

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

WILLIAM PENN SCHOOL  
DISTRICT, *et al.*,

Petitioners,

v.

PENNSYLVANIA DEPARTMENT  
OF EDUCATION, *et al.*,

Respondents.

No. 587 MD 2014

# Appendix C

## Photographs Admitted Into Evidence by Petitioners

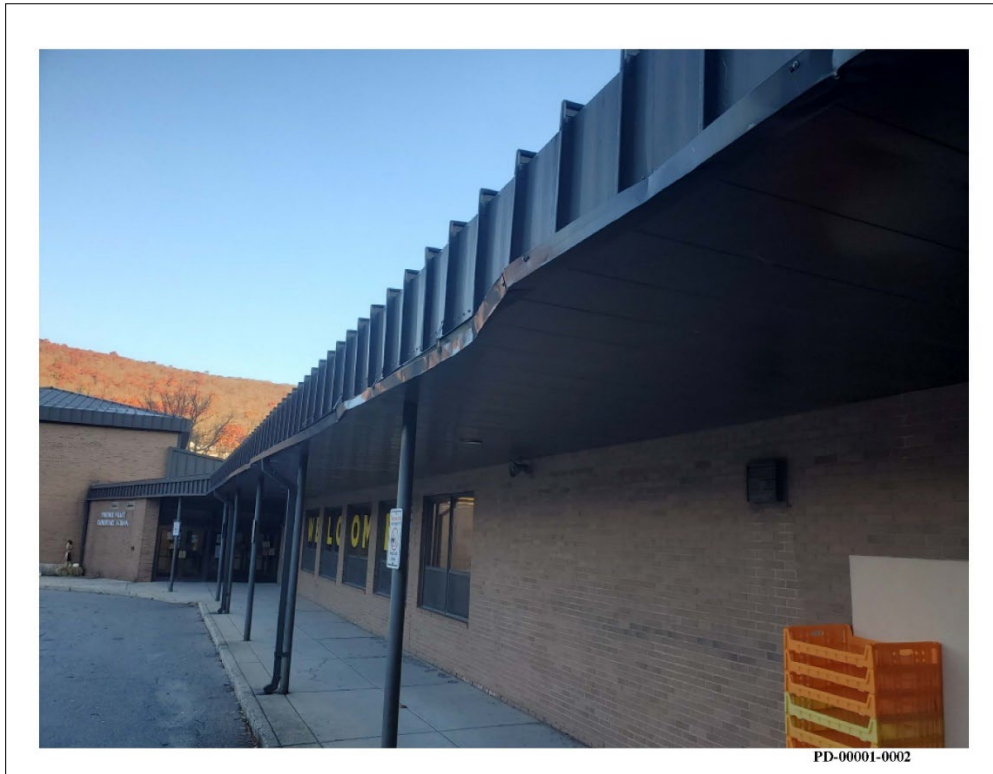
<b>Page</b>	<b>Exhibit</b>	<b>District</b>
C-1	PD-1-02	Panther Valley School District
C-2	PD-1-03	Panther Valley School District
C-3	PD-1-04	Panther Valley School District
C-4	PD-1-05	Panther Valley School District
C-5	PD-1-06	Panther Valley School District
C-6	PD-1-07	Panther Valley School District
C-7	PD-1-08	Panther Valley School District
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C-10	PD-1-11	Panther Valley School District
C-11	PD-1-12	Panther Valley School District
C-12	PD-1-13	Panther Valley School District
C-13	PD-1-14	Panther Valley School District
C-14	PX-270	Greater Johnstown School District
C-15	PX-276	Greater Johnstown School District
C-16	PX-280	Greater Johnstown School District
C-17	PX-282	Greater Johnstown School District
C-18	PX-296	Greater Johnstown School District
C-19	PX-396	School District of Lancaster
C-20	PX-402	School District of Lancaster
C-21	PX-405	School District of Lancaster
C-22	PX-422	School District of Lancaster
C-23	PX-427	School District of Lancaster
C-24	PX-455	School District of Lancaster
C-25	PX-488	School District of Lancaster
C-26	PX-500	School District of Lancaster
C-27	PX-518	School District of Lancaster
C-28	PX-538	School District of Lancaster
C-29	PX-539	School District of Lancaster
C-30	PX-545	School District of Lancaster
C-31	PX-555	School District of Lancaster
C-32	PX-568	School District of Lancaster

C-33	PX-573	School District of Lancaster
C-34	PX-583	School District of Lancaster
C-35	PX-585	School District of Lancaster
C-36	PX-589	School District of Lancaster
C-37	PX-594	School District of Lancaster
C-38	PX-597	School District of Lancaster
C-39	PX-605	School District of Lancaster
C-40	PX-614	School District of Lancaster
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C-42	PX-622	School District of Lancaster
C-43	PX-656	School District of Lancaster
C-44	PX-685	School District of Lancaster
C-45	PX-689	School District of Lancaster
C-46	PX-691	School District of Lancaster
C-47	PX-694	School District of Lancaster
C-48	PX-714	School District of Lancaster
C-49	PX-730	School District of Lancaster
C-50	PX-3497	Wilkes-Barre Area School District
C-51	PX-3501	Wilkes-Barre Area School District
C-52	PX-3517	Wilkes-Barre Area School District
C-53	PX-3537	Wilkes-Barre Area School District
C-54	PX-3545	Wilkes-Barre Area School District
C-55	PX-3553	Wilkes-Barre Area School District
C-56	PX-3559	Wilkes-Barre Area School District
C-57	PX-3562	Wilkes-Barre Area School District
C-58	PX-3564	Wilkes-Barre Area School District
C-59	PX-3581	Wilkes-Barre Area School District
C-60	PX-3591	Wilkes-Barre Area School District
C-61	PX-3607	Wilkes-Barre Area School District
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C-63	PX-3642	Wilkes-Barre Area School District
C-64	PX-3660	Wilkes-Barre Area School District
C-65	PX-3695	Wilkes-Barre Area School District

C-66	PX-3707	Wilkes-Barre Area School District
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C-73	PX-3798	Wilkes-Barre Area School District
C-74	PX-3800	Wilkes-Barre Area School District
C-75	PX-3802	Wilkes-Barre Area School District
C-76	PX-3814	Wilkes-Barre Area School District
C-77	PX-3824	Wilkes-Barre Area School District
C-78	PX-3840	Wilkes-Barre Area School District
C-79	PX-3865	Wilkes-Barre Area School District
C-80	PX-3899	Wilkes-Barre Area School District
C-81	PX-4169	William Penn School District
C-82	PX-4175	William Penn School District
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C-89	PX-4211	William Penn School District
C-90	PX-4212	William Penn School District
C-91	PX-4213	William Penn School District
C-92	PX-4215	William Penn School District
C-93	PX-4217	William Penn School District
C-94	PX-4218	William Penn School District
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C-115	PX-4391	William Penn School District
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C-117	PX-4412	William Penn School District
C-118	PX-4413	William Penn School District
C-119	PX-4415	William Penn School District
C-120	PX-4416	William Penn School District
C-121	PX-4417	William Penn School District
C-122	PX-4427	William Penn School District
C-123	PX-4431	William Penn School District
C-124	PX-4437	William Penn School District
C-125	PX-4440	William Penn School District
C-126	PX-770	School District of Philadelphia
C-127	PX-772	School District of Philadelphia
C-128	PX-774	School District of Philadelphia
C-129	PX-776	School District of Philadelphia
C-130	PX-777	School District of Philadelphia

**PD-1-02** depicts the front of Panther Valley School District's elementary school, where the façade and roof have degraded. Tr. 785:23-786:10 (McAndrew). This accurately depicts what the Panther Valley School District's elementary school looks like today. Tr. 786:1-4 (McAndrew).



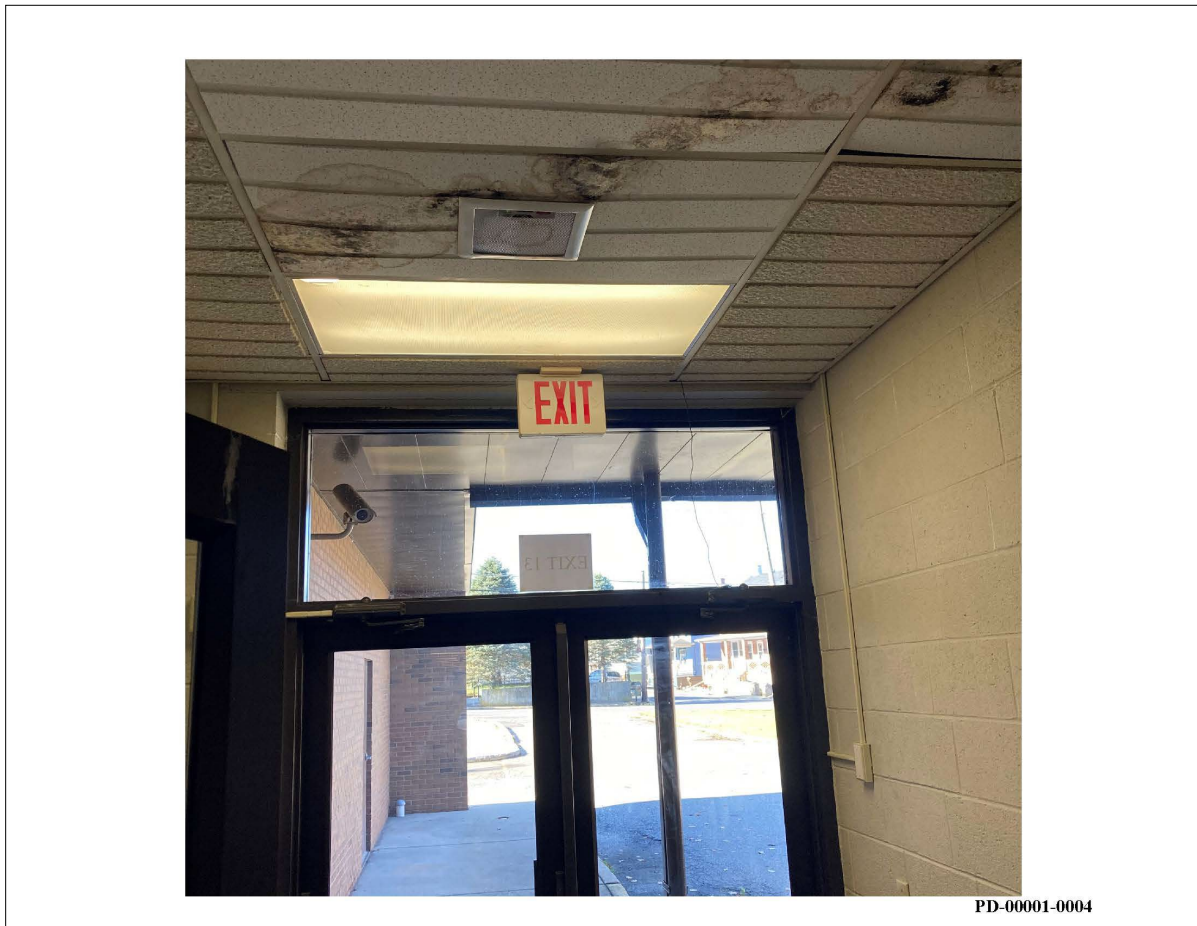
**PD-1-03** depicts the front entrance of Panther Valley School District's elementary school, where the floor has worn and ripped over time to create a tripping hazard.

Tr. 786:13-24 (McAndrew). This accurately depicts the conditions at Panther Valley School District's elementary school today. Tr. 787:1-4 (McAndrew).



PD-00001-0003

**PD-1-04** depicts a typical hallway in Panther Valley School District's elementary school. Tr. 788:18-789:3 (McAndrew). This hallway ceiling is stained with water damage caused by a roof leak, which caused Panther Valley to frequently test for mold. *Id.* This accurately depicts a typical Panther Valley elementary school hallway today. Tr. 788:22-23 (McAndrew).





**PD-1-05** depicts the pump system outside of Panther Valley School District's elementary school, which is used to prevent rainwater from seeping in and flooding classrooms when it rains. Tr. 789:6-790:3 (McAndrew). This accurately depicts the condition at Panther Valley School District's elementary school today. Tr. 789:16-19 (McAndrew).



