersed.
 12 Q. Any other issues you recall being discussed at
 13 any of those meetings that you believe relate to this
 14 lawsuit?
 15 A. No. No, just books was always a big issue with
 16 us.
 17 Q. I'm just going to run through a couple issues
 18 and ask you specifically. For example, do you recall
 19 ever hearing anyone discuss bathrooms at any of those
 20 meetings?
 21 A. Yes.
 22 Q. Do you recall anyone ever discussing
 23 credentialed or non-credentialed teachers at those
 24 meetings?
 25 A. No.

1 Q. Do you recall anyone ever discussing the number
 2 of students in classes at those schools -- at those
 3 meetings?
 4 A. Overcrowdedness?
 5 Q. Yes.
 6 A. Yeah, a few occasions.
 7 Q. Now that we've kind of run through examples,
 8 can you think of anything else that was discussed, any
 9 other issues that were discussed at any of those
 10 meetings that relate to any of the issues in this
 11 lawsuit?
 12 A. No, that's pretty much about it, to my
 13 recollection.
 14 Q. Okay. And in terms of individuals present, you
 15 said administrators have access to those meetings. What
 16 administrators would go to those meetings?
 17 A. Assistant principals. Principal would run the
 18 meeting. That's it. We only had assistant principals
 19 and principals.
 20 Q. And you said teachers have access to the
 21 meeting.
 22 A. Yes.
 23 Q. Would teachers ever go?
 24 A. Yeah. Teachers were also -- it was like a
 25 student council. People were elected to committees and

1 to be chairs of those committees, and some teachers,
 2 that was their job, chairs, to be chairs of the
 3 committees.
 4 Q. Okay. So they would go?
 5 A. Yeah.
 6 Q. Okay. And whatever -- would teachers ever go
 7 who weren't chairs of any committees?
 8 A. Yes, you could go if you weren't chairs.
 9 Q. Did parents ever go to these meetings?
 10 A. Not so many parents, but there was a parent
 11 representative sitting around the table.
 12 Q. And how about students?
 13 A. There wasn't that many. There was a student,
 14 me, representing, at the table.
 15 Q. But in terms of your interactions with [REDACTED]
 16 [REDACTED] was your relationship such that you could have
 17 conversations or find her, communicate with her when you
 18 wanted to?
 19 A. Yeah, I was able to do that.
 20 Q. There wasn't a time when you tried to get in
 21 touch with her and you couldn't get in touch with her
 22 for long periods of time or anything like that?
 23 A. There was times when she was at meetings and
 24 unavailable and you couldn't get to her.
 25 Q. That moment. But was there ever, you know,

1 long periods of time, more than a week or so, where you
 2 couldn't get in touch with her when you really wanted
 3 to?
 4 A. Yeah, when she would go to big meetings and
 5 conferences, I guess, you wouldn't be able to talk to
 6 her, but that was just my case.
 7 Q. I'm just asking you about your personal
 8 experience.
 9 Can you recall any time when you really needed
 10 to get in touch with her and you weren't able to?
 11 A. Yeah.
 12 Q. Can you tell me about that?
 13 A. I live right across the street and my mom saw
 14 kids tagging up a hall, and my mom wanted to speak to
 15 the principal. And one of the assistant principals told
 16 her that she was busy, and my mom saw her walking around
 17 doing nothing.
 18 Q. The principal?
 19 A. Yeah, the principal.
 20 And that's the time that I -- where, like, she
 21 didn't want to give us the time of the day.
 22 Q. Did you try and get in touch with the
 23 principal?
 24 A. Yeah. I was with my mom, and she wouldn't --
 25 she wouldn't want to see her.

1 Q. How do you know she didn't want to see you?
 2 A. Because the -- my mom was with the assistant
 3 principal, and I was waiting for her in the main office,
 4 and she was walking around with them. She said that she
 5 heard him -- she was right by his side and she heard him
 6 ask, ask the principal, that my mom wanted to speak to
 7 her, but she said she was busy. But she was walking
 8 around, like, the main office.
 9 Q. Do you know what she was doing?
 10 A. No.
 11 Q. Did you then try and meet with her some time
 12 thereafter?
 13 A. Yes. It was another -- it was a big meeting to
 14 talk to her about that.
 15 Q. Oh, okay. With respect to that one issue?
 16 A. That one issue.
 17 Q. I was trying to follow up on that one issue.
 18 And when were you next able to talk to her?
 19 A. I didn't talk to her about that one issue. The
 20 month went by and I forgot about it, so I didn't talk to
 21 her about it.
 22 Q. Did you try and see her the next day after the
 23 day that you were there with your mother?
 24 A. No. But I did try to look for her and talk to
 25 her about it. Not right the next day, but I did try to

1 set up a meeting with her.
 2 Q. When was that?
 3 A. This is last year.
 4 Q. But how much after the incident did you try and
 5 set up a meeting with her?
 6 A. A week.
 7 Q. And what happened?
 8 A. That's the time where, like, she wasn't there
 9 because they said she was in a big meeting, in a
 10 conference or something.
 11 Q. And did you make any arrangements to speak with
 12 her when she returned from the conference?
 13 A. No.
 14 Q. Did you try to make any arrangements in that
 15 regard?
 16 A. No.
 17 Q. But you would still interact with her on a
 18 regular basis; is that correct?
 19 A. Yes. But the subject just wouldn't come up.
 20 Q. You wouldn't raise them with her?
 21 A. No.
 22 Q. Can you think of any other time when you wanted
 23 to speak with the principal and you couldn't for some
 24 reason?
 25 A. Yeah, that time when, the beginning of the

1 school year, where they wanted to kick out students from
 2 the math analysis class, and they were mostly seniors.
 3 Q. Is the beginning of the school year 2001?
 4 A. Yes. And I wanted to speak to her, but they
 5 sent us to the assistant principal's office. And then I
 6 spoke to her, the assistant principal. I asked to speak
 7 to the principal.
 8 Q. And you were directed to the assistant
 9 principal who you were then able to speak with?
 10 A. Yeah.
 11 Q. Did you ever try and raise that issue with the
 12 principal at some time after that?
 13 A. No. Because it was fixed with the assistant
 14 principal. I told her what happened, and she gave
 15 preference to seniors.
 16 Q. Oh, okay. Any other time when you recall
 17 wanting to talk to the principal but you were unable to
 18 for some reason?
 19 A. No.
 20 MS. STRONG: Can we take a quick break?
 21 (Brief recess.)
 22 BY MS. STRONG:
 23 Q. You mentioned that there are also assistant
 24 principals at Locke.
 25 A. Yes.

1 Q. Can you identify for me the assistant
 2 principals? Let's start when you were in 9th grade.
 3 A. They changed.
 4 Q. Why don't we start with 9th grade. Can you
 5 tell me who the assistant principals were when you
 6 started school in 9th grade?
 7 A. Uh-huh. Mr. Bauer was one of the assistant
 8 principals, Ms. McGee. She has a weird spelling, so I'm
 9 not going to even mess with it.
 10 Q. So Ms. McGee?
 11 A. And Ms. Burns.
 12 Q. Anyone else?
 13 A. And Mr. Russell.
 14 Q. And do you happen to know what their
 15 responsibilities -- I know that there's some assistant
 16 principals for certain issues and some for others.
 17 A. No, I don't know their exact title.
 18 Q. Do you know what any of them -- do you know,
 19 for example, what Mr. Bauer was responsible for?
 20 A. Attendance.
 21 Q. And how about Ms. McGee?
 22 A. Ms. McGee, she changed her position so much.
 23 No, I don't know.
 24 Q. And Miss Burns?
 25 A. She was secondary to [REDACTED] so I don't know

1 what she did.
 2 Q. And Mr. Russell?
 3 A. Mr. Russell I don't know either.
 4 Q. Okay. And at any time did any of those
 5 individuals leave the school?
 6 A. Yeah.
 7 Q. Okay. Why don't we start with Mr. Bauer.
 8 A. Mr. Bauer left.
 9 Q. When did Mr. Bauer leave?
 10 A. I'm not sure whether the second semester of my
 11 9th grade or first semester of my 10th grade. I'm not
 12 sure when he left.
 13 Q. Do you know who replaced him?
 14 A. Ms. Spain.
 15 Q. As in the country?
 16 A. Yes. Miss Atlas, then Miss Atlas was replaced
 17 by Ms. Spain.
 18 Q. So how long was Miss Atlas there for?
 19 A. Two months.
 20 Q. And then Miss Spain?
 21 A. Then Miss Spain.
 22 Q. And has Miss Spain been there for the remainder
 23 of your time?
 24 A. Yes. She's the only assistant principal that's
 25 still there.

1 Q. Miss McGee is, I assume, no longer there, then.
 2 A. No.
 3 Q. When did Miss McGee leave?
 4 A. Miss McGee left this year. Let me give you a
 5 list of my 11th grade --
 6 Q. Let me follow through. Miss McGee left this
 7 year, you said, your senior year?
 8 A. Yes.
 9 Q. And who has replaced --
 10 A. She hasn't been replaced.
 11 Q. Do you know when she left this year?
 12 A. Somewhere along November.
 13 Q. Approximately November 2001?
 14 A. Yes.
 15 Q. Do you know why she left?
 16 A. No.
 17 Q. Okay. Miss Burns, did she leave as well?
 18 A. I don't know.
 19 Q. You don't know one way or the other whether
 20 she's there or not?
 21 A. No, I don't.
 22 Q. How about Mr. Russell?
 23 A. He's been gone.
 24 Q. When did Mr. Russell leave?
 25 A. Last year.

1 Q. So during your 11th grade year?
 2 A. He retired.
 3 Q. First semester, second semester?
 4 A. He retired at the end of my 10th grade year, so
 5 he wasn't there my 11th grade year.
 6 Q. Okay. And do you know if Mr. Russell was
 7 replaced?
 8 A. He was replaced by mister -- no, no, I don't
 9 know who replaced him.
 10 Q. Okay. So now who are the assistant principals?
 11 A. 11th or now? Now there's only -- Ms. Spain's
 12 the only one left now. And I'm not sure about Ms. Burns
 13 still being there.
 14 Q. You said you don't know who replaced
 15 Mr. Russell?
 16 A. No, I don't know who replaced him.
 17 Q. So someone could have replaced him and you
 18 maybe haven't met him or her?
 19 A. I don't know their specific, like, their
 20 offices. I couldn't tell you who replaced who.
 21 Q. The only assistant principal you know about
 22 right now is Ms. Spain, but there could be others you
 23 don't know about?
 24 A. The ones that left have been replaced.
 25 Ms. Burns has been there since my 9th grade year and I

1 don't know whether she's still at Locke.
 2 Q. I thought you said you don't know whether or
 3 not, one way or the other, whether anyone replaced
 4 Mr. Russell.
 5 A. I don't know about him, who replaced him.
 6 There's another assistant principal that came along, but
 7 he's not doing the same job as Mr. Russell was doing.
 8 Q. Who's that?
 9 A. That's Mr. Perea. That's why I would rather
 10 give you the 11th grade year.
 11 Q. What's the 11th grade list?
 12 A. Ms. Burns, Ms. McGee, Ms. Spain and Mr. Perea,
 13 [REDACTED] So either Mr. Perea or
 14 [REDACTED] took his role, but I'm not sure who did.
 15 Q. You said this is in the 11th grade.
 16 A. Uh-huh.
 17 Q. So is [REDACTED] still there?
 18 A. No, he left before the break.
 19 Q. Before your winter break?
 20 A. Uh-huh.
 21 Q. In 2001?
 22 A. Yeah.
 23 Q. Do you know why he left?
 24 A. No, I don't.
 25 Q. So he was here during your senior year and just

1 recently left?
 2 A. Yes.
 3 Q. And you don't know one way or the other whether
 4 there's going to be somebody at the school upon
 5 returning from break that would have replaced him?
 6 A. No, I don't know.
 7 Q. Ms. Burns you don't know one way or the other?
 8 A. No, I don't.
 9 Q. Ms. McGee just left in November of 2001?
 10 A. Yes.
 11 Q. And you don't know one way or the other whether
 12 she'll be replaced when you return to school --
 13 A. No, I don't.
 14 Q. -- after the winter break?
 15 Ms. Spain is still there?
 16 A. Ms. Spain is still there.
 17 Q. And Mr. Perea's still there?
 18 A. No, he's not.
 19 Q. Okay. When did Mr. Perea leave?
 20 A. I don't know when he left. I just stopped
 21 seeing him, but I don't --
 22 Q. But do you know that he left in fact?
 23 A. Yeah, he left.
 24 Q. How do you know he left?
 25 A. My counselor told me.

