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DECLARATION OF JEFFREY D. SEALS

I Jeffrey D. Seals, declare and state:

1. I am a Senior at Mount Whitney High School in Visalia, California and a plaintiff in this lawsuit. This Declaration is based on my own personal knowledge and, if called upon to do so, I could and would competently testify to the matters set forth in this declaration.

2. The purpose of this declaration is to describe the poor conditions in Mount Whitney High, including the lack of textbooks, the overcrowding, the filthy bathrooms and the decrepit physical condition of portions of the school.

3. At my school, we do not have enough textbooks for all our major subjects. For example, we had no textbooks in my ninth grade English class. My business technology class was taught using workbooks, but, due to the shortage of materials, we were not allowed to write in the workbooks that were provided to us. Our math books were also inadequate – my math class last year was taught without the use of texts, and solely from workbooks. Most of the textbooks that are provided for my other classes are out-of-date, and many are from the 1970s.

4. The school also is severely overcrowded. We do not have enough classrooms for all of our classes. At the beginning of each school year, students are placed into "overflow classes" created in an attempt to compensate for the lack of classroom space. Rather than receiving regular academic instruction, the students in overflow rooms miss instructional time while waiting to be reassigned to regular classes. I have seen an overflow room so crowded that, not only was the room at standing-room-only capacity, but students were forced to stand outside as well.

5. Even after seating arrangements are worked out, some classes are taught without adequate classroom space. My geometry class – and, most of the math classes taught last year at my school – were taught in a section of the cafeteria that was separated from the main cafeteria room by removable partitions. The school's small general-purpose and student meeting building also is used to conduct classes. (This building also has been partitioned using movable walls to provide makeshift rooms for classes.) Overcrowding and an inadequate number of restrooms also

1 force many students to choose between eating lunch or using the restroom during our 40 minute
2 lunch period – due to lines and crowding in the halls, there rarely is time to do both.

3 6. Additionally, the overcrowding problem was aggravated last year by the
4 implementation of a new “closed campus” policy, which required all students to eat lunch on
5 campus. We do not have enough room in the cafeteria to accommodate all students who must eat
6 during the lunch periods. (Our cafeteria seats only about 250 of the 2000 students who attend
7 Mount Whitney High.) The rest of the student body was forced to eat outside, which is a problem
8 during the hot months in Visalia, when temperatures often reach into the 100s. The lack of
9 seating was especially problematic for me because I have asthma and could not eat lunch outside
10 in the heat. As a result, my grandmother was required to drive to school each day to “sign me
11 out” during lunch so that I could eat at home.

12 7. The physical condition of my school also is very poor. I have been told that Mount
13 Whitney High has not had any significant renovations since the 1970s, and it shows. The
14 drinking fountains are in disrepair and the condition of the bathrooms is deplorable. The roof in
15 the band room is falling in, and it leaks on the band when it rains.

16 8. Problems also exist with the air conditioning in Mount Whitney High, which shuts
17 down on some of the hottest days of the year because the school participates in the Visalia’s
18 “cycling” program. As I understand from recent news articles on the cycling program, my school
19 has agreed to allow the City to shut down its air conditioning on especially hot days in exchange
20 for a discount on its electricity bill. This is particularly troubling for me because, due to my
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1 asthma, I can become very ill if I am forced to stay in a hot, stuffy environment. I am concerned
2 that I may miss school days next year if our air conditioning is shut off.
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4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.
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7 Signed this 21st day of August, 2000 in Visalia, California.
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10 Jeffrey D. Seals
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