**PD-1-06** depicts the outside of the Panther Valley School District elementary school building, which is coated with mold. Tr. 790:7-19 (McAndrew). This image also shows broken screens lying alongside the building, as well as the poor drainage system adjacent to the building. Tr. 790:14-19 (McAndrew). This accurately depicts the condition outside of Panther Valley School District's elementary school today. Tr. 790:20-23 (McAndrew).



PD-00001-0006

**PD-1-07** depicts an outside wall of Panther Valley School District elementary school, which is coated in mold. Tr. 791:2-13 (McAndrew). This accurately depicts the condition outside of Panther Valley School District's elementary school today. Tr. 791:14-17 (McAndrew).



PD-00001-0007

**PD-1-08** depicts an open ceiling, which has lost damaged ceiling tiles and is stained by water, at Panther Valley School District's elementary school. Tr. 791:20-792:4 (McAndrew). This accurately depicts the typical conditions of the ceilings at Panther Valley School District's elementary school today. Tr. 792:5-8 (McAndrew).



PD-0001-0008

**PD-1-09** depicts the handicap ramp outside of Panther Valley School District's elementary school, which is deteriorated and crumbling. Tr. 792:11-20 (McAndrew). This is an accurate representation of the of the ramp at Panther Valley School District today. Tr. 792:21-24 (McAndrew).



PD-0001-0009

**PD-1-10** depicts the trailers at Panther Valley School District's elementary school. Tr. 793:4-10 (McAndrew). This is an accurate representation of the conditions at Panther Valley elementary school. Tr. 793:11-14 (McAndrew).



PD-00001-0010

**PD-1-11** depicts additional deteriorating trailers at Panther Valley School District's elementary school. Tr. 793:18-794:3 (McAndrew). The picture also depicts the playground in the background, which Panther Valley School District funded with community resources and grants. Tr. 793:24-794:3 (McAndrew). This is an accurate representation of the conditions at Panther Valley School District elementary school. Tr. 793:11-14 (McAndrew).

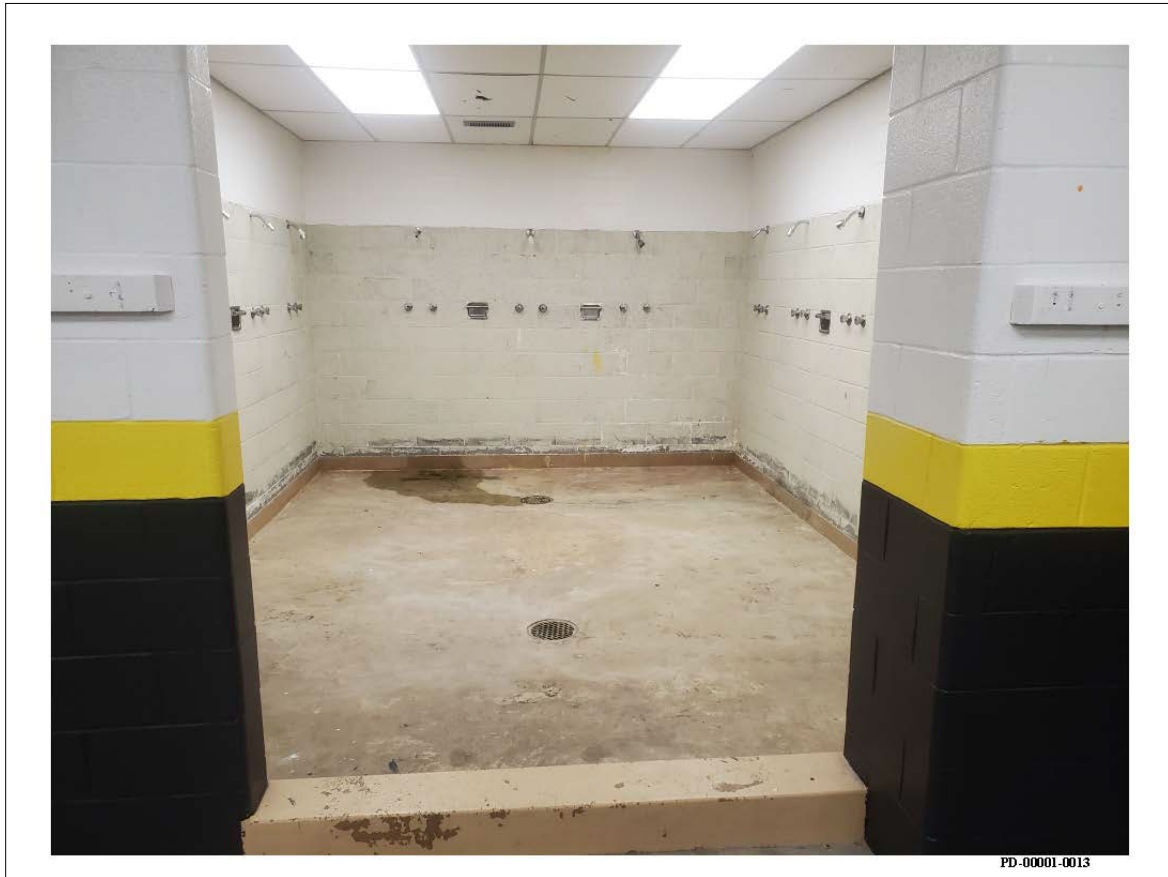


**PD-1-12** depicts a high school classroom, with a partially detached light fixture and partially exposed ceiling, in Panther Valley School District's junior-senior high school. Tr. 794:8-20 (McAndrew). This classroom is an accurate representation of the typical classroom for 9th through 12th graders at Panther Valley School District today. Tr. 794:15-20 (McAndrew).





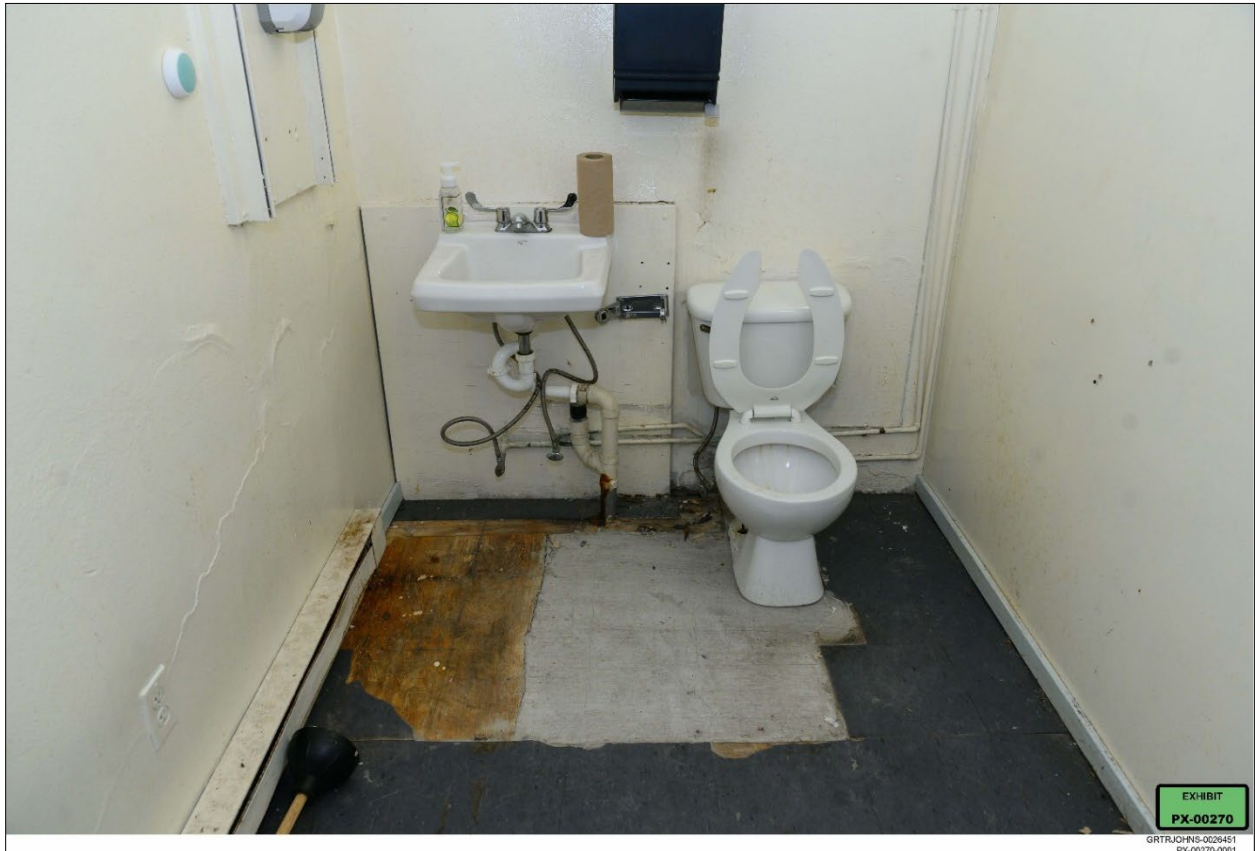
**PD-1-13** depicts the high school shower area at Panther Valley School District. Tr. 794:21-795:2 (McAndrew) These showers are no longer functional. Tr. 795:1-2 (McAndrew). This is an accurate representation of the high school showers at Panther Valley today School District. Tr. 795:3-5 (McAndrew).



**PD-1-14** depicts the Panther Valley high school locker room. Tr. 795:6-10 (McAndrew). This is an accurate representation of the conditions of the high school locker room today. Tr. 795:9-10 (McAndrew).



**PX-270** depicts a middle school bathroom in Greater Johnstown School District's Garfield Middle School. Tr. 2672:7-12 (Arcurio). This depicts the conditions of the bathroom as it existed when Garfield Middle School students used these facilities; the middle school has since been closed. Tr. 2672:19-22 (Arcurio).



PX-276 depicts a deteriorated ceiling and above the stairwell at Garfield Middle School in Greater Johnstown School District. Tr. 2675:5-2676:1 (Arcurio). The ceilings at Greater Johnstown School District often eroded and collapsed because persistent pipe leaks would saturate the ceiling tiles. Tr. 2675:8-2676:1 (Arcurio). This photo depicted the conditions of the school when students were present. Tr. 2675:19-2676:1 (Arcurio).



**PX-280** depicts a single-toilet bathroom in the elementary school at Greater Johnstown School District. Tr. 3303:17-Tr. 3304:24 (Kobal). This toilet serves 125 first-graders elementary students and is the only restroom on the floor. Tr. 3303:20-Tr. 3304:3 (Kobal). Because this is the only facility, students have occasionally have accidents in the hallway due to long lines and the restroom regularly becomes “disgusting” by early afternoon due to students’ inability to properly use the restroom properly. Tr. 3305:9-3306:21 (Kobal). This photo depicts the current conditions of the school. Tr. 3304:14-16 (Kobal).



**PX-282** depicts students learning in a cinderblock storage room without windows or ventilation, which has been converted into a classroom in Greater Johnstown School District. Tr. 2648:20-2651:22 (Arcurio). This photo depicts the conditions of the elementary school as students learn. Tr. 2650:23-2651:4 (Arcurio).



**PX-296** depicts a library at Greater Johnstown School District middle school that was repurposed as a storage area. Tr. 2682:2-11 (Arcurio). The district decided to utilize Greater Johnstown School District's part-time librarian as a reading teacher and cannot afford to hire additional librarians. Tr. 2683:11-2684:9 (Arcurio). Because the school is repurposed from an elementary school to a middle school, the individual classrooms require more space for seating older students; teachers have had to rely on alternative storage places, like this library, for their classroom materials. Tr. 2684:18-2685:16 (Arcurio).



PX-396 depicts Hamilton Elementary School in the School District of Lancaster.

Tr. 5796:3-6 (Przywara).





**PX-402** depicts a ceiling at Hamilton Elementary School in the School District of Lancaster, which is stained brown and deteriorated because of long-term water damage caused by a roof leak. Tr. 5796:17-5797:18 (Przywara). The roof at Hamilton has been repaired, but this represents recurring concerns in Hamilton and through schools in Lancaster. Tr. 5797:22-5798:8 (Przywara).



**PX-405** depicts a classroom ceiling, which is stained brown and deteriorated from long-term water damage caused by a roof leak, at Hamilton Elementary School in the School District of Lancaster. Tr. 5796:18-5797:18 (Przywara). This image also depicts trashcans on the floor to collect water dripping into the classroom as a result of roof leaks and ceiling damage. Tr. 5797:9-18 (Przywara). Because there were no additional spaces in the building, students would learn in the classroom as water dripped through the roof. Tr. 5796:20-5796:18 (Przywara). The roof at Hamilton has been repaired since the time of this photo, but this is representative of the recurring concerns in Hamilton and other schools in Lancaster. Tr. 5797:22-5798:8 (Przywara).