1 Q. When did your counselor tell you?
 2 A. Before we went on the break, the last week
 3 before we went on Christmas break.
 4 Q. In 2001?
 5 MS. TEITELBAUM: Just to clarify, that's when
 6 your counselor told you or that's when she told you he
 7 left?
 8 THE WITNESS: That's when she told me that
 9 Mr. Perea left.
 10 BY MS. STRONG:
 11 Q. But you don't know when Mr. Perea actually
 12 left?
 13 A. No. No, I don't.
 14 Q. And you don't know one way or the other whether
 15 he will be replaced by the time you get back to school
 16 after the break?
 17 A. No.
 18 Q. You mentioned several people here who have been
 19 assistant principals during your time at Locke High
 20 School. Did you have regular interactions with any of
 21 them?
 22 A. Yes.
 23 Q. Who?
 24 A. Ms. Spain, Ms. Atlas, Mr. Perea, Ms. McGee.
 25 Who else is on there? Mr. Russell. I had pretty much

1 with all of them, except for Burns. I didn't talk to
 2 her that much. I did encounter her on a few occasions,
 3 but I didn't talk to her.
 4 Q. And why did you have regular interactions with
 5 all of them?
 6 A. Student council stuff. They had to sign off
 7 some stuff. And I had to give them propositions to have
 8 a dance, have canned food drive, and they would sign it
 9 off and sponsor it.
 10 Q. Okay. Then is it fair to say you personally
 11 could interact with these individuals when you wanted
 12 to; is that correct?
 13 A. Yes. They were available more than the
 14 principal.
 15 Q. Was there ever a time that you can specifically
 16 recall where you wanted to get in touch with one of them
 17 and couldn't for some reason?
 18 A. Yes. Actually, I recall one incident that has
 19 to do with [REDACTED] also and Ms. McGee. One of our
 20 games was canceled. One of our volleyball games was
 21 canceled because none of our students had purchased --
 22 none of our team members had purchased an activity card.
 23 And I tried to talk to [REDACTED] and she refused to talk
 24 to anyone about that matter. And I wanted to talk to
 25 Ms. Spain, and Ms. Spain also -- Ms. McGee and she also

1 refused. So they sent Ms. Spain to give us that message
 2 because both of them refused to talk to any of the
 3 coaches or teammates.
 4 Q. What year was this?
 5 A. This was this year, 2001.
 6 Q. So your senior year?
 7 A. Senior year.
 8 Q. Before I ask you some more details about that
 9 incident, can you think of any other time when you
 10 wanted to talk to any of these assistant principals and
 11 you couldn't for some reason?
 12 A. No.
 13 Q. Okay. With respect to the volleyball incident
 14 during your senior year, how is it that you know that
 15 the principal, [REDACTED] did not want to speak with
 16 anybody about the incident?
 17 A. I went up to her office, and she told her
 18 secretary that she didn't want to talk to anyone.
 19 Q. And how do you know that?
 20 A. Because the secretary is a good friend of mine,
 21 too, and she said that she didn't really want to talk to
 22 anyone at the time.
 23 Q. Do you know why?
 24 A. No, I don't.
 25 Q. And what month was this? You said this was

1 this year, but what month?
 2 A. This was this year, around, maybe, September.
 3 September through -- I don't know exact -- an exact
 4 date. Maybe September and maybe October.
 5 Q. Okay. September or October.
 6 Was it the beginning of the volleyball season?
 7 A. Yes.
 8 Q. Was it the first game?
 9 A. No. It was the mid --
 10 Q. Middle of the volleyball season?
 11 A. Yeah.
 12 Q. So what happened next after you tried to talk
 13 with [REDACTED] and were unable to?
 14 A. I talked to Ms. -- I tried to talk to
 15 Ms. McGee.
 16 Q. Okay. And what happened?
 17 A. She told me in my face that she didn't want to
 18 talk about that; that there was nothing to talk about.
 19 Q. And what did you tell her the problem was?
 20 A. Well, they never told us that we had to provide
 21 the activity cards, and our problem was that we refused
 22 to buy the activity cards because the football players
 23 were allowed to play games and none of their games were
 24 canceled because they didn't buy the activity cards.
 25 Q. What is an activity card?

1 A. It's something that they make athletes and are
 2 trying to implement at school so that they can buy -- so
 3 it can pay off buses and have -- they say fundraisers.
 4 To have activities in our school, which I never -- I
 5 never seen that, those fruits of that money go to
 6 anything by being a student council member. I see the
 7 budget and stuff like that, and I've never seen any
 8 fruits of that money.
 9 Q. Were you required to purchase activity cards
 10 during your 9th through 11th grade years at the school?
 11 A. Not my 9th grade year, but 10th, 11th and 12th.
 12 Q. And when do you have to purchase the activity
 13 card?
 14 A. The beginning of the year. Before your first
 15 game you're supposed to -- everyone on the team is
 16 supposed to have their activity card. It doesn't always
 17 happen, but they eventually make you buy the activity
 18 card, or if not they threaten to cancel your game.
 19 Q. And is one activity card good the entire year
 20 of sports?
 21 A. Yeah.
 22 Q. No matter what sport you play on?
 23 A. Throughout the whole school year. They want
 24 the teams to support the activity card. That's why they
 25 make us. And they threaten us with that, but they don't

1 threaten other, like, the rest of the student body
 2 because they have nothing to hold them by.
 3 Q. Is everyone in the student body required to
 4 purchase an activity card?
 5 A. They require athletes, but they want everybody
 6 in the student body to buy them. And since they have
 7 nothing to hold them accountable for, they threaten us
 8 with canceling our games and stuff like that.
 9 Q. So it's your understanding that all students at
 10 Locke -- strike that.
 11 It's your understanding that all athletes at
 12 Locke are required to purchase the card?
 13 A. Uh-huh.
 14 Q. And then it's your understanding that all
 15 non-athlete students are encouraged to buy the card?
 16 A. Yeah.
 17 Q. But not required?
 18 A. They are, but, you know, they can't -- they
 19 can't really force you to buy the activity card if you
 20 don't have the money and if you're not willing to buy
 21 it, because they have -- they can't say, well, I'm not
 22 going to give you a class next semester if you don't buy
 23 an activity card. And with us they can do that, they
 24 can tell us they'll cancel our games if the whole team
 25 doesn't buy them. That's what I mean.

1 Q. How much is an activity card?
 2 A. \$15.
 3 Q. Do you know if this is a school policy or
 4 district policy?
 5 A. No, I don't. But the school says it is.
 6 Q. The school says it was what?
 7 A. That it's school policy.
 8 Q. School policy. Does the school tell you that
 9 it's district policy?
 10 A. No.
 11 Q. Have you seen --
 12 A. Not that I've heard of.
 13 Q. Have you seen anything in writing regarding the
 14 school policy for activity cards?
 15 A. No. That's the thing, is that in our code of
 16 conduct it doesn't say anything about activity cards.
 17 Q. What are you referring to?
 18 A. There's this paper that they're supposed to
 19 give us at the beginning of the school year, and it
 20 says, like, what you can do and what you cannot do at
 21 school and what you can wear and what you cannot wear.
 22 And it doesn't say anything about activity cards, but
 23 yet they tell us that we are supposed to.
 24 Q. Do you know if any games have ever been
 25 canceled for students' failure to have activity cards?

1 A. Just our volleyball.
 2 Q. A game was canceled?
 3 A. Yeah.
 4 Q. That day that you were describing when you went
 5 and tried to talk to [REDACTED]
 6 A. Yeah.
 7 Q. Was any other game ever canceled because of a
 8 failure to have purchased activity cards?
 9 MS. TEITELBAUM: Objection. Calls for
 10 speculation.
 11 BY MS. STRONG:
 12 Q. That you know of. Go ahead.
 13 A. Not that I heard of and not that I know of.
 14 Q. So when you explained the situation to
 15 Ms. McGee, she said there was nothing to talk about?
 16 A. No. She refused to talk to me. She didn't
 17 want to talk to me and she said there's nothing to talk
 18 about. She just said the game's canceled. And that was
 19 that.
 20 Q. And did she tell you the game was canceled
 21 because the students didn't have activity cards?
 22 A. Oh, no. She sent Ms. Spain and our athletic
 23 director to talk to us.
 24 Q. Okay. So that same day Ms. Spain spoke to the
 25 team?

1 A. Yeah.
 2 Q. Okay. And what did Ms. Spain say?
 3 A. Well, she was -- she wasn't too happy about the
 4 decision that [REDACTED] had made, and she just told us
 5 that our game was canceled and that she was sorry that
 6 she had to deliver that message.
 7 Q. How do you know she wasn't happy about the
 8 message?
 9 A. She told us. She told us that she didn't think
 10 it was fair for them to cancel our games -- our game.
 11 Q. And was it a home game?
 12 A. It was a home game.
 13 Q. Was the other team already there?
 14 A. Yeah. So we had to pay for their bus. We had
 15 to pay an extra fee for their bus to come an earlier
 16 time.
 17 Q. Who paid the fee?
 18 A. The school.
 19 Q. How do you know that?
 20 A. Because that's how it works. If you cancel a
 21 game, you have to pay for the school's bus.
 22 Q. And how do you know about that?
 23 A. I used to be a director of athletics.
 24 Q. Where at?
 25 A. At Locke. So I used to work with the athletic

1 director.
 2 Q. And so you learned about some of these policies
 3 in that regard?
 4 A. Yes.
 5 Q. You said Ms. Spain came to speak with the team
 6 and your athletic counselor.
 7 A. Athletic director.
 8 Q. Director. Who was that?
 9 A. Mr. Fukuda.
 10 Q. Did the students all purchase activity cards in
 11 time for the next game?
 12 A. I did. I don't know the rest of my teammates.
 13 I don't think they did. They arranged some sort of --
 14 Mr. Fukuda helped my coach arrange some sort of form for
 15 our games not to be canceled and for us not having --
 16 not everyone having to buy their activity cards.
 17 Q. A waiver form?
 18 A. I guess. I guess, but I don't know for a fact.
 19 Q. How do you know about the form?
 20 A. No, there's no form. I just said that they
 21 probably arranged something, but I don't know what
 22 they -- what they did. I know I bought my activity
 23 card.
 24 Q. No other games were ever canceled?
 25 A. No.

1 Q. You described numerous counselors. Did you
 2 like those counselors?
 3 A. What counselors?
 4 Q. I'm sorry, assistant principals.
 5 A. Yes.
 6 Q. You got along with them all?
 7 A. Yes.
 8 Q. Are there any you did not get along with?
 9 A. Ms. Burns.
 10 Q. And why is it you didn't get along with
 11 Ms. Burns?
 12 A. She was always in her office and didn't really
 13 talk to people, was always yelling in the PA system and
 14 I didn't like that.
 15 Q. But the rest of the assistant principals you
 16 felt were accessible to the students and were not always
 17 in their office; is that correct?
 18 A. Yes.
 19 Q. Do you know what subjects you need to graduate
 20 from Locke?
 21 A. The requirements?
 22 Q. Yes.
 23 A. Yes.
 24 Q. And how do you know about those requirements?
 25 A. My counselor talked to us about it, and we get

1 a notice in the mail about how many years we have to
 2 have.
 3 Q. Have you had the same counselor the entire time
 4 that you've been at Locke?
 5 A. Yes.
 6 Q. And starting from 9th grade on?
 7 A. Yes.
 8 Q. And who's your counselor?
 9 A. Mr. Mandell. Double L.
 10 Q. And when did Mr. Mandell first tell you about
 11 the requirements for graduation?
 12 A. In the 9th grade most of the members of the TCA
 13 academy were placed in another program with UCLA called
 14 Careers Based Outreach Program. They were outside
 15 groups. And we went through the A through F or G
 16 requirements for college. And they told us which
 17 subjects we needed to graduate. I mean, they went over
 18 the ones that we needed to graduate, and then they went
 19 over the ones we needed to go for a four-year college.
 20 Q. And so did your 9th grade counselor or, I'm
 21 sorry, your counselor, Mr. Mandell, when you were in the
 22 9th grade, meet with all the 9th graders together? Or
 23 how did that work? How did he convey the message to
 24 you?
 25 A. He met with all of the 9th graders to introduce

1 the program.
 2 Q. I see.
 3 A. And they were, like, the messengers, they told
 4 us what we needed. And you always had access to his
 5 office to ask him what do you need to graduate and what
 6 classes do you need to stay on task.
 7 Q. Just so I understand, when you said he
 8 introduced the program, was that an assembly?
 9 A. Yeah. Just for the TCA students, two classes.
 10 Q. Two classes?
 11 A. Yes, two English classes --
 12 Q. Okay.
 13 A. -- that he had an assembly for.
 14 Q. And it was just a one-day assembly with a
 15 Careers Based Outreach Program from UCLA?
 16 A. Yes.
 17 Q. Did anyone ever go over those requirements with
 18 you again after that assembly?
 19 A. I don't remember. I always knew what I needed
 20 to graduate because I followed the other -- the A
 21 through F requirements, so I didn't worry about what I
 22 needed to graduate.
 23 Q. You were paying attention to the requirements
 24 you needed to go to college?
 25 A. Yes.

1 Q. And did Mr. Mandell tell students that he was
 2 available to discuss graduation requirements and college
 3 requirements with them?
 4 MS. TEITELBAUM: Objection. Vague and
 5 ambiguous. Are you talking about still in 9th grade?
 6 MS. STRONG: At any time.
 7 Q. Go ahead. Do you understand the question?
 8 A. Yes. Towards your 11th and 12th grade year you
 9 knew you had to contact your counselor.
 10 Q. How did you know that as a student at Locke?
 11 A. You just knew. If you wanted to go to college
 12 and you wanted to graduate, you just knew that you had
 13 to talk to your counselor to see if you were right on
 14 task to graduate for, you know, your 12th grade year.
 15 Q. Did anyone make any announcements about this?
 16 Do you remember anything like that?
 17 A. No, I don't remember, I don't remember any
 18 announcements. I only had announcements through my 9th
 19 and 10th grade year.
 20 Q. But somehow you learned about it?
 21 A. Yeah, I always knew.
 22 Q. And you think that other students knew as well
 23 by 11th grade that they needed to see a counselor --
 24 MS. TEITELBAUM: Objection. Calls for
 25 speculation.

