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12 FAIR EDUCATION SANTA  
13 BARBARA, INC.

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **COUNTY OF SANTA BARBARA**

16 FAIR EDUCATION SANTA BARBARA,  
17 INC., a 501(c)(3) organization

18 Plaintiff,

19 vs.

20 SANTA BARBARA UNIFIED SCHOOL  
21 DISTRICT, a public-school district; CARY  
22 MATSUOKA, in his official capacity; and  
23 JUST COMMUNITIES CENTRAL  
24 COAST, INC., a 501(c)(3) organization,

25 Defendants.

Case No.: 19CV01875

**DECLARATION OF KATI HEDDEN IN  
SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANTS'  
SPECIAL MOTION TO STRIKE**

Date: September 17, 2019  
Time: 9:30 AM  
Dept.: 3

Date Filed: April 8, 2019  
Trial Date: None Yet

[Assigned for all purposes to Hon. Thomas  
P. Anderle, SB Dept. 3]

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1 **DECLARATION OF KATI HEDDEN**

2 I, Kati Hedden, declare and state as follows:

3 1. I am a former teacher at La Colina Junior High School in the Santa Barbara Unified  
4 School District having last taught in the district during the 2016/2017 school year. I am an  
5 individual over the age of 18 and have personal knowledge of the facts set forth below and if  
6 called as a witness, could testify competently thereto.

7 2. I was an 8<sup>th</sup> Grade teacher at La Colina Junior High School (“La Colina”) during  
8 the 2016/2017 school year. I am a fully licensed and credentialed teacher and graduated from the  
9 University of California, Berkeley with a degree in Comparative Literature. I also have a master’s  
10 degree in Italian Studies from New York University and a degree in Secondary Education and  
11 Teaching from the University of California, Santa Barbara. As a teacher at La Colina, I was  
12 responsible for a class of approximately 30 students and cared very deeply for their educational  
13 advancement and also their social and emotional well-being. As a teacher, my paramount concern  
14 is always the well being of my students.

15 3. I was made aware by the administration at La Colina of several programs offered to  
16 staff and students by an organization named Just Communities Central Coast (“JCCC”). Two  
17 such programs were “Talking In Class” which was offered to students and “Institute for Equity in  
18 Education” (“IEE”) which was offered to teachers and staff.

19 4. With respect to the Talking in Class program, I was required by the JCCC program  
20 administrator to select several students in my class to attend the program. I was specifically told  
21 by JCCC to only select students of Hispanic ethnicity to attend the Talking in Class program.  
22 Teachers are not permitted to attend the Talking In Class program and, as far as I was made aware,  
23 the curriculum is not available for review.

24 5. I became concerned about the Talking In Class program when several of my  
25 students returned to my class from participating in the program visibly upset and not wanting to  
26 return. In particular, I discussed the program with one such student who was extremely upset and  
27 emotional and informed me that in the program the students were instructed to yell out names they  
28 had been called in the past and many of them were racially charged slurs. I was told that this

1 brought up traumatic memories for this particular student and that he did not want to attend the  
2 program any longer. I felt that this curriculum was too much for even high school students, let  
3 alone middle school and junior high students.

4 6. I also discussed this issue with the JCCC facilitator running the program, who  
5 confirmed what had occurred. Upon further investigation, I learned that the JCCC facilitators  
6 running the Talking In Class program are not trained teaching professionals and are not trained in  
7 this area. This program was extremely concerning to me because it was being imposed on  
8 impressionable young children with no real warning about the possibility of bringing up traumatic  
9 issues.

10 7. I was also asked by the administration at La Colina to participate in JCCC's IEE  
11 program in the Fall of 2016. The IEE program was offered to teachers and staff and was a more  
12 diverse group than the Talking In Class program, with people of different racial and ethnic  
13 backgrounds participating.

14 8. At the IEE program that I attended, the JCCC instructors required the participants  
15 to divide themselves into separate racial groups (e.g. Caucasian participants formed one group and  
16 so-called "people of color" formed another group). The Caucasian group was then required to sit  
17 and listen to the other group describe their past experiences of racism. The Caucasian group was  
18 also required to confirm or deny things such as whether they had ever been let off by the police or  
19 whether they had ever individually been accused of being "racist." However, the Caucasian group  
20 was not allowed to explain the circumstances behind any of these issues or to respond to any of  
21 the comments from the other group. The JCCC facilitators stated that allowing the Caucasian  
22 group to respond or explain is a form of "collusion" against people of color. Indeed, there was a  
23 portion of the JCCC presentation that stated in sum and substance that Caucasian people  
24 explaining or responding to allegations of racism was in and of itself a form of racism and  
25 "collusion."

26 9. At the end of the IEE program, the participants were divided into smaller break out  
27 groups for final comments and debriefing. In this session, I raised the concern that JCCC's  
28 programming seemed to be creating more division and more discrimination amongst people of

1 various backgrounds and that not allowing Caucasian participants to speak during the program  
2 was counter-productive to having an open dialogue. The JCCC facilitator was not pleased with  
3 my comments and informed me that I need to come to terms with my “whiteness” and I was  
4 referred to another JCCC program to attend.

5 10. I believe that JCCC’s programming is truly counter-productive to their stated  
6 mission of promoting harmony and understanding amongst different groups. Their programming  
7 is completely biased and one-sided and does not allow any viewpoints to be expressed that run  
8 counter to what they are teaching. This is particularly problematic with respect to their programs  
9 directed at students, as students should be presented with differing and alternative viewpoints and  
10 not indoctrinated with one-sided programming that I believe is creating even further division  
11 amongst people of different backgrounds.

12 I declare under penalty of perjury under the laws of the State of California and the United  
13 States of America that the foregoing is true and correct.

14 Executed this 30<sup>th</sup> day of August, 2019 at Lahaina, Maui, Hawaii.

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17 KATI HEDDEN

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