PX-422 depicts a 3rd grade classroom with 28 students at Hamilton Elementary School in the School District of Lancaster. Tr. 5798:11-5799:3 (Przywara). This image accurately represents the typical classroom in Hamilton Elementary School, which currently has over an average class size ratio of 25 students to 1 teacher. Tr. 5799:4-9 (Przywara).



**PX-427** depicts a teacher educating students in a hallway at Hamilton Elementary School in the School District of Lancaster. Tr. 5779:12-5800:12 (Przywara). This teacher permanently provides instruction to students in the hallway for the full school year. Tr. 5800:1-12 (Przywara). Teachers continue to use hallways as learning spaces today. Tr. 5800:13-5801:2 (Przywara).



**PX-455** depicts Price Elementary School in the School District of Lancaster. Tr.  
5801:21-24 (Przywara).



**PX-488** depicts the open concept classroom in Price Elementary School in the School District of Lancaster, which has classrooms created out of dividers instead of walls. Tr. 5802:3-5803:13 (Przywara). In this image, one classroom of students is behind the shorter divider and another classroom of students is behind the two adults standing in the “hallway.” Tr. 5802:5-5803:13 (Przywara). The full-length “curtain wall” was installed in the 1970s, one of many in the school, many of which are non-functional. Tr. 5802:22-5803:5 (Przywara). This photo depicts the current conditions at Price Elementary School. Tr. 5803:14-17 (Przywara).



**PX-500** depicts water bottles that Price Elementary School in the School District of Lancaster had to provide students after discovering that school pipes contaminated the drinking water with lead. Tr. 5803:20-5804:15 (Przywara). Price Elementary had to provide bottles to students every day for a year. Tr. 5804:11-15 (Przywara). The school has temporarily fixed this problem by installing filters on the water fountains and more regularly testing for lead, but the pipes still exist in the school today. Tr. 5804:16-5805:16 (Przywara).



**PX-518** depicts the exterior of Martin Luther King, Jr. Elementary School in the School District of Lancaster. Tr. 5793:1-5 (Przywara).





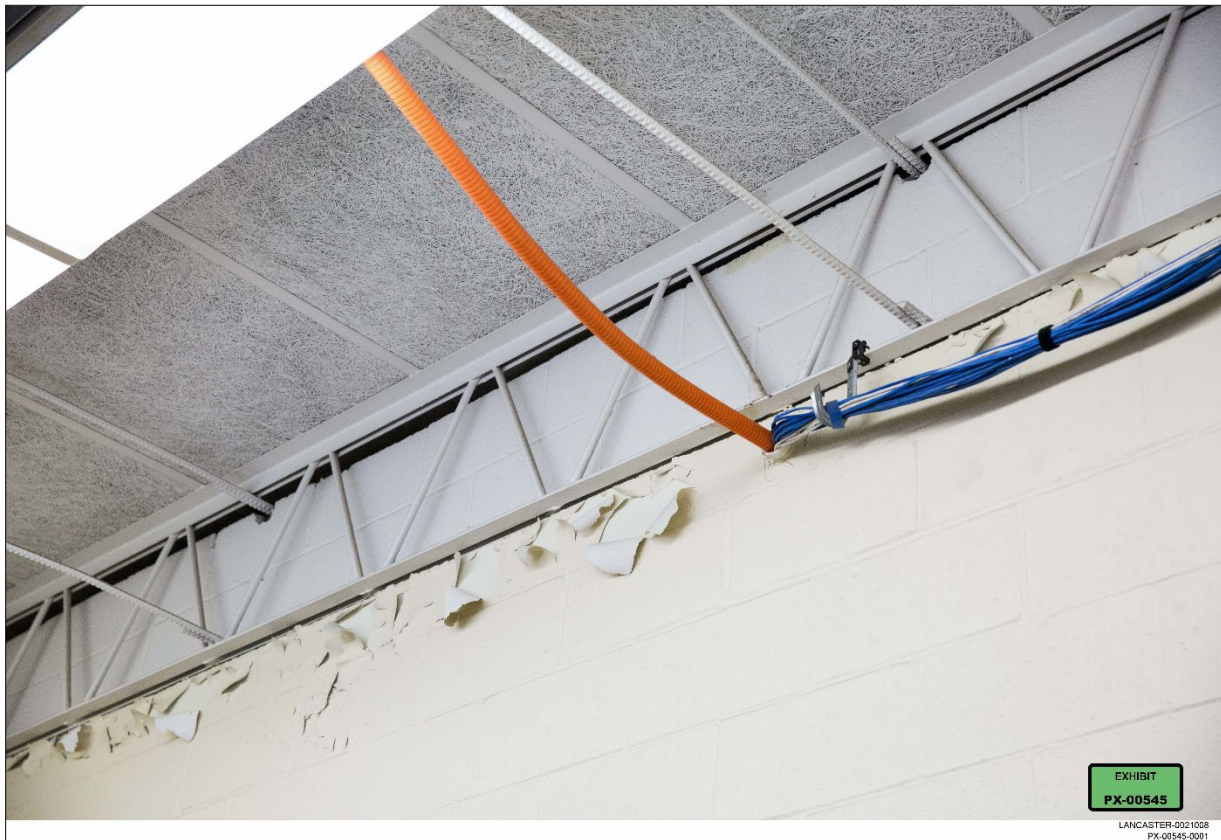
**PX-538** depicts mildewed classroom trailers at King Elementary in the School District of Lancaster, which the school uses because it does not have adequate space to educate the students that attend. Tr. 5793:8-24 (Przywara). This accurately represents the conditions of the trailers at King Elementary today. Tr. 5794:1-3 (Przywara).



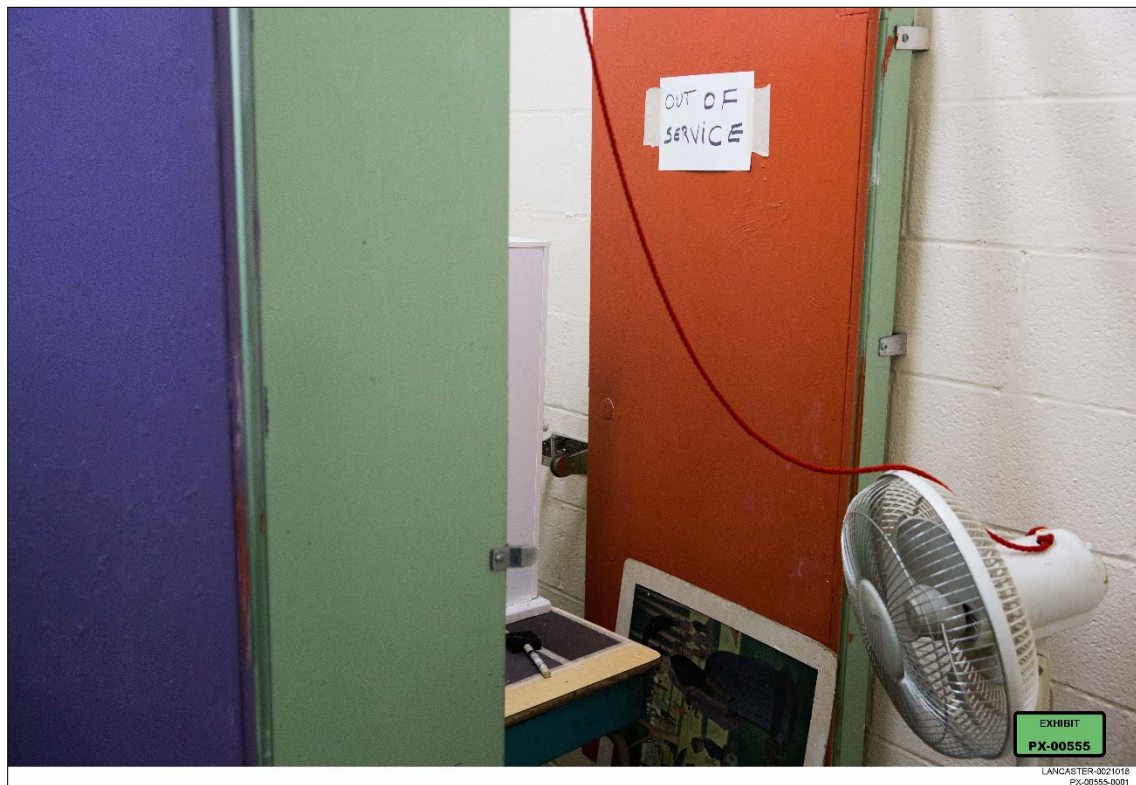
**PX-539** depicts weather damage and mildew covering classroom trailers at King Elementary in the School District of Lancaster, which the school uses because it does not have adequate space to educate the students that attend. Tr. 5791:13-24 (Przywara). This accurately represents the conditions of the trailers at King Elementary today. Tr. 5794:1-3 (Przywara).



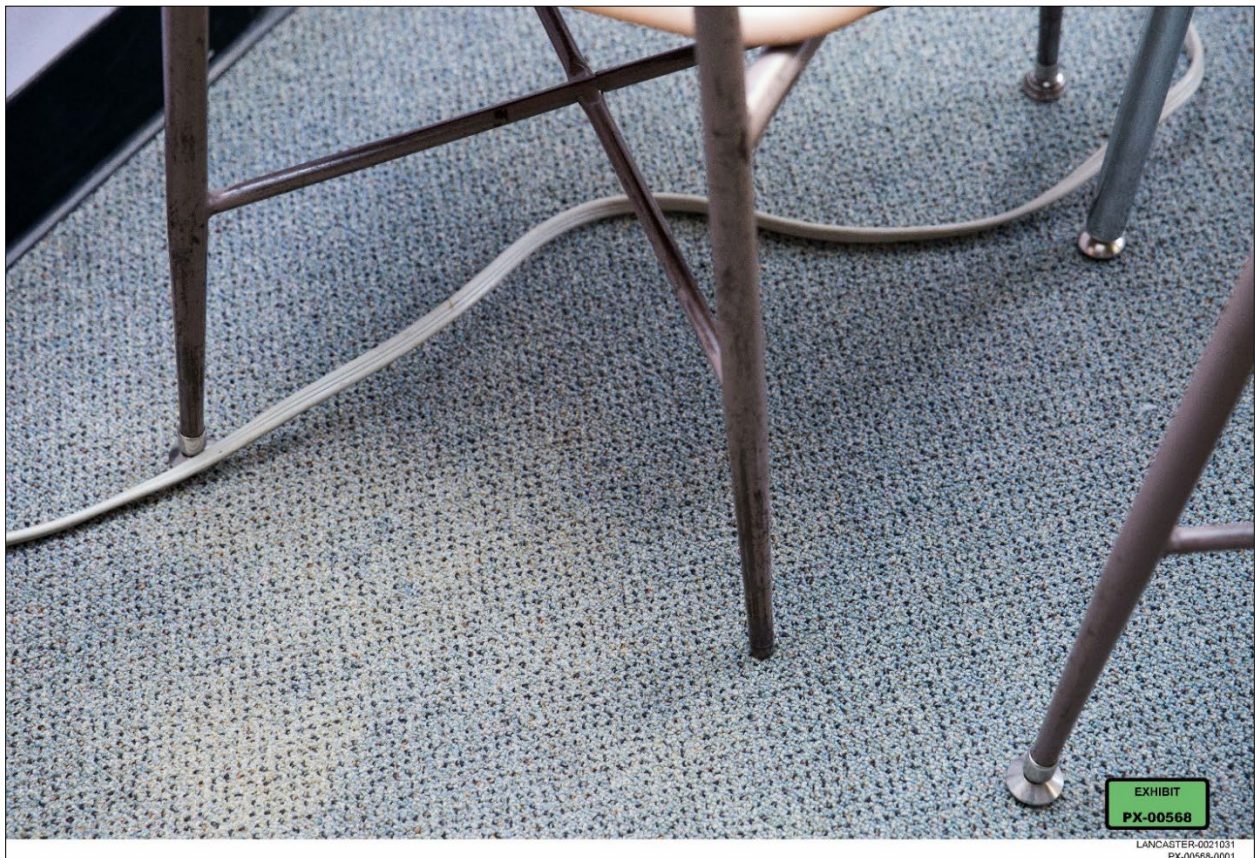
**PX-545** depicts the top of the walls of the music room at King Elementary School in the School District of Lancaster. Tr. 5794:6-16 (Przywara). This image shows the layers of paint that have peeled due to moisture damage and the exposed wires used for school technology. Tr. 5794:8-16 (Przywara). This accurately reflects the current conditions at King Elementary. Tr. 5794:17-20 (Przywara).