1 MS. STRONG: Let me finish the question.
 2 Q. You knew -- let me rephrase.
 3 You also understand that other students, by the
 4 time they were in 11th grade, knew that they needed to
 5 go see a counselor if they wanted to check on the
 6 requirements they needed for graduation; is that
 7 correct?
 8 MS. TEITELBAUM: Same objection.
 9 BY MS. STRONG:
 10 Q. Go ahead.
 11 A. I don't think everyone knew. I think most
 12 members of the Transportation Careers Academy knew, but
 13 for the rest of the student body, I don't think they
 14 were all aware of that.
 15 Q. And why is it that the students -- you believe
 16 that the students in the academy were aware of the
 17 availability of going to talk to the counselor on those
 18 issues?
 19 A. Because we were pushed to go to college, being
 20 placed in that program.
 21 Q. And who was pushing you to go to college?
 22 A. That program.
 23 Q. Teachers?
 24 A. Yeah.
 25 Q. Teachers in the program?

1 A. Teachers in the program and people in the
2 transportation -- I mean in the Career Based Outreach
3 Program pushed us to go to college because that's why we
4 knew what we needed to do.

5 Q. You also said that you were mailed a notice
6 regarding the requirements. When did you receive a
7 notice regarding graduation requirements or college
8 requirements?

9 A. Well, not college requirements. College
10 requirements I already knew. And this year, around
11 November/December, counselors had to send a letter home
12 and a notice letting you know which classes you've
13 already taken and which classes you need to graduate for
14 the 2002 graduation.

15 Q. And was that addressed to your parents or to
16 you?

17 A. It was addressed to the parents. And what
18 proficiency test you needed to pass to graduate as well.

19 Q. And had you ever received a notice at any time
20 before regarding any graduation requirements?

21 A. Not that I remember.

22 Q. Okay. This might be difficult for you. I want
23 to know: What were your best subjects while at Locke
24 High School? So this is going back to 9th grade. If
25 you had to pick some of your best subjects while at the

1 Q. Any others?

2 A. My AP studio art.

3 Q. Any others?

4 A. Softball.

5 Q. Any others?

6 A. No.

7 Q. Your English literature class that you've taken
8 as a senior, so the fall of 2001, who is the teacher in
9 that class?

10 A. Ms. Moroney.

11 Q. And why is that your best? Why do you consider
12 that one of your best classes?

13 A. Because I like writing and I feel that I can
14 express myself in that class. Oh, and my creative
15 writing class, too.

16 Q. Is there anything else that makes that class
17 stand out as your best class, one of your best classes?

18 A. No, that's pretty much it. I like reading.

19 Q. So you like writing and reading and you feel
20 that you're given the opportunity to do that in that
21 class?

22 A. Yeah.

23 Q. Do you like the teacher in that class?

24 A. Yes.

25 Q. Is she one of your favorite teachers at the

1 school, what would they be?

2 MS. TEITELBAUM: Objection. Are you referring
3 to her grades?

4 MS. STRONG: No. I'm asking her what her best
5 subjects are.

6 Q. Do you understand the question?

7 MS. TEITELBAUM: Vague and ambiguous.
8 Objection. Vague as to "best."

9 BY MS. STRONG:

10 Q. Go ahead.

11 A. I'd have to say English, leadership, science,
12 and any electives.

13 Q. I suppose I should be more specific. When
14 you've identified each of these subjects, have you
15 thought of a specific class that you really enjoyed and
16 thought was your best class or is it a subject matter
17 that you're describing to me as being best?

18 A. I'm just describing you my whole, like, English
19 and history experience have been the easiest. Not the
20 easiest, but they have been the most enjoyable classes
21 and that I found best.

22 Q. And if you had to pick out particular
23 individual classes that you were enrolled in while at
24 Locke, which would be your best classes?

25 A. My English lit class this year.

1 school?

2 A. Yes.

3 Q. And why is she one of your favorites?

4 A. To me she's fun and interactive and she
5 explains the subject very well if you're unclear.

6 Q. Do you feel that you've learned a lot in that
7 class?

8 A. Not so much. I think I've learned because I
9 enjoy the class, but it's not because what she has
10 taught me, it's because it's just an easy subject for
11 me. I think I already knew.

12 Q. You've not learned anything new in the class?

13 A. No. I've learned things in creating writing,
14 new forms of creating writing that I've incorporated in
15 that class.

16 Q. Have you developed your skills in the English
17 literature class?

18 A. Yes.

19 Q. Instead of saying learning something new, do
20 you feel you've learned in terms of developing or
21 improving upon your reading and writing skills in that
22 class?

23 A. Yes.

24 Q. But you don't think that has anything to do
25 with the teacher?

1 A. No. I think that has much with my creative
 2 writing teacher.
 3 Q. And so do you think your feeling about your
 4 English literature class would be the same if you had a
 5 teacher that you didn't like in the class?
 6 A. No.
 7 Q. No? And why is that?
 8 A. Because if a teacher makes you, you know, feel
 9 uncomfortable and makes it feel like it's work work
 10 work, then you don't feel good about that class, and you
 11 feel that -- you feel that it's just a drag. And having
 12 a fun teacher, good teacher, makes you, you know, wants
 13 you to learn, do your work, and it's not too much of a
 14 hassle to do work.
 15 Q. So you think that Ms. Moroney makes it fun for
 16 you to do your work and makes you want to do your work
 17 in that class?
 18 A. Yes.
 19 Q. So in that regard, is it fair to say that
 20 Ms. Moroney contributes to you learning in that class or
 21 developing your skills in that class?
 22 A. Yes.
 23 Q. Because initially -- I just want to make sure
 24 it's clear. Because initially you said you didn't
 25 think --

1 A. Yeah, but she does make the atmosphere a little
 2 better, so I guess she does contribute to making the
 3 class a little easier and she does, you know...
 4 Q. Do you think there's something more that she
 5 could do to help you develop your skills or learn more
 6 in that class?
 7 A. I don't know. Maybe, maybe not.
 8 Q. There's nothing that you can think of --
 9 A. No, there's not.
 10 Q. Let me finish.
 11 There's nothing that you can think of that
 12 she's not doing that you would like her to do with the
 13 class?
 14 A. No.
 15 Q. You mentioned your creative writing class; is
 16 that a class from your senior year as well?
 17 A. Yes.
 18 Q. And who is the teacher in that class?
 19 A. Ms. Ogden.
 20 Q. What's the last name?
 21 A. Ogden, O G D E N.
 22 Q. And why is it that you believe that that is one
 23 of your best classes?
 24 A. I'm getting a good grade.
 25 Q. Because you're getting a good grade?

1 A. No. Why do I believe it's one of my --
 2 Q. -- best classes.
 3 A. Do you mean academically or do you mean do I
 4 enjoy that class?
 5 Q. You gave me a list and added creative writing
 6 to that list, so I want to know why you identified it as
 7 one of your best classes.
 8 A. Because I feel that I've learned. I've learned
 9 a lot in that class, many forms of writing, and I'm not
 10 condemned for using my own style of writing.
 11 Q. Miss Ogden, do you think that she's a good
 12 teacher?
 13 A. Yes.
 14 Q. And why do you think that Miss Ogden is a good
 15 teacher?
 16 A. She's patient. She has an activity for us
 17 every week and it seems like she knows what she's
 18 talking about.
 19 Q. What do you mean an activity for you every
 20 week? What is that?
 21 A. She has many forms of writing that she has us
 22 doing, such as screenplay, short story. It's not the
 23 same thing every week, every month.
 24 Q. What does that mean? For example, if the
 25 activity for the week is a screenplay, what is it that

1 you'd have to do?
 2 A. We would watch a movie and see how it's staged,
 3 how a screenplay goes and how you write a page, and the
 4 directions to the, you know, actors and stuff like that.
 5 That's what she's gone over with us during that week,
 6 that one week.
 7 Q. For example, with respect to that assignment,
 8 she'd show you a movie?
 9 A. Uh-huh.
 10 Q. She would discuss the format of the writing
 11 style with you?
 12 A. Yes.
 13 Q. And then what else would she do?
 14 A. She would show us how to write the screenplay,
 15 like for every action you have to write, like, these key
 16 words so that the actors can --
 17 Q. Stage direction?
 18 A. Uh-huh, stage direction. And that's the kind
 19 of thing that she does every week or every month with
 20 our assignments.
 21 Q. Okay. And then would you go ahead and write a
 22 screenplay or at least a portion of one?
 23 A. Yeah. Then we start doing the work.
 24 Q. Okay. And so what were the materials that she
 25 would use in that assignment, for example?

1 A. What do you mean "materials"?

2 Q. Well, she used to teach you how to do it. She

3 would use the movie?

4 A. Movie and worksheets.

5 Q. And worksheets?

6 A. Yes.

7 Q. Anything else that she would use to teach you

8 that assignment?

9 A. No.

10 Q. Okay. And you said short stories. That would

11 be, maybe, another one of her weekly activities. Can

12 you describe to me how she would go about teaching you

13 how to, I assume, write a short story?

14 A. First she would read a story, read, like,

15 various stories and show different styles of writing,

16 and they would show us that, you know, whatever style of

17 writing worked for us, worked with whatever story you

18 wrote, just as long as you followed these certain -- a

19 certain -- what do you call it? -- guideline. You have

20 to have an exposition, rise in actions, climax, falling

21 action, stuff like that. And she told us how to, you

22 know, write a good, effective story.

23 Q. So the story that you -- read one story to you

24 aloud in class; is that correct?

25 A. Yes. Several stories. If we wouldn't be able

1 to identify where the conflict was and stuff like that,

2 she would read us several stories so that we can

3 understand and we can practice that by ourselves.

4 Q. Okay. But in terms of how she taught this, she

5 would read the stories out loud to the class?

6 A. Yes. Or popcorn.

7 Q. What is popcorn? I mean, I know what the food

8 is, but I assume that's not what you're talking about.

9 A. You pick on another student to read.

10 Q. So you each had copies of the story to read?

11 A. Yes.

12 Q. Was this in a book or hand-outs or --

13 A. Hand-outs.

14 Q. Hand-outs. And then would she eventually have

15 you actually try and write a short story?

16 A. Yes.

17 Q. Were there any other materials that she used

18 other than the hand-outs that she gave you?

19 A. No, just hand-outs.

20 Q. Okay. And then you would turn the story in to

21 her?

22 A. Yes.

23 Q. Okay. Is there any other reason why you liked

24 Miss Ogden?

25 A. She makes the class fun and she interacts with

1 the class.

2 Q. And do you think there's anything more that she

3 could have done to teach you more in that class? You

4 said you learned a lot, but can you identify anything

5 that she was not doing that she could have done to help

6 you learn more in that class?

7 A. No.

8 MS. TEITELBAUM: Objection. Calls for

9 speculation.

10 MS. STRONG: Okay.

11 THE WITNESS: No.

12 BY MS. STRONG:

13 Q. You also identified AP studio art as one of

14 your best classes. Why is it that you consider AP

15 studio art one of your best classes?

16 A. Because it was, once again, a class where you

17 could express yourself. You weren't wrong for, like,

18 drawing pastels or liking painting and stuff like that.

19 Q. And who was the teacher in that class?

20 A. Ms. Motevalli.

21 Q. And when did you take that class?

22 A. My 11th grade year.

23 Q. Did you think Ms. Motevalli was a good teacher?

24 A. Yes.

25 Q. And why did you think she was a good teacher?

1 A. Because she didn't get mad if you didn't know

2 how to -- if you weren't the best artist.

3 Q. Okay. Any other reason why you thought she was

4 a good teacher?

5 A. Because she taught us many forms of art and

6 hooked us up with museums so we can display our arts.

7 Q. Did your art ever get displayed in a museum?

8 A. Yeah. Got displayed in MOCA.

9 Q. And how is it that she taught you different

10 forms of art? Can you give me an example?

11 A. I guess every month or every other month we had

12 a subject to draw about and with a different form of

13 art. Sometimes we would do charcoal and had a subject,

14 like in justice, and we would do it with charcoal. And

15 sometimes we would do painting for, say, love, and stuff

16 like that. We always had different forms of art. We

17 would do it on canvas, with wood, old objects, stuff

18 like that. It wasn't always drawing on paper kind of

19 thing.

20 Q. What did she use to teach these forms of art to

21 you?