**PX-555** depicts restrooms at King Elementary in the School District of Lancaster, with one stall out of service and with a fan to compensate for a lack of ventilation. This is near the music room, which was constructed out of old locker rooms. Tr. 5794:23-5795:16 (Przywara). These conditions accurately reflect the restrooms at King Elementary today. Tr. 5795:15-17 (Przywara).



**PX-568** depicts a typical classroom at King Elementary School in the School District of Lancaster, with an extension cord running through the class and under student desks creating a tripping hazard. Tr. 6038:24-6039:10. (Aikens). This hazard exists in every classroom at King Elementary School. Tr. 6039:11-13 (Aikens). This is an accurate representation of King Elementary classrooms today. Tr. 61039:14-17 (Aikens).



**PX-573** depicts the interior of bathroom stall at King Elementary School in the School District of Lancaster, which has exposed rust corroding a large portion of the stall walls. Tr. 6036:22-6037:11 (Aikens). This is an accurate depiction of the current condition of the school's bathroom. Tr. 6037:8-11 (Aikens).



**PX-583** depicts the outside of Wickersham Elementary School in the School District of Lancaster. Tr. 5777:10-15 (Przywara).



**PX-585** depicts the outside of Wickersham Elementary School in the School District of Lancaster, which has mold and peeling paint along the roofline. Tr. 5778:4-11 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).





**PX-589** depicts the gymnasium at Wickersham Elementary School in the School District of Lancaster, which has moisture damage and peeling paint along the roofline as well as mildew coating the cement. Tr. 5778:17-5779:6 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).



**PX-594** depicts a classroom trailer outside of Wickersham Elementary in the School District of Lancaster, which has rotted along the bottom of the trailer and the staircase. Tr. 5781:14-5782:14 (Przywara). Wickersham has since been renovated, but these trailers were typical and in use for several years prior to the renovations. Tr. 5781:17-5782:14 (Przywara).



**PX-597** is a close-up depiction of the rotting, rust and mildew along the skirt of a classroom trailer outside of Wickersham Elementary in the School District of Lancaster. Tr. 5781:14-5782:14 (Przywara). Wickersham has since been renovated, but these trailers were typical and in use for several years prior to the renovations. Tr. 5781:17-5782:14 (Przywara).



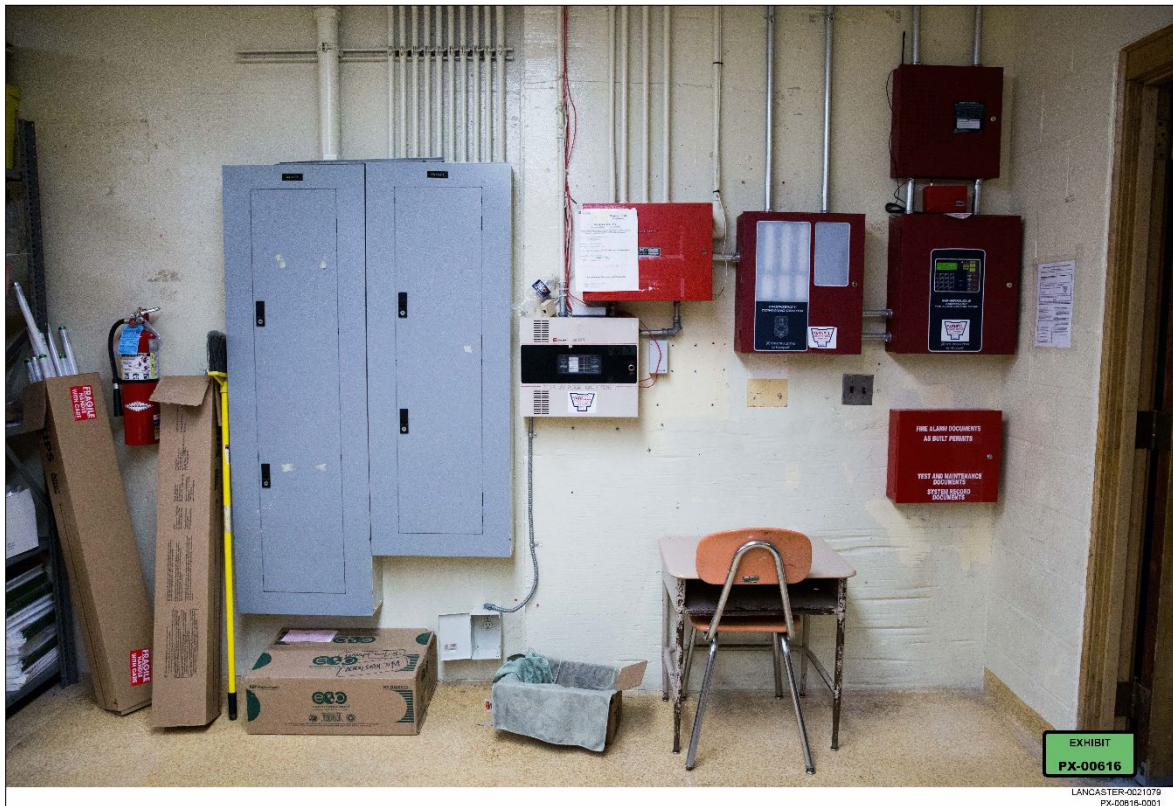
**PX-605** depicts the outdated technology and computers available at Wickersham Elementary in the School District of Lancaster in March 2020, just before the COVID pandemic, which were largely not in use because they were outdated. Tr. 5780:12-22 (Przywara). This photo was taken in the basement of Wickersham, which was converted into a library because the school did not have the room to make a library on the main floors. Tr. 5780:23-5781:6 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).



**PX-614** depicts a classroom learning space for kindergartners in the basement of Wickersham Elementary School in the School District of Lancaster, which also serves as a storage space for supplies. Tr. 5784:4-16 (Przywara). Students used this as their daily classroom. Tr. 5784:4-16 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).



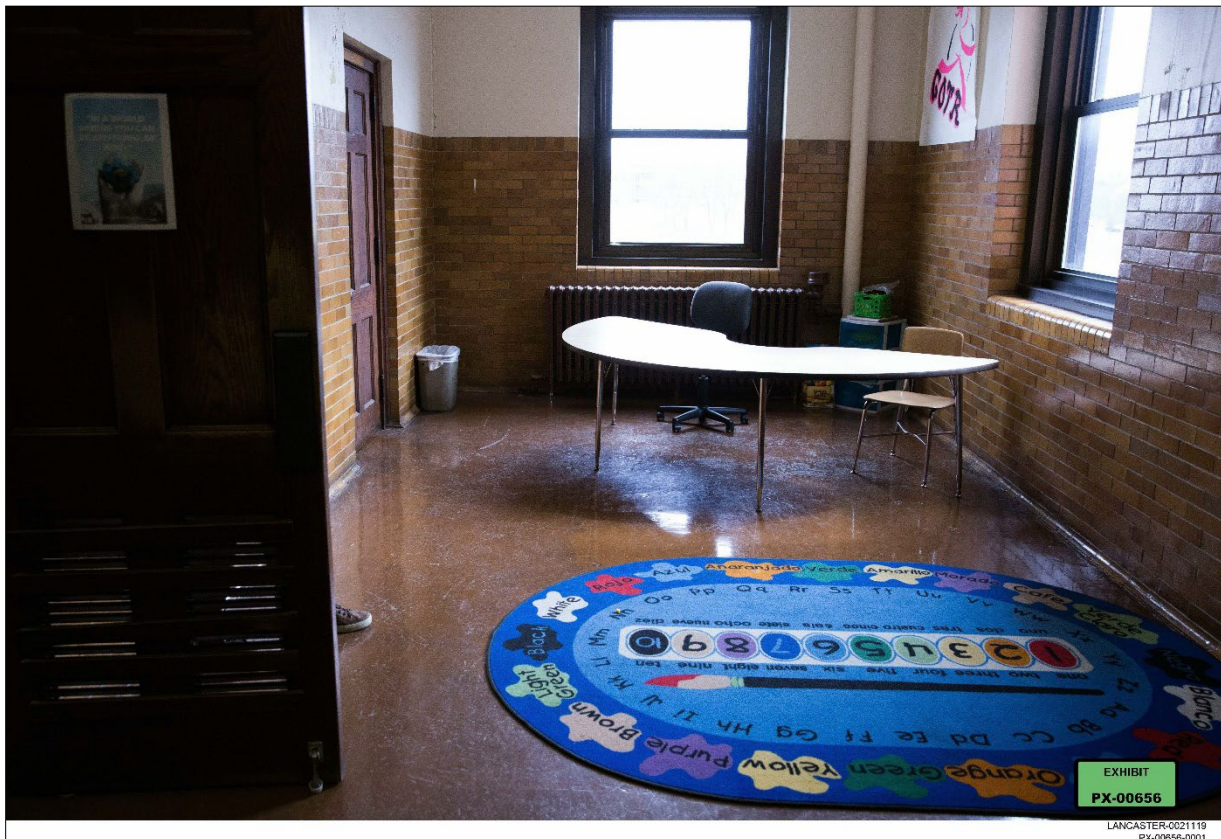
**PX-616** depicts a student desk, which was used for individual work or one-on-one instruction at Wickersham Elementary School in the School District of Lancaster, positioned between various electrical panels and alarm system. Tr. 5784:19-5785:9 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).



**PX-622** depicts the bathroom at Wickersham Elementary in the School District of Lancaster, where many stalls do not have doors for privacy. Instead of recreating the entire bathroom, staff constructed makeshift plywood doors of exhibit. Tr. 5779:15-5780:3 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).



**PX-656** depicts a hallway at Wickersham Elementary in the School District of Lancaster where teachers would provide individual reading or math interventions. Tr. 5782:23-5783:14 (Przywara). Wickersham Elementary did not have the adequate space or facilities to otherwise provide small group interventions. Tr. 5783:1-14 (Przywara). The state of Wickersham ultimately required the district to renovate the building. Tr. 5776:12-5777:6 (Przywara).

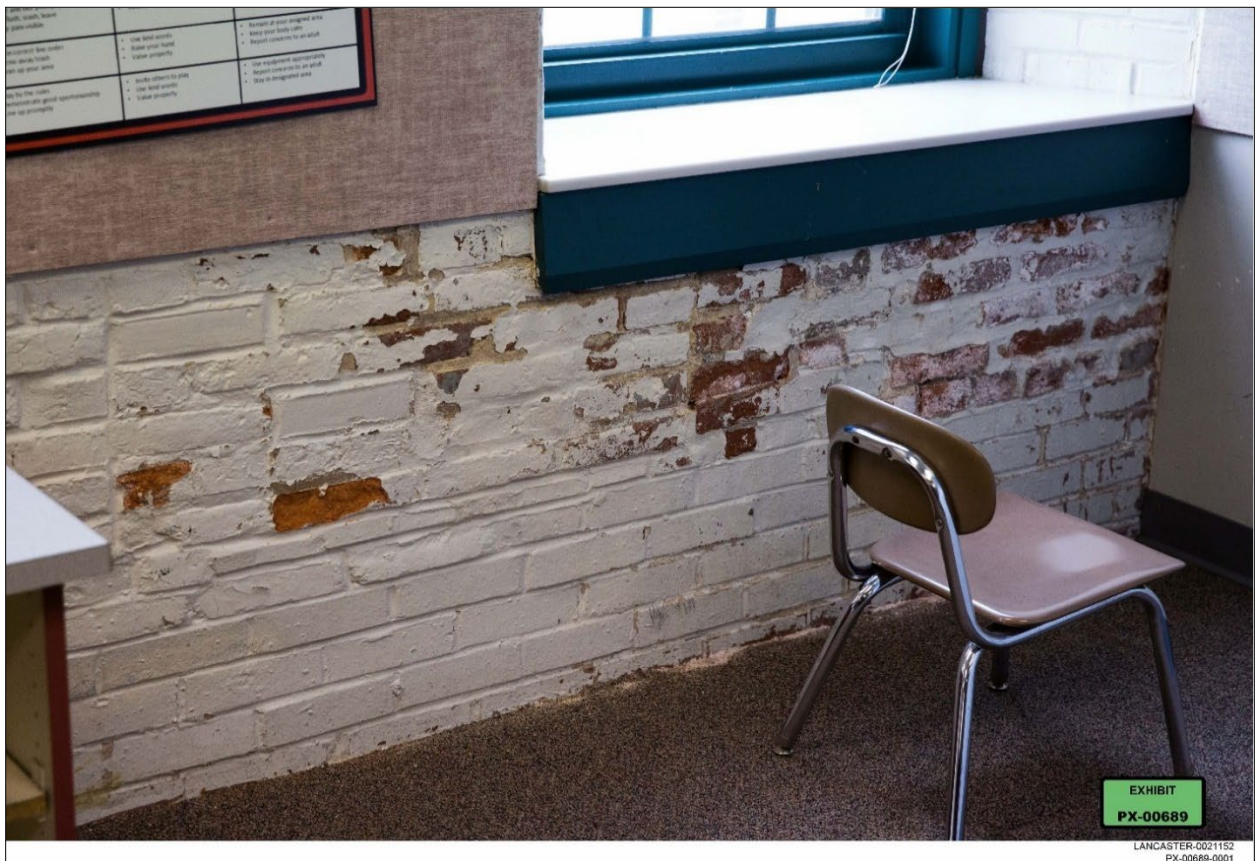




**PX-685** depicts the exterior of Carter & MacRae Elementary School at the School District of Lancaster. Tr. 5787:21-5788:3 (Przywara).