22 A. Materials?

23 Q. Yes.

24 A. Of course, raw materials. Paints, charcoal.

25 And the old objects were donated by MOCA and WLCAC.

1 Q. What's that? Do you know?
 2 A. It's such a long -- I can't think of the --
 3 Q. -- full name?
 4 A. No.
 5 Q. WLCAC?
 6 A. CAC.
 7 Q. Can you think of part of it?
 8 A. No. But they were incorporated with the Watts
 9 Towers.
 10 Q. And so using the materials that she had, do you
 11 think that was effective in teaching you art in that
 12 class?
 13 A. Yes.
 14 Q. In terms of subjects, you said one of your best
 15 subjects was science. Is there any particular science
 16 class that you enjoyed at your school or did you like
 17 them all?
 18 A. I got good grades because I participated, but
 19 it wasn't a subject that I mastered, but I did enjoy.
 20 Q. Did you enjoy any of the classes?
 21 A. Yeah, I enjoyed one of the classes.
 22 Q. In particular? Which one was that?
 23 A. Environmental science.
 24 Q. And what grade was that?
 25 A. This is this year, so it doesn't have a final

1 grade yet.
 2 Q. And what is it that you like about that class?
 3 A. It deals with real problems.
 4 Q. Who's the teacher?
 5 A. Ms. Osisioma.
 6 Q. Can you spell that?
 7 A. O S I S I O M A.
 8 Q. So you said you learned about real problems.
 9 Can you give me some example of real problems that you
 10 learn about?
 11 A. Like how pollution is deteriorating --
 12 Q. The ocean?
 13 A. No, pollution is deteriorating our -- what are
 14 they called?
 15 Q. Ozone layer?
 16 A. Ozone layer. Stuff like that, you know. Like
 17 common sense stuff. It doesn't deal with, like,
 18 empirical formulas that you will never use in your life,
 19 you know, it deals with things that affect your daily
 20 routine, and that's what I like about that class.
 21 Q. So let's take the pollution example that you
 22 gave me. How would she teach you about pollution and
 23 its effect on the ozone layer?
 24 A. She doesn't so much teach because she was
 25 thrown in to teach that subject because there was no one

1 else to teach it, but she does make her own notes and
 2 she does discuss it with us. She doesn't have so much
 3 forms of teaching us so that we can understand, she just
 4 teaches us to the best of her ability what she knows and
 5 how she knows how to teach it.
 6 Q. Well, do you think you've learned about
 7 pollution and how it affects the ozone layer?
 8 A. By reading it, yes, but not so much by what
 9 she's demonstrated.
 10 Q. Okay. Let me separate something out. Do you
 11 think that Ms. Osisioma is a good teacher?
 12 A. Yes.
 13 Q. You would think she's a good teacher?
 14 A. Yes, I think she's a good teacher.
 15 Q. Why do you think she's a good teacher?
 16 A. Because she tries to help. Like you can ask to
 17 speak to her if you don't understand, and she doesn't
 18 embarrass you in front of the whole class and make you
 19 feel bad about a subject that you might not understand.
 20 Q. You said she was thrown into this class; what
 21 did you mean by that?
 22 A. There was no one else that was -- there was a
 23 teacher who was originally supposed to be teaching that
 24 subject and who had been teaching that subject for, I
 25 guess, two years, and he didn't want it, he didn't want

1 that job, so he got promoted to another high school and
 2 he left. So I guess Ms. Osisioma had an extra period.
 3 I don't know. And they made her the teacher of the
 4 class.
 5 Q. Okay. And given that background, you still
 6 think that she's a good teacher for the environmental
 7 science class?
 8 A. Yes. She's doing what she can with what she's
 9 been given.
 10 Q. You said you feel you've learned more from the
 11 reading than what she's teaching you; is that what you
 12 testified to?
 13 A. She's teaching us straight out from the book,
 14 so the notes that we take are the notes that are already
 15 in the book. So it's not so much that she has many
 16 forms of teaching, she's just pretty much reading the
 17 notes and we're taking them down.
 18 Q. As opposed to some of the other teachers you
 19 described, for example, she's not creating her own style
 20 of teaching that seems to be separate from a textbook,
 21 she's following the textbook to teach you?
 22 A. Yes.
 23 Q. Okay. And this method of teaching, though, do
 24 you think it's effective?
 25 A. I can't really answer that question because

1 it's not so much of a method, it's just reading. But
 2 she's just orally giving us the notes that are already
 3 in the book, so it's not so much a form of teaching. I
 4 don't know how to answer that question.
 5 Q. I'll take that out of the question so we don't
 6 have to stumble over that.
 7 Even though she's following the textbook in the
 8 class, do you still feel that you are learning the
 9 material in that class?
 10 A. Yes.
 11 Q. Okay.
 12 A. Because I read the book.
 13 Q. When you say you read the book, is that in
 14 response to assignments that she gives you out of the
 15 book?
 16 A. Yes.
 17 Q. So it's not as fun as some of the other classes
 18 that don't follow the book; is that correct?
 19 A. No, it's not that. It's fun.
 20 Q. But it's still -- still works to learn the
 21 material?
 22 A. It's interesting.
 23 Q. So what is the textbook that you're using in
 24 that class?
 25 A. Environmental science textbook. I don't know

1 what it's called. I think it's called Environmental
 2 Science.
 3 Q. Does Miss Osioma use any other materials to
 4 teach the class other than that environmental textbook?
 5 A. No, just that textbook.
 6 Q. Okay. And do you use the textbook in class?
 7 A. Yes.
 8 Q. Do you also take that textbook home?
 9 A. Yes.
 10 Q. Are there sufficient textbooks in that class
 11 for every student to take one home?
 12 A. Now there is, but there wasn't before.
 13 Q. Okay. At what point in time was there not
 14 enough textbooks in class for students to take them
 15 home?
 16 A. In the beginning of the school year we only had
 17 about five books and there was only five students. Then
 18 there was no room for these other students in other
 19 classrooms, in other sciences, so they just threw them
 20 in our environmental science class. That's when we had
 21 to share books. And it wasn't enough because we had
 22 about -- we had an odd number of students. So, like,
 23 you know, it's not two to a book anymore, it's like
 24 groups to a book, five group to a book.
 25 Q. I want to make sure I understand this. When

1 you first got in the class, which is September 2001,
 2 there were five books?
 3 A. And five students.
 4 Q. So each student had their own book?
 5 A. Had their own book.
 6 Q. And at that point could you take the book home?
 7 A. Yeah.
 8 Q. Did you also have a separate in-class set?
 9 A. No.
 10 Q. So the book that you used in class you would
 11 take home and then bring back to class with you?
 12 A. Yes.
 13 Q. All right. At what point were more students
 14 added to the class?
 15 A. About a week later.
 16 Q. A week after the class began?
 17 A. A week after the class began.
 18 Q. How many students were added to your class at
 19 that time?
 20 A. About, an estimated number of 15 more.
 21 Q. So the class now had 20 students in it; is that
 22 correct?
 23 A. Yes.
 24 Q. And at that time there weren't enough books for
 25 all 20 students?

1 A. No.
 2 Q. So you began to share?
 3 A. Yes.
 4 Q. Okay. Were any students able to take home the
 5 books during the period of time when you were sharing?
 6 A. Just the ones that were in the class
 7 originally. The teacher had to make copies, bad copies,
 8 of the book. Actually, she had three different versions
 9 of the book, so she had to print it out on the CD ROM.
 10 Sometimes she could make copies of our own books and
 11 give it to them.
 12 Q. Okay. But you always had a book to take home?
 13 A. Yes.
 14 Q. Because you were one of the original members?
 15 A. One of the original.
 16 Q. So for all the remaining students, it wasn't as
 17 though they didn't have anything to take home, they
 18 could take home copies of the books?
 19 A. There was times when they couldn't take
 20 anything home. We would have to alternate with the
 21 books when she wasn't able to make copies or print out.
 22 Q. From the CD ROM?
 23 A. From the CD ROM.
 24 Q. How many times do you recall students not being
 25 able to take home any materials from the class?

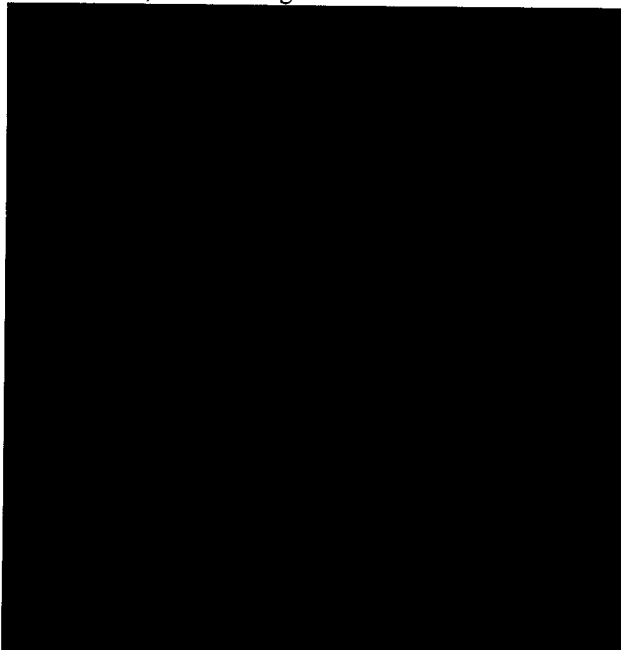
- 1 A. The first two weeks they weren't able to take.
 2 Q. The first two weeks when there were 20 students
 3 in the class?
 4 A. Yeah. They weren't able to get copies or
 5 anything. They went along with us. We shared books,
 6 but they weren't able to take it home either.
 7 Q. She didn't give you -- and she didn't give any
 8 copies to the students to take home?
 9 A. She didn't have access to a copy machine. She
 10 finally found somewhere around the school where they let
 11 her make copies.
 12 Q. Do you know, had she looked for a copy machine
 13 during that time?
 14 A. No, I don't know.
 15 Q. You don't know one way or the other whether she
 16 tried to get copies before?
 17 A. No, I don't know. But I know she, eventually,
 18 she found a machine where she could make copies.
 19 Q. And was she giving you homework during those
 20 two weeks when the students didn't have any materials to
 21 take home?
 22 A. Yes.
 23 Q. And was the homework out of the book?
 24 A. Yeah, out of the book.
 25 Q. So how were the other students doing their




- 1 A. No. Eventually the teacher just told us to be
 2 on the same page. We were all just working on the same
 3 page.
 4 Q. You don't know one way or the other whether
 5 they actually caught up or not?
 6 A. No, I don't know.
 7 Q. Okay. Now, at some point did your teacher get
 8 more books in the class?
 9 A. Yes.
 10 Q. And when did that happen?
 11 A. November, late November.
 12 Q. Okay. And do you know if the teacher had
 13 ordered more books for the class?
 14 A. Yeah, she ordered books the week that those
 15 students came in.
 16 Q. And so the students came in at some time in
 17 September?
 18 A. Uh-huh.
 19 Q. And the books arrived at some point in
 20 November; is that correct?
 21 A. Yeah.
 22 Q. And once the books arrived, there were
 23 sufficient books for every student to take them home?
 24 A. Yes.
 25 Q. Was there anything that Miss Osisoma wasn't


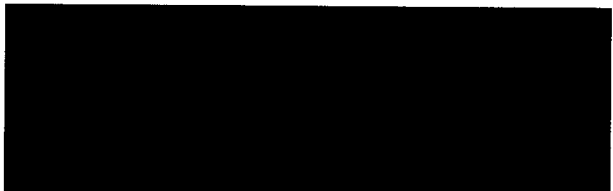
- 1 homework?
 2 A. I don't know how they managed.
 3 Q. Okay. Do you know if she made arrangements for
 4 them to have books in the library?
 5 A. No. Those five books were the only five books
 6 around the school.
 7 Q. And how do you know that?
 8 A. Because she told us that those were the only
 9 five books around the whole school.
 10 Q. Do you know if she made any arrangements for
 11 them to have a different type of homework during those
 12 two weeks?
 13 A. No, I don't know. I think they sat around the
 14 period. I recall them sitting around the whole period
 15 talking.
 16 Q. Okay. So, then, after approximately two weeks
 17 she began to make copies?
 18 A. Yeah.
 19 Q. And from that point on students always had
 20 something to take home?
 21 A. But we were always, like, we were on one -- on
 22 one page, they were on the other page. They were --
 23 they had to catch up to us. So they were doing three
 24 times the work that we were doing to catch up.
 25 Q. And then eventually they did catch up?

- 1 doing that you thought she should have been doing to
 2 teach the class?
 3 A. No.
 4 Q. You seem to hesitate. Is there something that
 5 you're thinking about?
 6 A. No. I mean, what can she do, given such
 7 limited sources? I don't know of anything that she
 8 could have done more.
 9 Q. What do you mean "with limited sources"?
 10 A. Well, first of all, she didn't have books in
 11 the beginning, and it wasn't like that was her
 12 expertise, you know. She was thrown into that subject
 13 because she was a science teacher, so they assumed she
 14 knew everything. And I guess she was -- she was doing
 15 what she could with what she had.
 16 Q. You always had a book in that class?
 17 A. Yeah, always had a book.
 18 Q. Is there anything else that you're referring to
 19 other than the textbook situation in terms of limited
 20 resources?
 21 A. No, that's about it. I mean, it's not like we
 22 do labs and go to field trips. I don't know if that's
 23 part of the class, but she does want us to go to field
 24 trips.
 25 Q. How do you know she wants you to take field

- 1 trips?
- 2 A. She told us. Because environmental science is
- 3 more of a physical science.
- 4 Q. Where does she want to take you on a field
- 5 trip?
- 6 A. To, like, aquariums, the ocean, just streets to
- 7 pick up, like, trash and see how it affects, you know,
- 8 our system, our ecosystem, stuff like that.
- 9 Q. And has she been able to do any of these field
- 10 trips yet?
- 11 A. No.
- 12 Q. And do you know if she's made any effort to get
- 13 your class out on a field trip?
- 14 A. No, I don't know.
- 15 Q. Do you know if any field trips are scheduled
- 16 for next semester?
- 17 A. No.
- 18 Q. You still have that class for next semester?
- 19 A. I might keep it.
- 20 Q. You might change it?
- 21 A. I might.
- 22 Q. To what?
- 23 A. Nothing.
- 24 Q. To drop the class?
- 25 A. My senior year I'm trying to enjoy.