**PX-689** depicts a classroom at Carter & MacRae Elementary School in the School District of Lancaster in which paint is peeling and the brick wall is deteriorating due to moisture control problems. Tr. 5788:6-15 (Przywara). This is an accurate representation of the conditions at Carter & MacRae today. Tr. 5788:16-19 (Przywara).



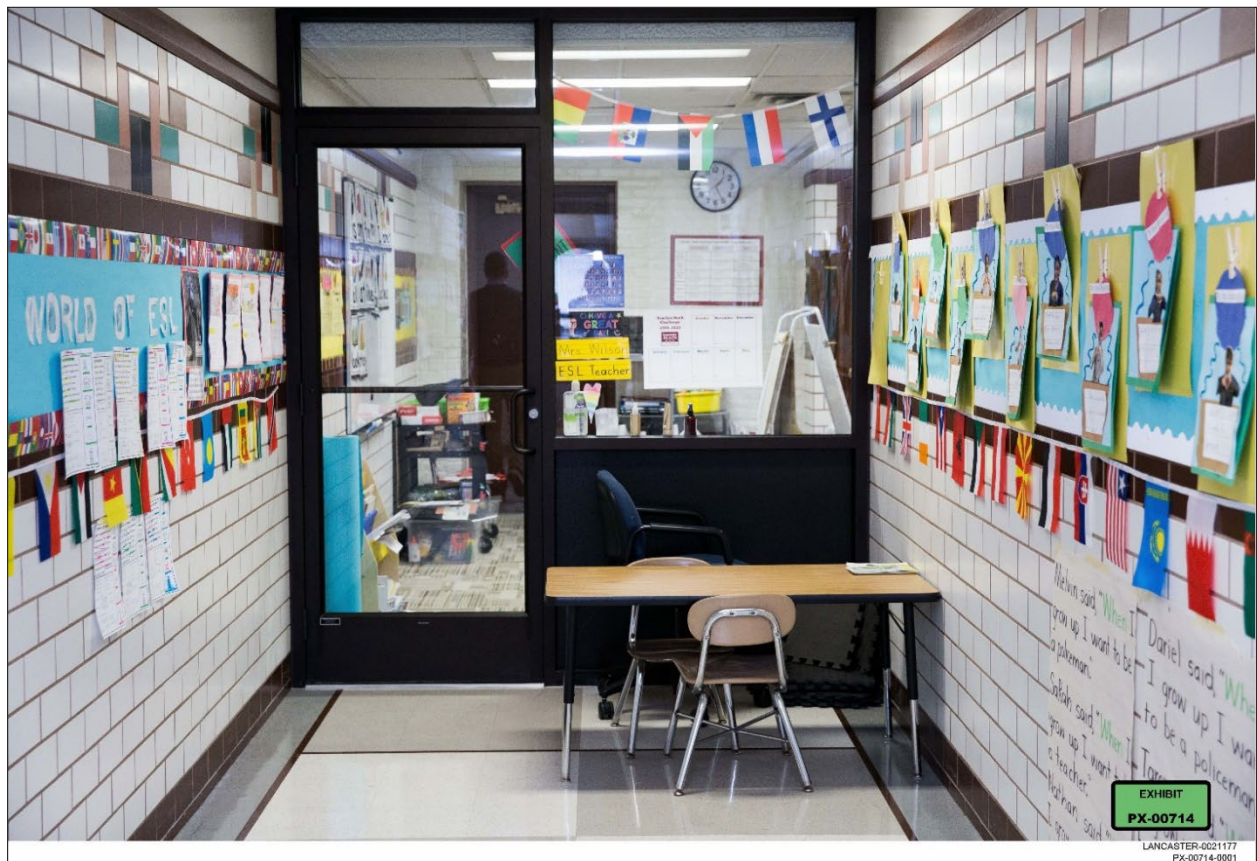
PX-691 depicts support staff working providing one-on-one instruction to a student in the small space to the side of a hallway at Carter & MacRae Elementary School in the School District of Lancaster. Tr. 5791:23-5792:11 (Przywara). This is an accurate representation of Carter & MacRae today. Tr. 5792:12-15 (Przywara).



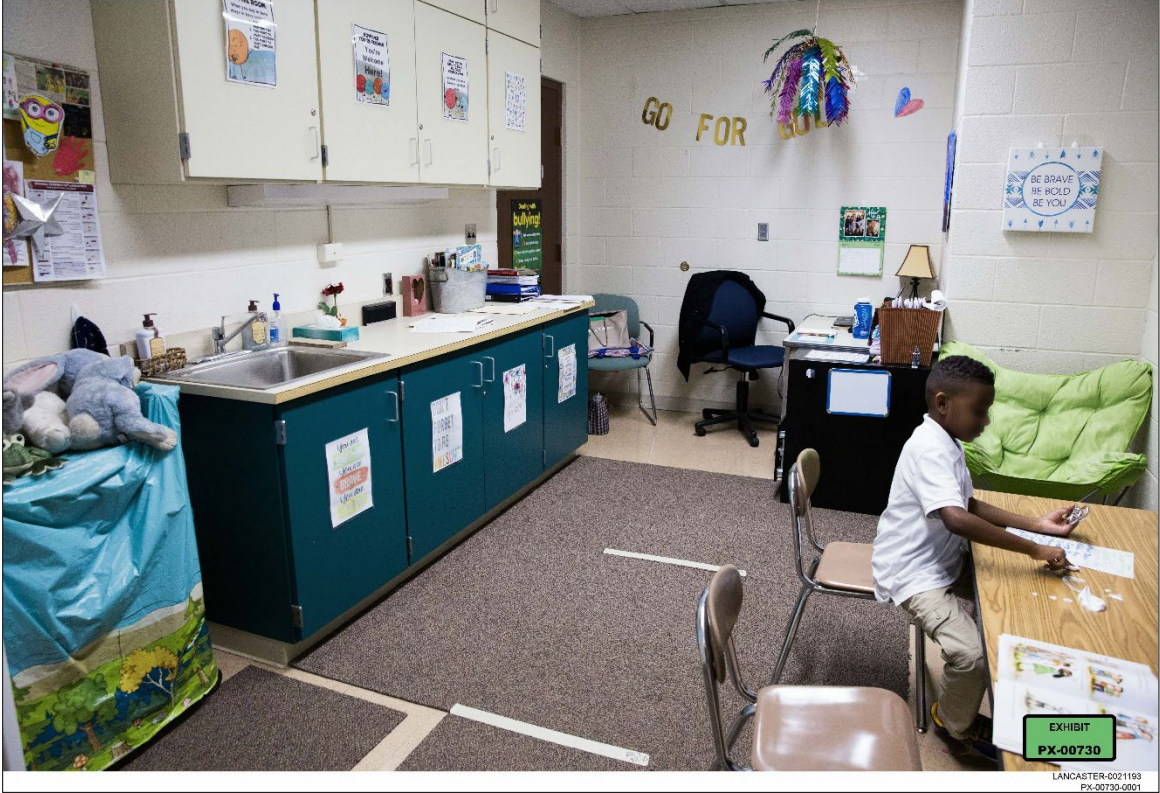
**PX-694** depicts a corner of a special education classroom where staff have tried to obscure moisture bubbles in the wall by repainting the corner and covering with various elements at Carter & Macrae Elementary School in the School District of Lancaster. Tr. 5788:23-5789:11 (Przywara). This is an accurate representation of Carter & MacRae today. Tr. 5789:12-14 (Przywara).



PX-714 depicts a hallway on the second floor of Carter & MacRae Elementary in the School District of Lancaster which the school converted into a room for small group instruction by erecting a storefront glass, as well as a small table outside for additional learning space. Tr. 5789:17-5790:18 (Przywara). This is an accurate representation of Carter & MacRae today. Tr. 5790:19-22 (Przywara).



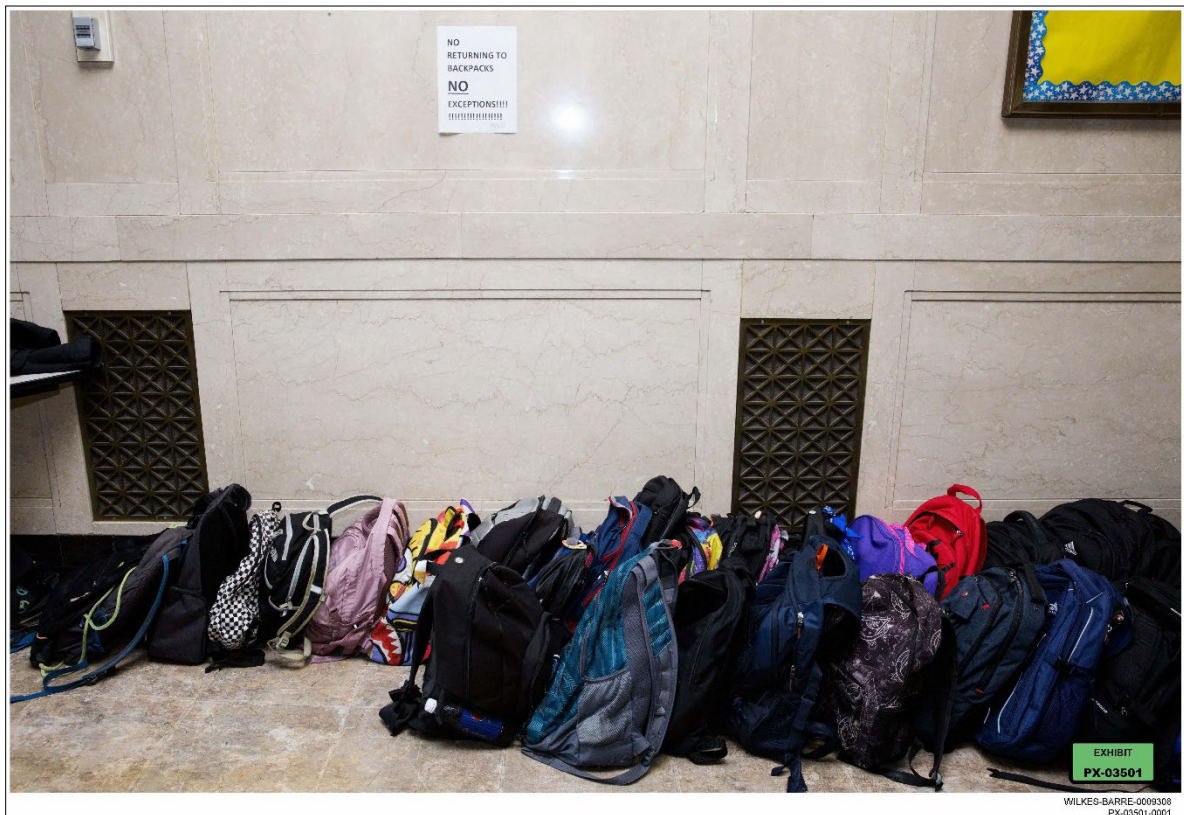
**PX-730** depicts a former nursing suite that Carter & MacRae Elementary in the School District of Lancaster converted into a makeshift classroom for small group social-emotional learning interventions. Tr. 5791:1-16 (Przywara). This accurately depicts the conditions at Carter & MacRae today. Tr. 5791:17-20 (Przywara).



**PX-3497** depicts Meyers High School, in Wilkes-Barre Area School District, with fencing around the perimeter to protect students and pedestrians from being struck by eroding masonry and debris. Tr. 10696:15-10697:6 (Costello). At the top of the exterior wall, there is a black band, nicknamed the “Black Band-Aid,” which the school installed to support the parapet before it began eroding, however ultimately was unable to resolve safety concerns. Tr. 10697:7-18 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello); 10696:19-20 (Costello).

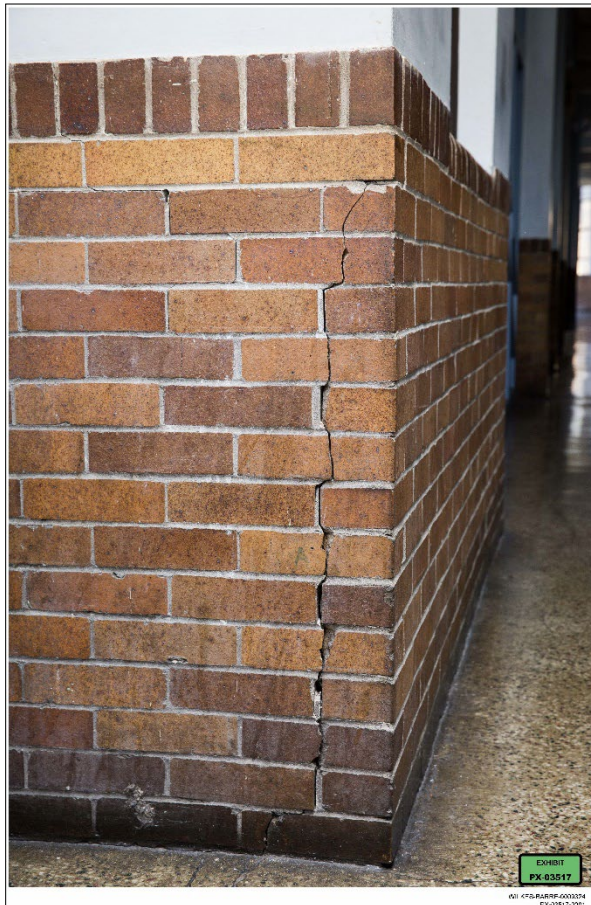


**PX-3501** depicts student backpacks lined up within the front lobby of Meyers High School in Wilkes-Barre Area School District because Meyers did not have working lockers, lockers did not have doors, and the district at the time did not allow students to access bags during the day. Tr. 10701:7-21 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello); 10696:19-20 (Costello).

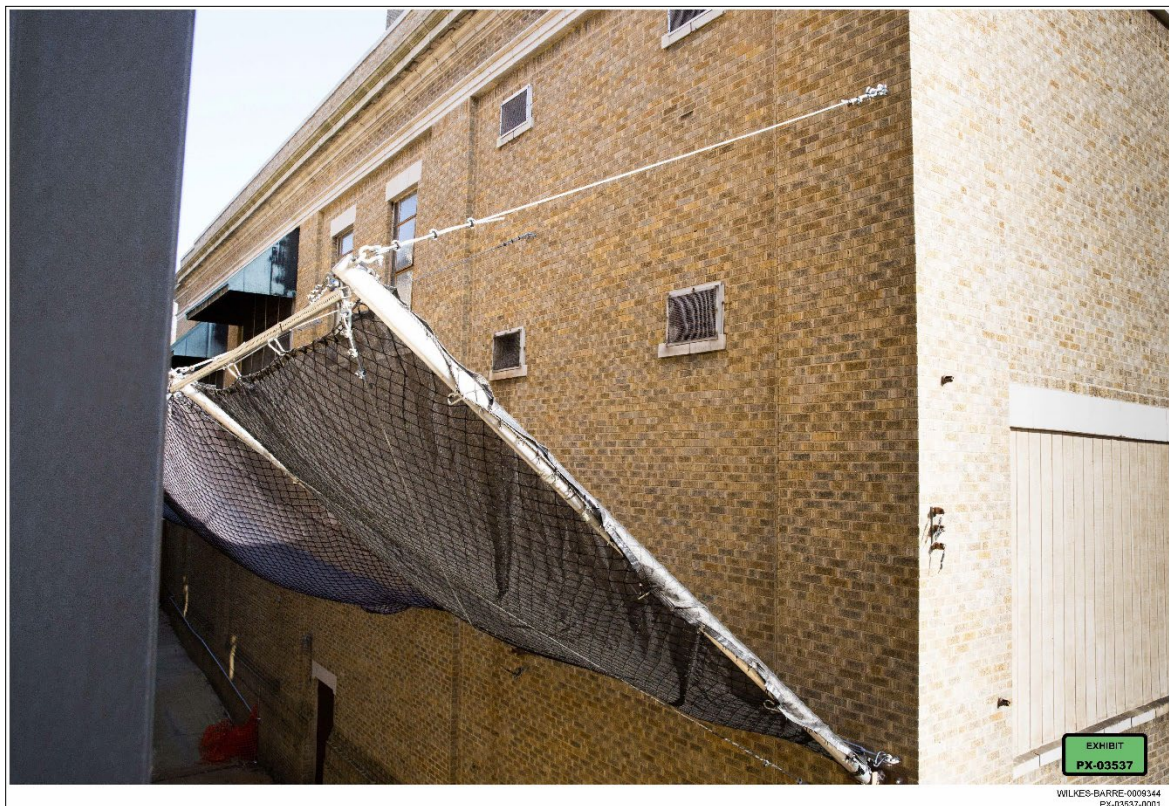




**PX-3517** depicts stress cracks in the wall at Meyers High School in Wilkes-Barre Area School District, which occurred because the building foundation shifted 12 inches over time. Tr. 10702:1-10703:7 (Costello). This shift created twisting within the building, and was exacerbated by water flowing into the building due to cracks which the district could not seal. Tr. 10702:4-24 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9; 10696:19-20 (Costello).



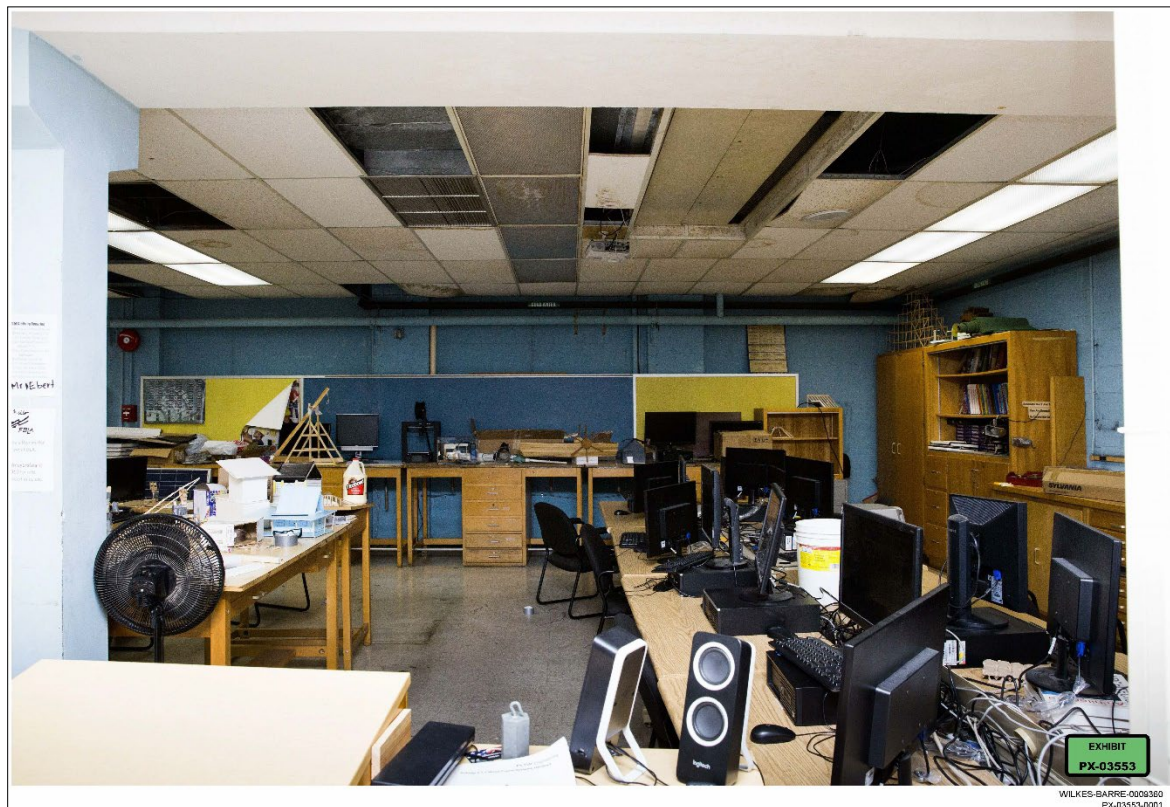
**PX-3537** depicts a safety net, which was installed at Meyers High School in Wilkes-Barre Area School District, to protect students, pedestrians, and vehicles from loose debris which was falling from the building's unmaintained parapet. Tr. 10708:21-10709:21 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9; 10696:19-20 (Costello).



**PX-3545** depicts the outside of the cafeteria at Meyers High School in Wilkes-Barre Area School District. This area previously housed bleachers attached to the metal frames, but, after machinery fell through the concrete walkway now enclosed by the second-floor fence, an inspection revealed that steel in that area was severely delaminating and the entire structure could collapse, requiring the school to remove the bleachers. Tr. 10710:4-10711:24 (Costello). Above the furthest right point of the second-story fence is a piece of stonework which has deteriorated, cracked and fallen. Tr. 10712:10-23 (Costello). The black fencing is a protective shed that had to be installed to protect students from such debris. Tr. 10712:1-9 (Costello). Wilkes-Barre has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello); 10696:19-20 (Costello).



**PX-3553** depicts the STEM Academy at Meyers High School in Wilkes-Barre Area School District. Tr. 10713:17-10715:6 (Costello). This image also shows a bucket on the table among the wires, which was used to collect water dripping from the ceiling as a result of a leak that the school could not seal. Tr. 10714:10-17 (Costello). The ceilings of the room are deteriorated and stained from water damage. Tr. 10714:1-22 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello); 10696:19-20 (Costello).



**PX-3559** depicts a makeshift STEM classroom at Meyers High School in Wilkes-Barre Area School District, which was converted from a mechanical room into a classroom. Tr. 10715:11-22 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9; 10696:19-20 (Costello).



**PX-3562** depicts a wall within the STEM area of Meyers High School in Wilkes-Barre Area School District that has shifted and twisted because of the building's structural movement. Tr. 10716:10-10717:20 (Costello). Engineers inspecting Meyers High School identified this as an area of great concern. Tr. 10716: 15-10717:3 (Costello). The door in the bottom of the image does not entirely close because the building's shifting structure caused the door frame to change shape. Tr. 10717:4-16 (Costello). Wilkes-Barre has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello); 10696:19-20 (Costello).



**PX-3564** depicts the underside of a crosswalk that students would use to travel from the Meyers High School auditorium in Wilkes-Barre Area School District to the cafeteria. Tr. 10718:1-24 (Costello). The erosion and delamination affecting the steel supports eventually forced the school to close the walkway due to concerns that the crosswalk would collapse. Tr. 10718:5-24 (Costello). Wilkes-Barre Area School District has since closed Meyers High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9; 10696:19-20 (Costello).



**PX-3581** depicts James Coughlin High School in Wilkes-Barre Area School District. Tr. 10719:3-9 (Costello). Coughlin High School is no longer operational. Wilkes-Barre Area School District has since closed Coughlin High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello).