- 1 Q. Okay.
- 2 A. I only need two classes to graduate.
- 3 Q. You have enough credit?
- 4 A. Yeah, I have enough credits.
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- 9 Q. Okay. Let's start with your 9th grade math
- 10 class; what was the class?
- 11 A. Algebra 1.
- 12 Q. And who was the teacher?
- 13 A. Miss Sparks.
- 14 Q. Why do you consider that one of your worst
- 15 classes?
- 16 
- 17
- 18 Q. Actually, I want to stop. 9th grade you had
- 19 two different math teachers; right?
- 20 A. Yes.
- 21 Q. So was Ms. Sparks first semester or second
- 22 semester?
- 23 A. First semester.
- 24 Q. And second semester you had?
- 25 

- 1 Q. And between the two, would you consider one
- 2 better than the other?
- 3 A. Yes.
- 4 Q. Who was better?
- 5 A. Ms. Sparks.
- 6 Q. Ms. Sparks was better?
- 7 A. Uh-huh.
- 8 Q. Why was Ms. Sparks better than 
- 9 A. Because she had -- if you didn't -- she had
- 10 different methods of teaching. She wasn't so aggressive
- 11 with the teaching. She took it easy on us.
- 12 Q. And you prefer that?
- 13 A. Yeah.
- 14 Q. Did you like her method of teaching?
- 15 A. Yeah, I liked her method of teaching. If I
- 16 didn't understand, she came up with another way to make
- 17 you understand.
- 18 Q. And did you think she was a good teacher?
- 19 A. Yes.
- 20 
- 21
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1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 Q. What materials did Ms. Sparks use to teach the
 13 class, your 9th grade year?
 14 A. Chalkboard. Chalk and chalkboard.
 15 Q. And you described her as you liked the way she
 16 taught.
 17 A. I liked the way she taught.
 18 Q. What was it that you liked about the way she
 19 taught?
 20 A. She had different methods of teaching.
 21 Q. Like what?
 22 A. Like she taught us how to back solve.
 23 Sometimes, if we didn't know how to get the answer, she
 24 would give us the answer first and you would have to go
 25 back to the steps and think of, like, think of the steps

1 were old and deteriorating.
 2 Q. You don't know why it was that she chose not to
 3 use the books?
 4 A. I don't know why.
 5 Q. Were the books old?
 6 A. Yes.
 7 Q. How do you know that?
 8 A. They were deteriorating. They were wet. They
 9 had, like, you know, like mold and stuff like that, that
 10 makes them old.
 11 Q. You saw mold on a book?
 12 A. Huh?
 13 Q. You saw mold on a book?
 14 A. Yeah. They had years past, like from
 15 seventies, stuff like that.
 16 Q. Do you know if your teacher wanted to use books
 17 to teach the class?
 18 A. No, I don't know. I guess she didn't prefer
 19 it, but --
 20 Q. You don't think she preferred it?
 21 A. I don't think she preferred it. No, I don't
 22 think she --
 23 Q. And why do you think that?
 24 A. She didn't use them.
 25 Q. You think if she had wanted to use the books

1 that you would have taken to get that answer. So she
 2 taught us how to do that. It wasn't just, oh, get the
 3 answer and get the answer. It was just different forms
 4 that she taught and made it easier.
 5 Q. Okay. Do you think there was something more
 6 that she could have done to teach you the subject any
 7 better than she did?
 8 A. If I liked the subject, maybe. But no. No.
 9 Q. Okay. And did you use a book in that class?
 10 A. Sort of. Not really. We used mostly
 11 worksheets that were made by a department chair. And we
 12 had books -- well, not so many books. We had, like,
 13 half of the class had books.
 14 Q. Half of the class what?
 15 A. Half of the class didn't have books and half of
 16 the class did, so we had to share the books. But we
 17 rarely used them. They were useless to her. She didn't
 18 use them.
 19 Q. Do you know why it was that she didn't use
 20 them?
 21 A. No.
 22 Q. I mean, you said that they were useless to her;
 23 is that because of her teaching style?
 24 A. No. I don't know. Might have been her
 25 teaching style, might have been the fact that the books

1 she would have at least used the books that you had in
 2 your class --
 3 A. Yes.
 4 Q. -- but she chose not to most of the time --
 5 A. Yes.
 6 Q. -- is that correct?
 7 A. Yes.
 8 Q. And so these worksheets that were prepared by
 9 the department chair, do you know if many of the math
 10 teachers used those worksheets?
 11 A. The algebra 1, he made sets for algebra 1,
 12 algebra 2, geometry and calculus and math analysis. So
 13 there was that one -- go ahead.
 14 Q. Go ahead.
 15 A. There was that one teacher that created the
 16 work for the week, and they submitted it to him, he
 17 typed it and then printed it up.
 18 Q. So the teachers, the math teachers, would work
 19 together?
 20 A. Yes.
 21 Q. And each would, on a weekly basis, submit
 22 something to him?
 23 A. Yes. And he would print it -- I mean, type it
 24 up, print it out, and then publish them.
 25 Q. Okay. And was that -- when you said, you know,

1 for example, he would provide worksheets for algebra 1,
2 were those worksheets for the entire year of algebra 1,
3 for the entire course?

4 A. Every week, yeah. Every week we had different
5 assignments.

6 Q. What I'm trying to say, I guess, is: The
7 worksheets would take the students through their entire
8 course?

9 A. Yeah.

10 Q. And they were intended to be the teaching
11 materials for that course; is that correct?

12 A. Yes.

13 Q. Okay. And how is it that you know that?

14 A. Because they're the ones -- those are the kind
15 of work that she gave us throughout the whole year, the
16 worksheets.

17 Q. Do you think your teacher liked using those
18 worksheets?

19 MS. TEITELBAUM: Objection. Calls for
20 speculation.

21 BY MS. STRONG:

22 Q. Ms. Sparks, for example. Go ahead.

23 A. I don't think she had another option. It's not
24 like she had books.

25 Q. Well, she had some books in her class and you

1 another class with another teacher and it's a totally
2 different style. And on top of that, she got promoted
3 and was hardly ever there to teach us. So that's what
4 made her hard -- her class hard.

5 Q. And when you said she was hardly ever there to
6 teach you, you mean she missed classes?

7 A. Yeah, she missed.

8 Q. And if you had to give your best estimate as to
9 how many classes she missed during that semester, what
10 would that be?

11 A. I don't know. I honestly don't know how many
12 times she missed. It was back in the 9th grade.

13 Q. But more than five times?

14 A. A week you mean? Or you mean throughout the
15 whole --

16 Q. No, I mean throughout the whole semester.

17 A. Oh, throughout the whole semester, more than
18 five times.

19 Q. More than once a week would she miss class?

20 A. At times.

21 Q. But sometimes she wouldn't miss any class
22 during the week?

23 A. She was more not there than there.

24 Q. Your recollection is that she missed more class
25 than she attended?

1 said she chose not to use them.

2 A. It's not like she had a huge amount of books
3 that she could give to every student to keep and take
4 home and keep at home.

5 Q. But did you ever get an impression from her
6 that she liked the approach of using those worksheets?

7 A. No, I don't --

8 Q. You don't know one way or the other?

9 A. No, I don't.

10 Q. Again, I think you already testified to this.

11 I apologize. But you don't know one way or the other
12 whether she requested a set of books for any of her
13 classes?

14 A. No, I don't.

15 Q. Okay.

16 (Brief recess.)

17 MS. STRONG: Back on the record.

18 Q. With respect to [REDACTED] math class 9th
19 grade, you explained to me that you liked Miss sparks'
20 teaching style better, but what particularly did you not
21 like about [REDACTED]

22 A. It wasn't so much that I didn't like her
23 teaching style, it was just that I was going at a
24 constant pace with Miss sparks and I was beginning to
25 understand her, and then all of a sudden boom, I'm in

1 A. Yeah.

2 Q. Who would teach the class when she was gone?

3 A. TAs.

4 Q. TAs that worked with her while she was this?

5 A. No, just TAs. Like our teacher for most of the
6 semester, when she wasn't there, was a parent that was
7 working for the school. And she was, I guess, like sort
8 of her TA.

9 Q. Do you know what kind of math skills the parent
10 had?

11 A. No.

12 Q. Do you know the parent's name?

13 A. I'm not sure if Ms. Burnett or Barnet.

14 Q. You don't know if --

15 A. Burnett or Barnet.

16 Q. You don't know in that person had a Ph.D. in
17 math, for example?

18 A. No, I don't.

19 Q. And what were the materials that you used in
20 [REDACTED] class?

21 A. Those same worksheets.

22 Q. Okay.

23 A. They were given to all the algebra 1 teachers
24 and the teachers worked with those worksheets.

25 Q. Is it your understanding that all algebra 1

1 teachers used those worksheets?
 2 A. Yes.
 3 Q. You explained to me that there's worksheets for
 4 algebra 1, algebra 2, geometry, calculus.
 5 A. Yes.
 6 Q. Is it your understanding that all teachers at
 7 Locke High School used those worksheets when they were
 8 available for their classes?
 9 MS. TEITELBAUM: Objection. Calls for
 10 speculation.
 11 BY MS. STRONG:
 12 Q. Go ahead.
 13 A. Yes.
 14 Q. And how do you know that?
 15 A. Because I knew that my -- wait. Can you
 16 rephrase that question again?
 17 Q. I'll rephrase it.
 18 Why is it that you believe all teachers that
 19 taught algebra and algebra 2, geometry and calculus used
 20 the worksheets handed out by the department head?
 21 A. Because I remember an instance when Ms. Sparks
 22 told us that we all had the same one at tutoring. She
 23 tutored not just her class but she tutored other
 24 students from algebra 1 teachers and they had the same
 25 work. And she told me that we all had the same work;

1 that when she's gone, I can get, you know, help from
 2 other classmates.
 3 Q. Okay. Based on that, you understood that
 4 that's how it worked for all of the math classes?
 5 A. Yeah. Because I had Ms. Sparks taught algebra
 6 1, and then I was transferred to [REDACTED] class and
 7 she had the same worksheets.
 8 Q. Okay. Did you pick up at relatively the same
 9 point in the class?
 10 A. What do you mean?
 11 Q. Given that they're using the same materials,
 12 did you start in [REDACTED] class the same place you
 13 left off in Ms. Sparks' class?
 14 A. No. They were at a different pace.
 15 Q. And can you -- I mean, the assignments were
 16 given on a weekly basis; correct?
 17 A. Uh-huh.
 18 Q. Do you know how many weeks apart they were off
 19 pace from one another?
 20 A. No, I don't.
 21 Q. Did you overlap at all when you went into
 22 [REDACTED] class?
 23 A. No. I think they were ahead.
 24 Q. They were further ahead?
 25 A. They were ahead doing something else that the

1 teacher taught.
 2 Q. Okay. Why is it that you changed teachers in
 3 9th grade for math? Do you know?
 4 A. No. I think, but I don't want to take a guess
 5 at it. Might have been many things.
 6 Q. You don't know?
 7 A. No, I don't. I remember.
 8 Q. You do remember?
 9 A. Yes, I do.
 10 Q. Okay.
 11 A. My classes were switched because of this one
 12 English that I was stuck in first semester of my 9th
 13 grade year. I was stuck in 11th and 12th grade English
 14 class. So when my counselor finally came back the
 15 second semester, I was placed in English 9-B with 9th
 16 graders. And I had that class for third period, and
 17 they had to switch my schedule around a little to
 18 accommodate my other classes.
 19 Q. I see. Okay. Why was it that you were given
 20 an 11th and 12th grade English class for your first
 21 semester in 9th grade?
 22 MS. TEITELBAUM: Objection. Calls for
 23 speculation.
 24 THE WITNESS: My counselor was ill.
 25 ///

1 BY MS. STRONG:
 2 Q. Was ill?
 3 A. Yes. And was pretty much out for the remaining
 4 of the first semester, and therefore I was stuck in 11th
 5 and 12th grade class. Because no other counselor would
 6 be able to change my class. They were too busy fixing
 7 other schedules and they weren't my counselors, so they
 8 couldn't mess with my program.
 9 Q. Did anyone fill in for your counselor while he
 10 was gone?
 11 A. No. He was out and that was --
 12 Q. Did you ever talk to an assistant principal or
 13 the principal about that, that issue?
 14 A. No.
 15 Q. Is there any particular reason why you didn't
 16 talk to one of them?
 17 A. I was a freshman and I didn't know my way
 18 around the school.
 19 Q. Did your mother know that you were in an 11th
 20 and 12th grade English class while you were in 9th
 21 grade?
 22 A. Yes.
 23 Q. Did she make any efforts to talk to anyone at
 24 the school about it?
 25 A. She didn't have time. She worked at night and

1 had to rest during the day.

2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]

10 A. [REDACTED] Geometry was kind of like the
11 same case where [REDACTED] math teacher, was promoted to
12 be [REDACTED]

13 [REDACTED] so he had to go to
14 conferences and he was often absent. And the subs that
15 were given to us didn't really know math. They were
16 just teachers filling in, teachers who had conference
17 periods, filling in. And so we didn't really do much
18 that semester. And he was -- the teacher was hardly
19 ever there. And by the time that he was there, it was
20 so, already, so far off the year that I didn't have a
21 chance to catch up.