**PX-3591** depicts the annex of Coughlin High School in Wilkes-Barre Area School District, which holds two restroom sinks, a file cabinet behind the sinks which are used by the nurse's office and the home and school office, and the guidance counselor's office to the left. Tr. 10719:20-10721:23 (Costello). Wilkes-Barre Area School District has since closed Coughlin High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello).



PX-3607 depicts a door at Flood Elementary, in Wilkes-Barre Area School District. Tr. 10801:5-10 (Costello). This is an accurate representation of Flood Elementary today. Tr. 10820:7-11 (Costello).



EXHIBIT  
PX-03607

WILKES-BARRE-0009414  
PX-03607-0001

**PX-3631** depicts the exterior of Flood Elementary, in Wilkes-Barre Area School District. Tr. 10801:13-10802:1 (Costello). The building's steel is beginning to delaminate and the concrete is beginning to crumble. Tr. 10801:17-10802:1 (Costello). This is an accurate representation of Flood Elementary today. Tr. 10820:7-11 (Costello).



PX-3642 depicts Heights Elementary School in Wilkes-Barre Area School District.

Tr. 10803:15-20 (Costello).



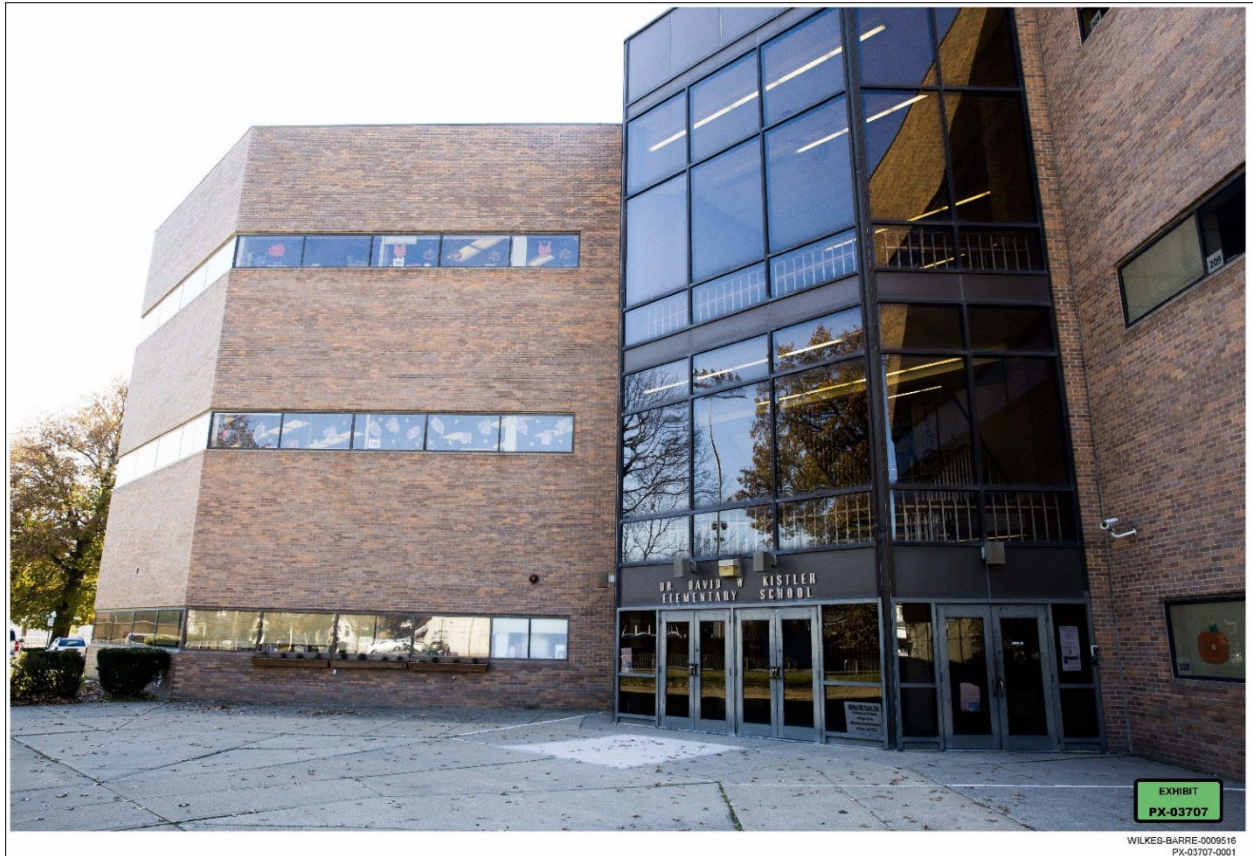
**PX-3660** depicts a bathroom, which has no door and is missing flooring tile, of Heights Elementary in Wilkes-Barre Area School District. Tr. 10803:23-10804:20. While the door has been temporarily repaired, the district has not yet been able to replace the missing flooring tile. Tr. 10804:8-20 (Costello).



**PX-3695** depicts a typical classroom in Heights Elementary School in Wilkes-Barre Area School District. Tr. 10804:23-10806:18 (Costello). The classroom uses mismatched chairs because the district had to repurpose furniture to provide accommodations for students, and because of the large number of students that need to be accommodated, and there is very limited board space for student work. Tr. 10805:3-21 (Costello). There is a child in the classroom wearing a pink winter jacket because the heating and HVAC systems are unable to maintain the proper temperatures during the day. Tr. 10805:22-10806:7 (Costello). This accurately depicts current conditions at Heights Elementary School. Tr. 10820:12-17 (Costello).



PX-3707 depicts the front entrance of Kistler Elementary School. Tr. 10806:21-10807:4 (Costello).



**PX-3715** depicts a typical classroom at Kistler Elementary in Wilkes-Barre Area School District, which has limited space for student seating and very limited board space for the teacher. Tr. 10807:7-10808:3 (Costello). The limited seating and tight space in this room makes it very difficult for educators to provide small group support or one-on-one instruction. Tr. 10807:21-10808:3 (Costello). This accurately depicts current conditions at Kistler Elementary. Tr. 10820:22-10821:2 (Costello).





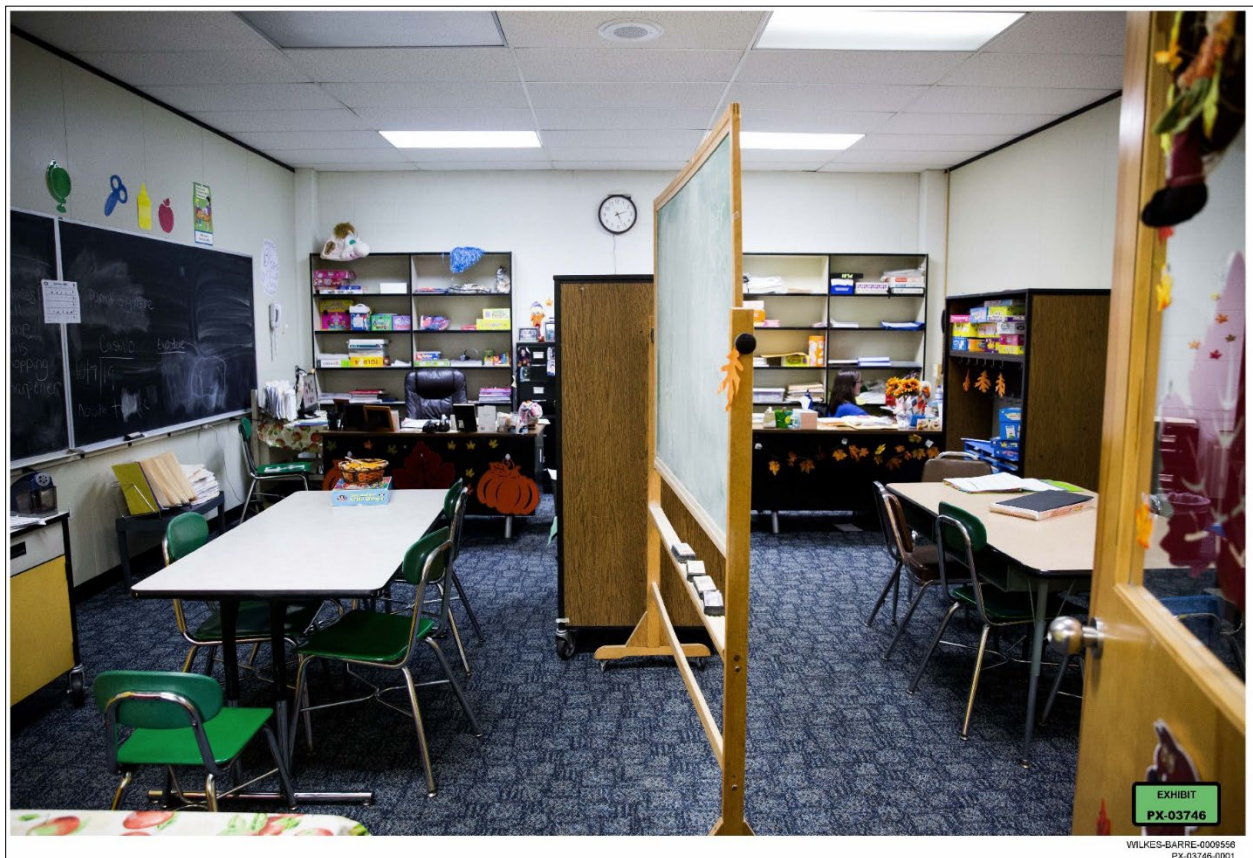
**PX-3728** depicts the band room at Kistler Elementary School in Wilkes-Barre Area School District. Tr. 10808:6-24 (Costello). The ceiling of the room has suffered significant water damage, due to an ongoing, unrepaired roof leak, which disintegrated several ceiling tiles and stained several others. Tr. 10808:10-17 (Costello). The roof at Kistler Elementary has finally been replaced as of this year. Tr. 10808:18-24 (Costello).



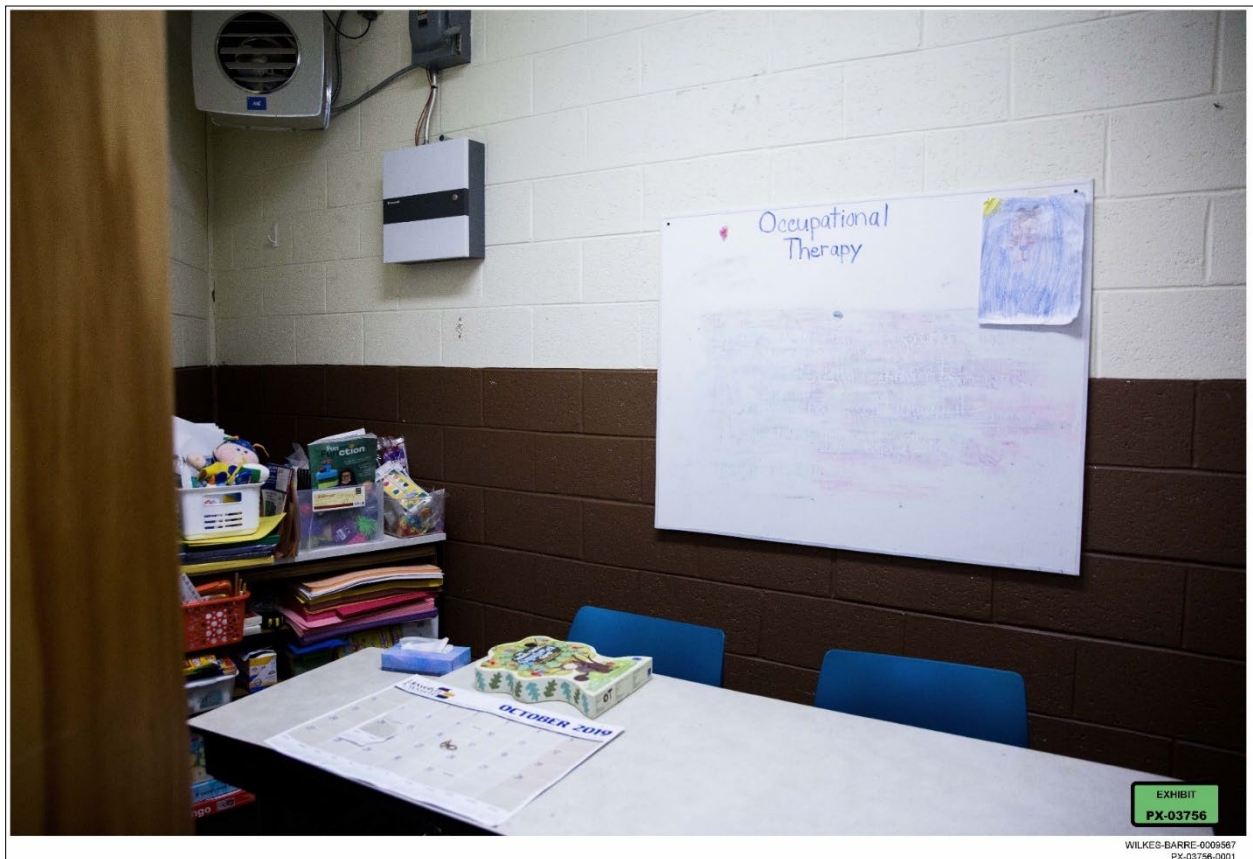
**PX-3729** depicts a settlement crack in the wall that has resulted from shifting in the Kistler Elementary's foundation in Wilkes-Barre Area School District, in a manner similar to those that rendered Meyers High School unusable. Tr. 10809:1-10810:12 (Costello). The ceiling and wall also have slight marks of white spray paint because the school tried to paint over the water damage on ceiling tiles. Tr. 10810:4-12 (Costello). This accurately depicts current conditions at Kistler Elementary. Tr. 10820:22-10821:2 (Costello).