22 Q. What grade is this?

23 A. 10th.

24 Q. And what semester?

25 A. First and second.

1 guess he had -- never mind. That he had. And sometimes
2 we would -- he would write the problems on the board for
3 us by the time we got to that period so they were
4 already there for us.

5 Q. While [REDACTED] was in class did you like him
6 as a teacher?

7 A. Yes.

8 Q. So your complaint about him is he missed class
9 too much?

10 A. Yeah.

11 Q. But not so much the way he taught the class?

12 A. Yes.

13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]

18 Q. Okay. And you identified AP U.S. history as
19 one of your worst classes; why is that?

20 A. The teacher isn't really patient with us, just
21 gives us worksheets and just makes us do essays, makes
22 us do political cartoons. And when she doesn't like
23 these things, she just throws them away. So all our
24 efforts go to waste, and we don't learn anything
25 throughout the -- we didn't learn -- I personally didn't

1 Q. So how often would you say [REDACTED] missed
2 class --

3 A. [REDACTED]

4 Q. [REDACTED] Oh, I'm sorry.

5 How often would you say [REDACTED] missed class
6 during the first semester if you had to give your best
7 estimate?

8 A. I can tell you in weeks. I know he was absent
9 about twice to three times a week.

10 Q. And how about during the second semester?

11 A. About the same number.

12 Q. And what were the materials that were being
13 used in the class? Those worksheets?

14 A. No. Sometimes he couldn't do them since he was
15 a chair. By that time the whole worksheet thing wasn't
16 really working anymore. Teachers were doing that on
17 their own.

18 Q. Were doing worksheets on their own?

19 A. Yeah. Each teacher was going at their own pace
20 and was printing out what they wanted to print out.

21 Q. From the worksheets that were created the prior
22 year?

23 A. Yeah.

24 Q. And were worksheets used in [REDACTED] class?

25 A. We used worksheets from time to time, but I

1 learn anything throughout the whole year. What I
2 learned was from the book.

3 Q. What year was this?

4 A. This was my 11th grade year.

5 Q. And who was the teacher?

6 A. [REDACTED]

7 Q. [REDACTED]

8 A. [REDACTED]

9 Q. So you said she'd have you write essays and
10 political cartoons and throw them out; what do you mean
11 by that?

12 A. She gave us the format of how to write the
13 paper, and if she didn't like the way you wrote the
14 paper -- not wrote the paper, like your style of
15 writing, but if you didn't have the right format, she
16 would throw the papers out without even giving the paper
17 a chance. Our political cartoons, if they weren't
18 structured and placed wherever she wanted them, she
19 would do the same thing.

20 Q. Was it just individual students she would do
21 that to or the entire class?

22 A. It was individual students that she would do
23 that to.

24 Q. Did that happen to you?

25 A. Yes. She throws my papers out a lot. She

1 throws them out a lot last year and she's done it this
 2 year.
 3 Q. What do you have her for this year?
 4 A. AP government.
 5 Q. Which is one of the other classes that you
 6 identified as one of your worst classes in school?
 7 A. Yes.
 8 Q. What are the materials that she would use to
 9 teach your class in 11th grade?
 10 A. Xerox paper and books.
 11 Q. And when you say "books," are you referring to
 12 textbooks or some other kind of books?
 13 A. Textbooks.
 14 Q. More than one textbook she'd use?
 15 A. Yes. We had a class -- well, a book that you
 16 can take home, you had to take home and bring back.
 17 Q. But there was more than one --
 18 A. -- book for -- it was a book -- every book --
 19 every student had a book.
 20 Q. Was there more than one book that was used,
 21 more than one title?
 22 A. No, just that one book.
 23 Q. Okay. So textbooks and xerox hand-outs or
 24 worksheets?
 25 A. Yes.

1 Q. Through out the year there were sufficient
 2 books for the students to take home in that class, for
 3 each student to take home?
 4 A. (Witness nods head.)
 5 Q. Correct?
 6 A. Yes.
 7 Q. We can't just nod our heads.
 8 Were you given -- well, let me rephrase that.
 9 So you could take home that textbook every
 10 night if you wanted during that year?
 11 A. You had to. She didn't want them in her class,
 12 and she didn't want them lying around in someone else's
 13 class. She would confiscate them if she saw them in the
 14 next -- next door.
 15 Q. Okay. So you would take them -- did you have
 16 lockers?
 17 A. No.
 18 Q. So you would take them home each night?
 19 A. Yes.
 20 Q. And were you assigned homework in them?
 21 A. No. We didn't really use the book. We used
 22 the worksheets and we did essays. There was some times
 23 when we would actually read the book as a class.
 24 Q. Would you use the book on your own at home or
 25 just you'd focus on the homework which is the worksheet?

1 A. She gave us so much worksheets that she based
 2 our grades on that you wouldn't really read the book as
 3 you were supposed to. You were just trying to find the
 4 answers, trying to get by every day. It was that kind
 5 of class. You wouldn't really have time to read the
 6 whole book because she assigned so many worksheets.
 7 Q. Okay. But I'm trying to understand. Were you
 8 supposed to, in doing your homework, use the textbook to
 9 complete the worksheets?
 10 A. Yes.
 11 Q. So essentially she was assigning homework from
 12 the textbook?
 13 A. Not every -- yeah, I guess.
 14 Q. I mean, to the extent she was using the --
 15 A. Yes.
 16 Q. I don't want to mischaracterize your testimony,
 17 so make sure we're clear. Is that correct?
 18 A. Yes.
 19 Q. So do you believe you learned very much in your
 20 11th grade class with her?
 21 A. No.
 22 Q. You said all that you learned was from the
 23 textbook and that was really it?
 24 A. Yeah.
 25 Q. When you generally -- when you feel that you've

1 learned in a class, you usually believe it's when the
 2 teacher goes beyond the textbook to teach you something;
 3 is that correct?
 4 A. Yes.
 5 Q. With regard to your AP government class your
 6 senior year, what does [REDACTED] use to teach that
 7 class?
 8 A. Use?
 9 Q. Materials.
 10 A. Materials? Same thing.
 11 Q. Worksheets and a textbook?
 12 A. Uh-huh.
 13 Q. And are there sufficient textbooks for the
 14 students to take them home?
 15 A. Yes.
 16 Q. Each student has their own?
 17 A. Each student has their own book.
 18 Q. And is her style in the class the same?
 19 A. Same routine.
 20 Q. And so, again, do you feel that you're learning
 21 anything in your AP government class?
 22 A. No.
 23 Q. And that's despite the fact that you have
 24 homework out of the textbook, you feel that you're not
 25 learning as much because the teacher isn't going beyond


1 that to teach you anything; is that correct?
 2 A. Yeah.
 3 Q. So if you had to identify something that you
 4 think [REDACTED] could be doing that she's not that
 5 would allow you to learn more in that class, what would
 6 that be?
 7 A. I think she would have to interact with the
 8 class a little more. Not just give the work out, but
 9 actually explain to the students how to do the work,
 10 know herself what she's teaching. She just reads the
 11 book. Without the book she's lost. She doesn't know
 12 what to teach. That's pretty much it. I think that
 13 teachers play an engaging role in their students'
 14 education really help a person learn as opposed to just
 15 giving them work.
 16 Q. You've identified best classes and worst
 17 classes. Is there any teacher that stands out as one of
 18 your best teachers or favorite teachers at school that
 19 you've not identified in describing your best classes?
 20 A. No.
 21 Q. Do you know what you're going to do when you
 22 finish high school?
 23 A. Yes.
 24 Q. What are you going to do?
 25 A. I'm going to go to college.

1 Q. Where are you going to college? Do you know?
 2 A. No.
 3 Q. Where have you applied to college?
 4 A. I've applied to UCLA, Berkeley, UC San Diego
 5 and Santa Barbara.
 6 Q. UC San Diego's my school.
 7 A. I've also applied to Cal-state Long Beach,
 8 Cal-state Northridge, Cal-state Dominguez Hills and
 9 Cal-state L.A.
 10 Q. And have you heard from any schools yet?
 11 A. No. They don't release the acceptance letters
 12 until around March, May.
 13 Q. May?
 14 A. Yeah.
 15 Q. And you took the SATs; is that correct?
 16 A. Yes.
 17 Q. Did you ever take any prep courses for the SAT?
 18 A. Yes.
 19 Q. And what did you take?
 20 A. Kaplan.
 21 Q. Where did you take Kaplan?
 22 A. At school.
 23 Q. And was it offered by the school?
 24 A. What do you mean "was it offered by the
 25 school"?


1 Q. Did you have to pay for the course?
 2 A. No.
 3 Q. So it was provided by the school for students
 4 to take?
 5 A. I'm not so sure how the funding went, but -- I
 6 don't know how funding went.
 7 Q. Okay. When did you take Kaplan?
 8 A. I took it in my 11th grade year and my 12th
 9 grade year.
 10 Q. You took two courses?
 11 A. (Witness nods head.)
 12 Q. And who could participate in the Kaplan course,
 13 to your knowledge?
 14 A. Anyone.
 15 Q. Any student at Locke High School?
 16 A. Yeah, any student.
 17 Q. Did you have to be in a certain grade to
 18 participate?
 19 A. They would give preference to 11th and 12th
 20 graders.
 21 Q. Okay. And when was the Kaplan class held?
 22 A. Saturdays.
 23 Q. Was it first or second semester?
 24 A. My 11th grade year it was second semester when
 25 I took it and my 12th grade year was the first semester.

1 Q. Okay. And how did you learn about the Kaplan
 2 course at your school?
 3 A. Our counselor sent representatives to our
 4 English class, I believe.
 5 Q. Do you know if counselors went to all
 6 classes -- let me rephrase this.
 7 Do you know if all students at Locke High
 8 School learned about the Kaplan course?
 9 MS. TEITELBAUM: Objection. Calls for
 10 speculation.
 11 THE WITNESS: Learned from who? They learned
 12 from Mr. Mandell. Their counselor didn't -- their
 13 counselors didn't tell them.
 14 BY MS. STRONG:
 15 Q. Mr. Mandell's your counselor?
 16 A. Mr. Mandell's my counselor. He's a college
 17 counselor, so he also deals with the whole school.
 18 Q. Okay. So it's his job to inform all of the
 19 students about the Kaplan courses; is that your
 20 understanding?
 21 A. Yes.
 22 Q. And do you know how he does that?
 23 MS. TEITELBAUM: Objection. Calls for
 24 speculation.
 25 THE WITNESS: What do you mean?

1 BY MS. STRONG:
 2 Q. How he informs all students at your school
 3 about the course.
 4 A. He tries his best to inform them by fliers and
 5 PA announcements.
 6 Q. Okay. So in addition to the class announcement
 7 that you received, there were also fliers that were
 8 handed out to students and PA announcements?
 9 A. Yes.
 10 Q. Go ahead.
 11 A. But that was only -- the class announcements
 12 were only to the TCA students.
 13 Q. The in-class announcements?
 14 A. Yes.
 15 Q. But there were also the fliers that went to the
 16 entire school?
 17 A. Yes.
 18 Q. How were those distributed?
 19 A. Teachers were supposed to post them in their
 20 classes.
 21 Q. Did you see any of the fliers posted?
 22 A. Yes.
 23 Q. Okay.
 24 A. And they were also -- fliers were also
 25 available in the college center.

1 
 2
 3
 4
 5
 6 Q. You know what, you brought up a good point
 7 here, which is the documents that were produced this
 8 morning. Let's just go over them so we have for the
 9 record what it is that was produced this morning. I'm
 10 sorry. I didn't make copies, so can we --
 11 Can we go off the record for a second?
 12 (Discussion held off the record.)
 13 BY MS. STRONG:
 14 Q. I'm going to hand these documents to you. Why
 15 don't you identify what each document is and then we can
 16 mark it as an exhibit for the record.
 17 A. This is my SAT scores.
 18 Q. So the first four pages are SAT scores?
 19 A. Yes.
 20 MS. STRONG: I will mark this as Exhibit 1.
 21 (The document referred to was marked by the
 22 reporter as Exhibit 1 for identification and is attached
 23 hereto.)
 24 THE WITNESS: These two pages are Stanford 9
 25 scores.

1 BY MS. STRONG:
 2 Q. Do you have Stanford 9 scores for each year?
 3 A. I don't think I ever got 10th grade scores. I
 4 didn't see them. But I do have last year's and I don't
 5 know where I put them.
 6 MS. STRONG: I'll mark for Exhibit 2 your
 7 Stanford 9 scores for the 9th grade year.
 8 (The document referred to was marked by the
 9 reporter as Exhibit 2 for identification and is attached
 10 hereto.)
 11 BY MS. STRONG:
 12 Q. Go ahead with the next ones.
 13 A. These four pages are my AP Spanish report.
 14 Q. Okay. What do you mean by that?
 15 A. AP Spanish test score.
 16 Q. And when did you take that?
 17 A. I took this in the 9th grade. I've never
 18 received my 11th grade AP U.S. history or AP chemistry
 19 reports.
 20 Q. In 11th grade you took the AP history --
 21 A. AP U.S. history and AP chemistry and I've never
 22 received those reports.
 23 Q. The exam results?
 24 A. No.
 25 Q. Is that what you're referring to, is the exam

1 results?
 2 A. That's what I'm referring, I never received
 3 them.
 4 Q. Have you asked your counselor about those exam
 5 results?
 6 A. No, I've forgotten to ask.
 7 Q. Do you think if you asked you'd be able to get
 8 those results?
 9 A. He might have them, he might not. I don't know
 10 for a fact.
 11 Q. Hold on. With respect to your AP Spanish test
 12 that you took in the 9th grade, what was your score on
 13 that test?
 14 
 15
 16
 17
 18
 19
 20 Q. All right. So I'd like to mark this as Exhibit
 21 3, which is four pages relating to the deponent's
 22 Spanish class for 9th grade.
 23 (The document referred to was marked by the
 24 reporter as Exhibit 3 for identification and is attached
 25 hereto.)

1 MS. STRONG: Can we go off the record?

2 (Discussion held off the record.)

3 MS. STRONG: Back on.

4 Q. What's next?

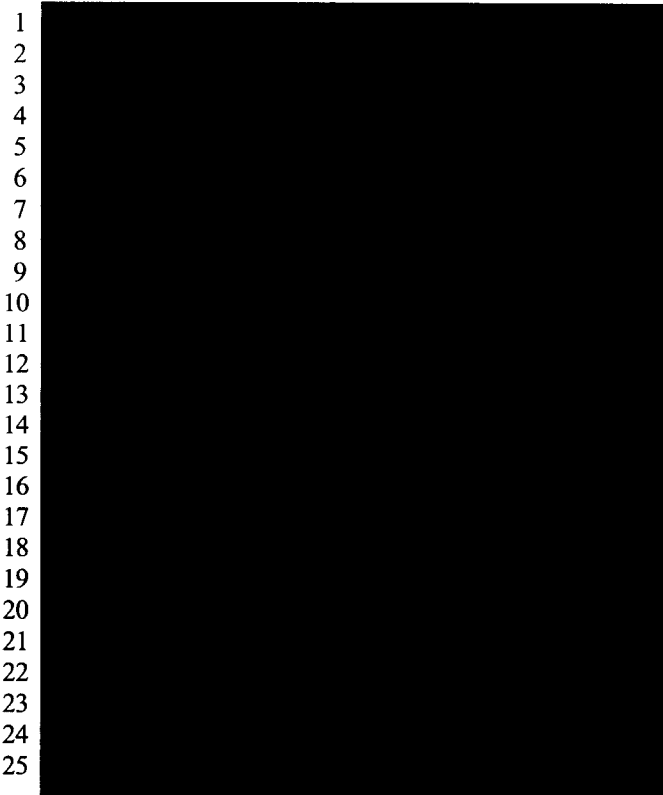
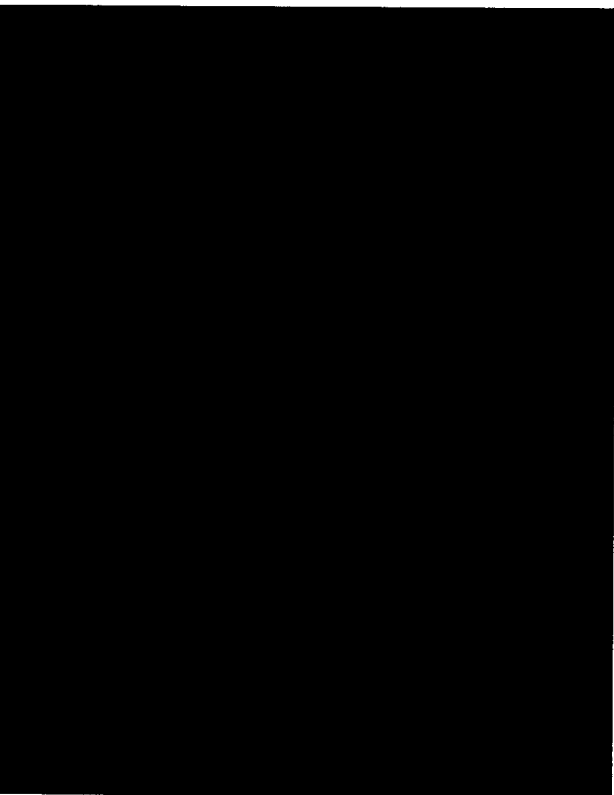
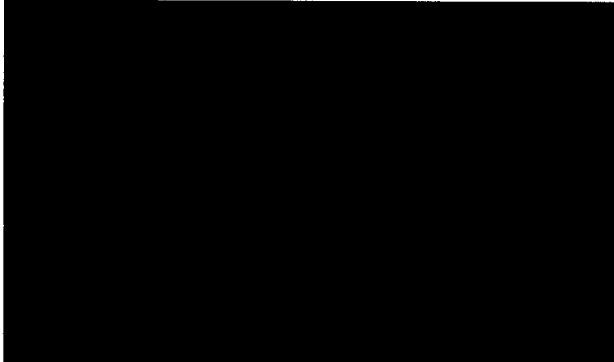
5 A. Okay. These are report cards of my 10th and
6 11th grade year, two final report cards, second
7 semester.

8 Q. So on one page I've got here two report cards,
9 one for the 10th, one for the 11th grade year.

10 I'd like to mark that as Exhibit 4.

11 (The document referred to was marked by the
12 reporter as Exhibit 4 for identification and is attached
13 hereto.)

14 BY MS. STRONG:

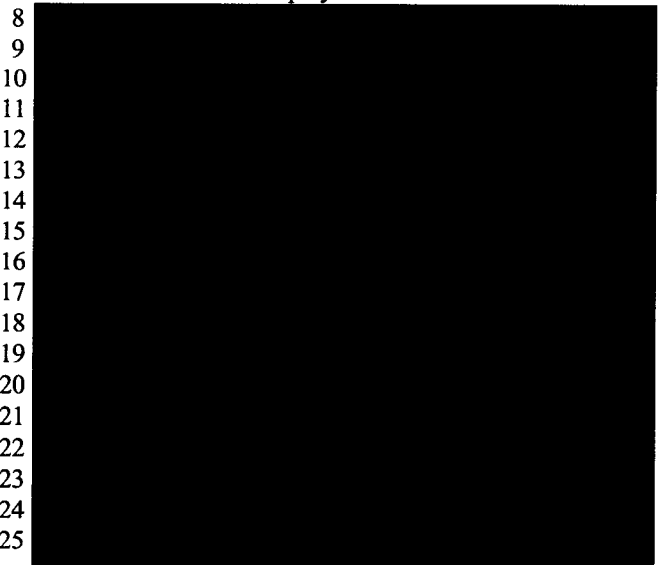


1 Q. Ms. Motevalli is this teacher that has taken
2 you to the school board meetings and some of these other
3 meetings; is that correct?

4 A. Uh-huh. Uh-huh. That was in the summertime.

5 Q. When she would take you?

6 A. Uh-huh. She was also an artist, so she had
7 work of her own to display.



1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 Q. So you took summer school in 10th grade and
 9 11th grade?
 10 A. Yes.
 11 Q. Did you take summer school any other years?
 12 A. No.
 13 Q. Why did you take summer school for your 10th
 14 grade year?
 15 A. Since I was placed in a 12th grade -- 11th/12th
 16 grade English the first semester, I had to make up that
 17 English, the 9-A English, in summer school so that I can
 18 have my English requirements fulfilled.
 19 Q. They wouldn't give you credit for the 11th/12th
 20 grade class that you took during the fall semester?
 21 A. No. It was a two-class thing. If you were
 22 missing one, you didn't get the whole semester credit,
 23 you would get half of the semester credit.
 24 Q. Who told you that you'd have to take summer
 25 school to fulfill your English requirements?

1 A. Well, I didn't have to take summer school. I
 2 could have taken it at night school or as an extra
 3 class, but I preferred to take it in summer school when
 4 it was shorter.
 5 Q. You could have taken the 9th grade class in
 6 your 10th grade?
 7 A. Yeah, I could have.
 8 Q. Could you have taken two English classes at
 9 that time?
 10 A. Yeah. And I'm not sure, I think I didn't take
 11 it because I didn't have room for another English.
 12 Q. In your 10th grade year?
 13 A. In my 10th grade year.
 14 Q. And you knew that in advance so that you took
 15 summer school to get it out of the way?
 16 A. Yeah. Our grades -- our classes get arranged,
 17 like, ahead according to how we're doing in the class.
 18 Q. What do you mean by that? Your schedule
 19 relates to how you're doing in class?
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

1 [REDACTED]
 2 [REDACTED]
 3 Q. Now, why did you also take health during the
 4 summer school of 10th grade?
 5 A. I don't have my 9th grade report card. I
 6 didn't have room for health in the 9th grade. I don't
 7 remember what other class they gave me that prepared me
 8 of having health for -- I think they offered it fifth
 9 and sixth, and I had sports sixth, and they had an AP
 10 class. The teacher wouldn't give me that class. That's
 11 so minor for an AP class. He wouldn't switch it.
 12 Counselor.
 13 Q. I just want to make sure I understand. Did you
 14 want to have your health class instead of an AP class in
 15 9th grade?
 16 A. No. I'd rather have the AP class.
 17 Q. So was it your choice, then, to take the AP
 18 class as opposed to your counselor's?
 19 A. I prefer that and my counselor also preferred
 20 that, and he had the final say-so in the decision.
 21 Q. So because you took an AP class in fifth period
 22 9th grade year and because you had a sport during your
 23 sixth period 9th grade year, you chose to take health
 24 during summer school?
 25 A. Yes.

1 Q. Could you have taken health during your 10th,
 2 11th or 12th grade years?
 3 A. I could have, but I would have been behind with
 4 my other classes. I would have been stuck in a class
 5 with 9th graders being a 10th grader. I would be
 6 catching up every year if I would do things like taking
 7 classes in another grade.
 8 Q. You only take one semester --
 9 A. Only one semester.
 10 Q. -- during your entire high school period;
 11 correct?
 12 A. Yes.
 13 Q. And you're telling me that everybody at school
 14 takes health during 9th grade?
 15 A. Uh-huh. Your health and -- what's the other
 16 class? I'm trying to think of the other class name.
 17 Something to do with ECP, educational --
 18 Q. -- career planning?
 19 A. Career planning, yeah. They make you half
 20 health and half ECP, so that it could be a whole class
 21 and it won't interfere with your schedule as opposed to
 22 take health one semester for third period and then
 23 English for another semester. It just makes more sense
 24 if you get rid of them at summer school.
 25 [REDACTED]

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
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5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
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9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19 Q. And why is it that you took American literature
20 during your 11th grade summer?

21 A. Because it was the other half of contemporary
22 composition, the class that I took in the 9th grade.

23 Q. And --

24 A. Okay. You see, contemporary composition is
25 one-half and American lit is another half.

1 Q. Okay.

2 A. And you want one instead of a half credit, so I
3 needed to take this class, have a one instead of a half
4 credit.

5 Q. Ordinarily, do students take them together in a
6 year?

7 A. Yes.

8 Q. And why didn't you take American literature
9 during your 9th grade year?

10 A. Because of composition.

11 Q. Composition?

12 A. Because I wanted to be with 9th graders. I
13 wanted to be with my classmates instead of hanging with
14 older kids.

15 MS. TEITELBAUM: Do you want me to clarify?
16 This is the English class that was the wrong year?

17 MS. STRONG: Got it.

18 Q. So your first semester in 9th grade was --

19 A. -- the contemporary composition, which
20 consisted of 10th and -- I mean, 11th and 12th graders.

21 Q. So you did receive credit for that class?

22 A. I did receive credit for that. That's why I
23 had to take this other half, so that I could get one
24 whole grade, one whole credit.

25 Q. You could have taken your American literature

1 class, then, during your 11th or 12th grade year?

2 A. Yes.

3 Q. But you chose to take it during summer school?

4 A. Yeah, I chose to take it during summer school.

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

11 BY MS. STRONG:

12 Q. What do we have next?

13 A. This is my 12th grade report card. It's not a
14 final report card yet. And at the bottom there's my
15 11th grade final report card.

16 MS. STRONG: I'd like to mark this as Exhibit
17 6, which is the document the deponent just identified.

18 (The document referred to was marked by the
19 reporter as Exhibit 6 for identification and is attached
20 hereto.)

21 THE WITNESS: Off the record --

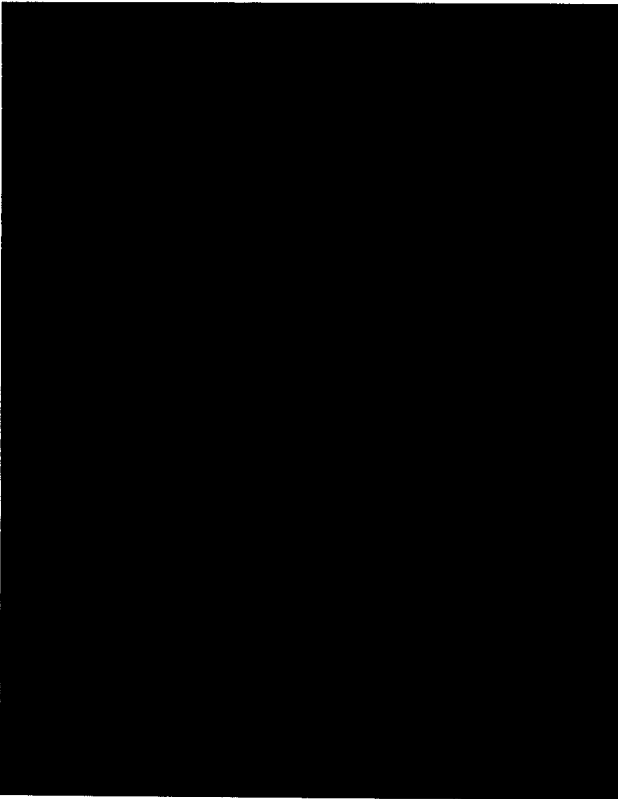
22 MS. STRONG: Hold on a second. We'll go off
23 the record.

24 (Discussion held off the record.)

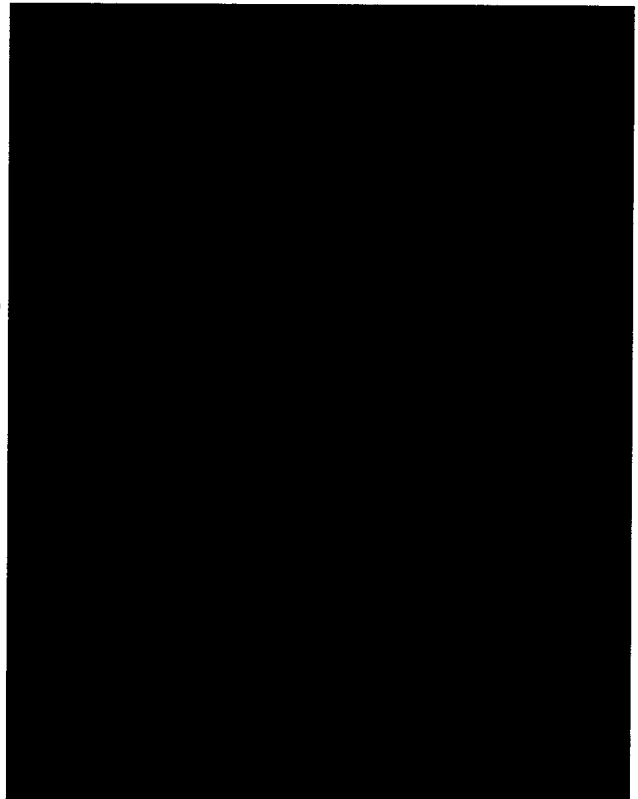
25 MS. STRONG: We'll go back on the record.

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11 [REDACTED]
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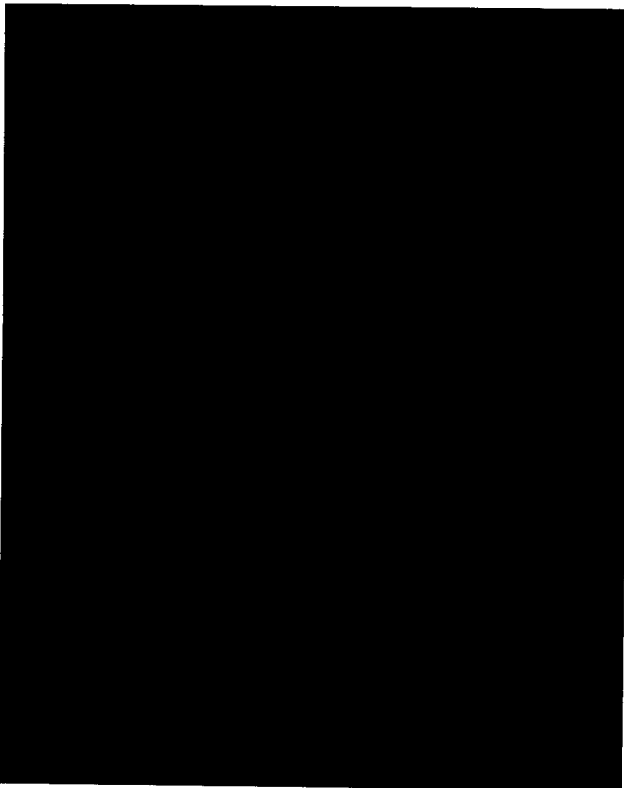
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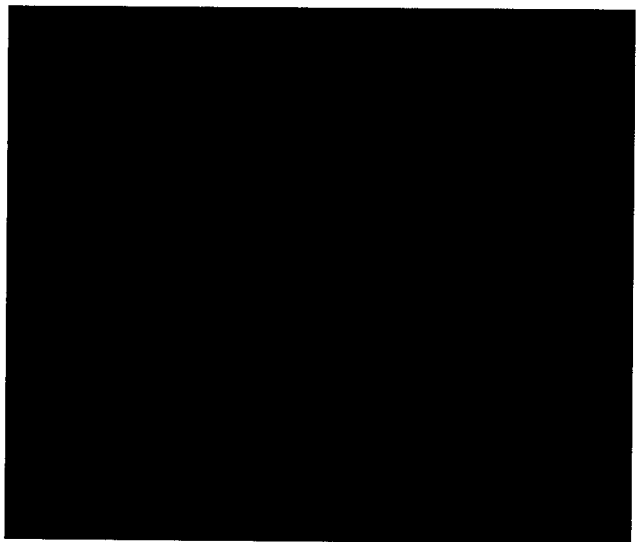
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Q. What else? What's next?

A. This is my final report card of the 10th grade.

MS. STRONG: We'll mark this as Exhibit 7.

(The document referred to was marked by the reporter as Exhibit 7 for identification and is attached hereto.)

BY MS. STRONG:

Q. And with respect to your report card for June

1 of your 10th grade year, I note a comment here that
 2 says: "Tutoring every Monday and Wednesday from 3:15 to
 3 4:15." Does that indicate that you went to tutoring
 4 every Monday and Wednesday from 3:15 to 4:15?

5 A. No, it's just an announcement.

6 Q. What does that mean?

7 A. It's just an announcement for the parent that
 8 there's tutoring every Monday and every Wednesday from
 9 3:15 to 4:15.

10 Q. Your understanding is that was printed on
 11 everyone's report card?

12 A. Yeah, everyone's report card.

13 Q. And that was during the year 10th grade, so you
 14 didn't attend any tutoring during that year; is that
 15 correct?

16 A. Yes.

17 Q. You attended your 9th grade year?

18 A. Yes.

19 Q. Is it correct that the after-school tutoring
 20 was still taking place during your 10th grade year,
 21 then?

22 A. Yes. That was on -- I'm not sure if it was
 23 regular peer tutoring or if it was -- regular tutoring
 24 or peer tutoring.

25

1 Q. And do you know who requires that you take
 2 these tests?

3 A. No, I don't.

4 Q. Okay. It looks like it's a STAR reading test.

5 A. Yes.

6 Q. Do you understand that program to only require
 7 you to take tests during the 10th grade year?

8 A. No, I don't. I don't know.

9 Q. Okay. But you only recall taking STAR reading
 10 tests during the 10th grade?

11 A. Yes.

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11 MS. STRONG: I'd like to mark these two
 12 exhibits as 8.

13 (The document referred to was marked by the
 14 reporter as Exhibit 8 for identification and is attached
 15 hereto.)

16 BY MS. STRONG:

17 Q. Okay. And what's the next document?

18 A. The next document is a standardized test that
 19 every student in my grade in 10th grade was required to
 20 take -- was required to take. There should be one more,
 21 but I can't find that one.

22 Q. One more for what grade?

23 A. For the same grade. You had to take one in the
 24 beginning of your 10th grade and at the end and see your
 25 improvement.

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Well, it's after four o'clock, and we had agreed to stop at four o'clock today. You had asked to stop at four o'clock; is that what you'd like to do?

A. Yes. Or do we have something short to go --

Q. Would you be willing to continue a little bit longer?

A. Yeah. Till five. I mean, we're already here.

Q. Okay. Let's go off the record for a second.

MS. TEITELBAUM: You understand that we're going to have to come back another day anyway?

THE WITNESS: Right.

(Discussion held off the record.)

MS. STRONG: Let's go back on the record.

Q. We've just had a discussion off the record, and counsel for the deponent has explained to me that her witness is too tired to continue; is that correct,

<p style="text-align: right;">Page 242</p> <p>1 Ms. Ortiz?</p> <p>2 A. Yes.</p> <p>3 Q. So you don't feel that you'd be able to give</p> <p>4 your best testimony if we continued at this point?</p> <p>5 A. No.</p> <p>6 Q. "No," you would not?</p> <p>7 A. No, I don't want to continue. I wouldn't give</p> <p>8 me best.</p> <p>9 MS. STRONG: Could we go off the record again?</p> <p>10 (Discussion held off the record.)</p> <p>11 MS. STRONG: Why don't we go back on.</p> <p>12 Off the record we've agreed tentatively to</p> <p>13 proceed with Ms. Ortiz' deposition on January 12th, and</p> <p>14 if -- counsel for the plaintiffs will send a confirming</p> <p>15 letter after she's confirmed that with her client's</p> <p>16 schedule. Is that correct?</p> <p>17 MS. TEITELBAUM: Yes.</p> <p>18 MS. STRONG: And in terms of a closing</p> <p>19 stipulation, may we stipulate that copies of documents</p> <p>20 attached to the deposition may be used as originals?</p> <p>21 May we stipulate that the original of this deposition be</p> <p>22 signed under penalty of perjury; that the original be</p> <p>23 delivered to the office of plaintiffs' counsel; that the</p> <p>24 reporter is relieved of liability for the original</p> <p>25 deposition; that the witness will have 30 days from the</p>	<p style="text-align: right;">Page 244</p> <p>1 MS. TEITELBAUM: That's it.</p> <p>2 MS. STRONG: Okay.</p> <p>3 MS. TEITELBAUM: Shall we just ink over them?</p> <p>4 MS. STRONG: How ever you'd like to do. And</p> <p>5 you're only redacting the telephone number from those</p> <p>6 documents; is that correct?</p> <p>7 MS. TEITELBAUM: That's correct. Just to</p> <p>8 clarify, her address has already been redacted.</p> <p>9 MS. SHARGEL: So stipulated.</p> <p>10 MS. STRONG: You stipulated to what I stated?</p> <p>11 MS. SHARGEL: Yes.</p> <p>12 THE REPORTER: Would you like a copy, counsel?</p> <p>13 MS. SHARGEL: Yes.</p> <p>14 MS. TEITELBAUM: Yes. And a condensed and a</p> <p>15 disk.</p> <p>16 (Whereupon at the hour of 4:25 p.m. the</p> <p>17 deposition was adjourned.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 243</p> <p>1 date of the court reporter's transmittal letter to</p> <p>2 plaintiffs' counsel to sign and correct the deposition,</p> <p>3 and plaintiffs' counsel shall notify all parties in</p> <p>4 writing of any changes in the deposition; and if there</p> <p>5 are no such changes or signature within that time, that</p> <p>6 any unsigned and uncorrected copy may be used for all</p> <p>7 purposes as if signed and corrected?</p> <p>8 MS. TEITELBAUM: I will stipulate to that. I</p> <p>9 just want to point out that as we were going through</p> <p>10 some of these documents, the plaintiff's telephone</p> <p>11 number is on those documents and I would like to redact</p> <p>12 them off.</p> <p>13 MS. STRONG: Which documents?</p> <p>14 MS. TEITELBAUM: Her attendance --</p> <p>15 MS. STRONG: Do you have the numbers?</p> <p>16 MS. TEITELBAUM: I don't.</p> <p>17 MS. STRONG: Attendance slips?</p> <p>18 MS. TEITELBAUM: The attendance slips.</p> <p>19 MS. STRONG: Which is Exhibit 8. Anything</p> <p>20 else?</p> <p>21 MS. TEITELBAUM: The report cards as well. Her</p> <p>22 address was redacted out, but her telephone number</p> <p>23 appears, and I would like to get that removed.</p> <p>24 MS. STRONG: So Exhibits 4, 5, 6, 7 and 8.</p> <p>25 Anything else?</p>	<p style="text-align: right;">Page 245</p> <p>1 Declaration</p> <p>2</p> <p>3</p> <p>4</p> <p>5 I hereby declare I am the deponent in the within</p> <p>6 matter; that I have read the foregoing deposition and</p> <p>7 know the contents thereof, and I declare that the same</p> <p>8 is true of my knowledge, except as to the matters which</p> <p>9 are therein stated upon my information or belief, and as</p> <p>10 to those matters, I believe it to be true.</p> <p>11 I declare under the penalties of perjury of the</p> <p>12 State of California that the foregoing is true and</p> <p>13 correct.</p> <p>14 Executed on the day of , 2002</p> <p>15 at , California.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">W i t n e s s</p>

1
2 I, Philip D. Norris, a Certified Shorthand Reporter
3 for the State of California, do hereby certify:
4 That prior to being examined, Lucia Ortiz, the
5 witness named in the foregoing deposition, was by me
6 duly sworn to testify the truth;
7 That said deposition was taken before me pursuant
8 to notice, at the time and place therein set forth, and
9 was taken down by me in shorthand and thereafter reduced
10 to typewriting via computer-aided transcription under my
11 direction;
12 I further certify that I am neither counsel for,
13 nor related to, any party to said action, nor in anywise
14 interested in the outcome thereof.
15 In witness whereof, I have hereunto subscribed my
16 name this day of , 2002.

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19 Philip D. Norris
CSR NO. 4980
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