**PX-3746** depicts a small of a classroom at Kistler Elementary in Wilkes-Barre Area School District that the school has attempted to divide into two classrooms with a coat rack and white board. Tr. 10810:15-10811:12 (Costello). At times, the building has two classes of students simultaneously trying to learn in this shared space. Tr. 10810:19-10811:12 (Costello). This accurately depicts current conditions at Kistler Elementary. Tr. 10820:22-10821:2 (Costello).



**PX-3756** depicts a closet that Kistler Elementary in Wilkes-Barre Area School District has converted into a makeshift learning space used by the occupational therapist. Tr. 10811:14-10812:18 (Costello). The occupational therapist must support students from this space because Wilkes-Barre Area School District does not have the funding to renovate the school or create additional space. Tr. 10811:18-10812:18 (Costello). This accurately depicts current conditions at Kistler Elementary. Tr. 10820:22-10821:2 (Costello).



**PX-3769** depicts an office area at Kistler Elementary in Wilkes-Barre Area School District that was converted into a makeshift classroom for students. Tr. 10812:20-10813:15 (Costello). This accurately depicts current conditions at Kistler Elementary. Tr. 10820:22-10821:2 (Costello).



WILKES-BARRE-0009580  
PX-03769-0001

**PX-3798** depicts the natatorium at Kistler Elementary in Wilkes-Barre Area School District, which needs extensive work. Tr. 10813:17-10814:16 (Costello)

The area did not have any heat on the deck, and so the school had to bring in blowers to adequately heat the area for swimmers. Tr. 10813:24-10814: 6 (Costello). The school was additionally unable to properly repair the leaks and cracks in the tiles. Tr. 10814:7-16 (Costello). This accurately depicts current conditions at Kistler Elementary. Tr. 10820:22-10821:2 (Costello).



**PX-3800** depicts a hallway crosswalk between two buildings of Coughlin High School converted into a classroom after one of the buildings was closed due to safety concerns. Tr. 10722:6-10723:11; Tr. 10720:1-12 (Costello). Because it had two window walls and no working heat, it would become extremely cold in the winter, and because of the windows, would become extremely hot in the summer and fall. Tr. 10722:11-24 (Costello). Wilkes-Barre Area School District has since closed Coughlin High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello).



**PX-3802** depicts a chemistry classroom at Coughlin High School in Wilkes-Barre Area School District, which does not have the technology or space needed for students to learn in a working lab. Tr. 10723:16-10724:13 (Costello). Wilkes-Barre Area School District has since closed Coughlin High School due to unsafe conditions and budget constraints. Tr. 10694:7-10695:9 (Costello).





**PX-3814** depicts the front walkway outside of GAR Middle School in Wilkes-Barre Area School District, which is shielded by protective fencing to prevent falling debris from the building's decaying parapet from injuring students and pedestrians. Tr. 10814:24-10815:15 (Costello). This accurately depicts current conditions at GAR Middle School. Tr. 10821:11-15 (Costello).



EXHIBIT  
PX-03814

WILKES-BARRE-0006025  
PX-03814-0001

**PX-3824** depicts a classroom at GAR Middle School in Wilkes-Barre Area School District with extensive water damage from water leaking from the ceiling that has deteriorated several ceiling tiles and caused the plaster to flake off of the column. Tr. 10815:21-10816:15 (Costello). The classroom has buckets positioned underneath the open ceiling to collect dripping water. Tr. 10816:1-15 (Costello). This accurately depicts current conditions at GAR Middle School. Tr. 10821:11-15 (Costello).



**PX-3840** depicts the roof area outside of GAR Middle School in Wilkes-Barre Area School District, which has plastic sheeting protecting the doors and windows of the rooftop access building to prevent water seeping in. Tr. 10816:19-10817:14 (Costello). The school has been unable to fund the proper maintenance required to water-seal this building, and so they have used plywood and plastic as an alternative measure to try and prevent water from seeping in and flooding the floors below. Tr. 10816:23-10817:10 (Costello). This accurately depicts current conditions at GAR Middle School. Tr. 10821:11-15 (Costello).



**PX-3865** depicts the former library at GAR Middle School in Wilkes-Barre Area School District, which has been converted into a makeshift classroom. Tr. 10817:16-10818:11 (Costello). The ceiling has been stained and corroded by water damage due to a roof leak, and therefore is missing ceiling tiles. Tr. 10817:20-10818:8 (Costello). This accurately depicts current conditions at GAR Middle School. Tr. 10821:11-15 (Costello).



**PX-3899** depicts steps outside of GAR Middle School in Wilkes-Barre Area School District, which are crumbling and which has steel delaminating. Tr. 10818:13-10819:2 (Costello). The district has been unable to repair these conditions due to a lack of funds. Tr. 10818:17-10819:2 (Costello).



WILKES-BARRE-0006710  
PX-03899-0001

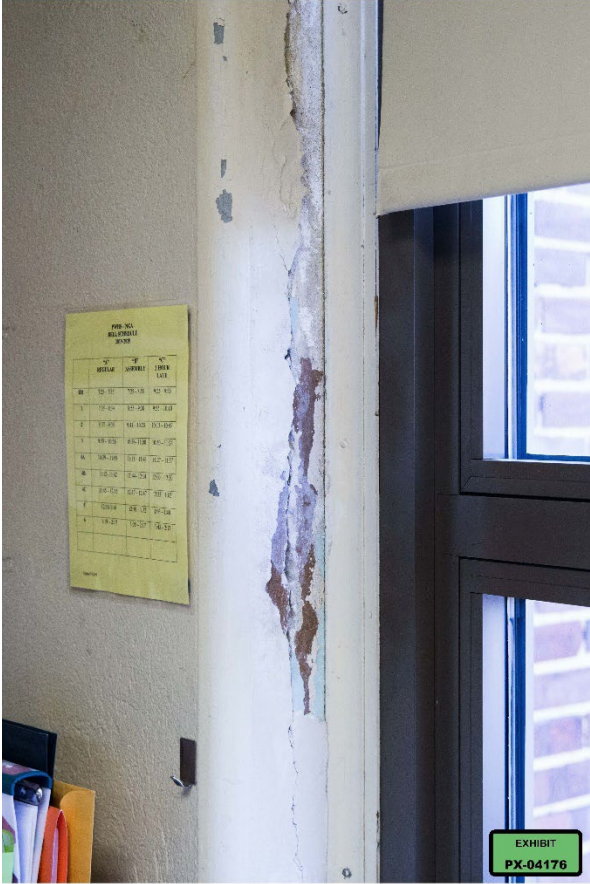
**PX-4169** depicts the 9th grade campus of Penn Wood High School in William Penn School District, which is also known as Cypress Street. Tr. 6993:13-22 (Harbert).



**PX-4175** depicts conditions at Penn Wood High School Cypress Street in the William Penn School District. Tr. 7379:7-8 (Harbert); Tr. 7379:11-16 (Harbert).



PX-4176 depicts conditions at Penn Wood High School Cypress Street in the William Penn School District. Tr. 7379:7-8 (Harbert); Tr. 7379:17-23 (Harbert).





**PX-4184** depicts a student at Penn Wood High School Cypress Street in the William Penn School District who is trying to learn, but he has his jacket on with the hood up and sleeves pulled down because the classroom in which he is learning is so cold. Tr. 6996:11-6997:4 (Harbert).

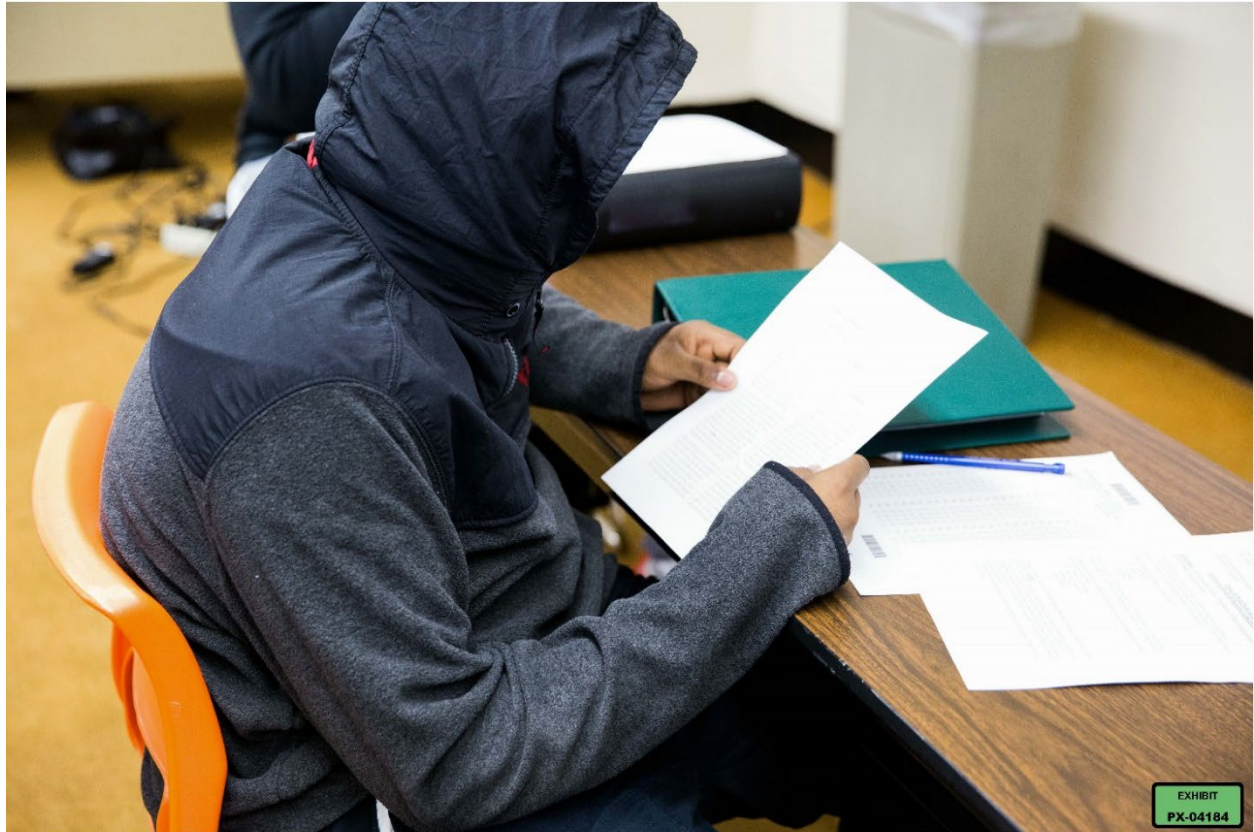


EXHIBIT  
PX-04184

WILLPEN-0012374  
PX-04184-0001

**PX-4185** depicts a photo of a special education teacher at Penn Wood High School Cypress Street in the William Penn School District, wearing a shawl because her classroom is cold and lacks heating. Tr. 6994:10-6995:7 (Harbert). Former superintendent Harbert returned to the school two weeks prior to her January 6, 2022 testimony and saw Ms. Fanelli wearing this same shawl in her classroom. Tr. 6995:12-14 (Harbert).



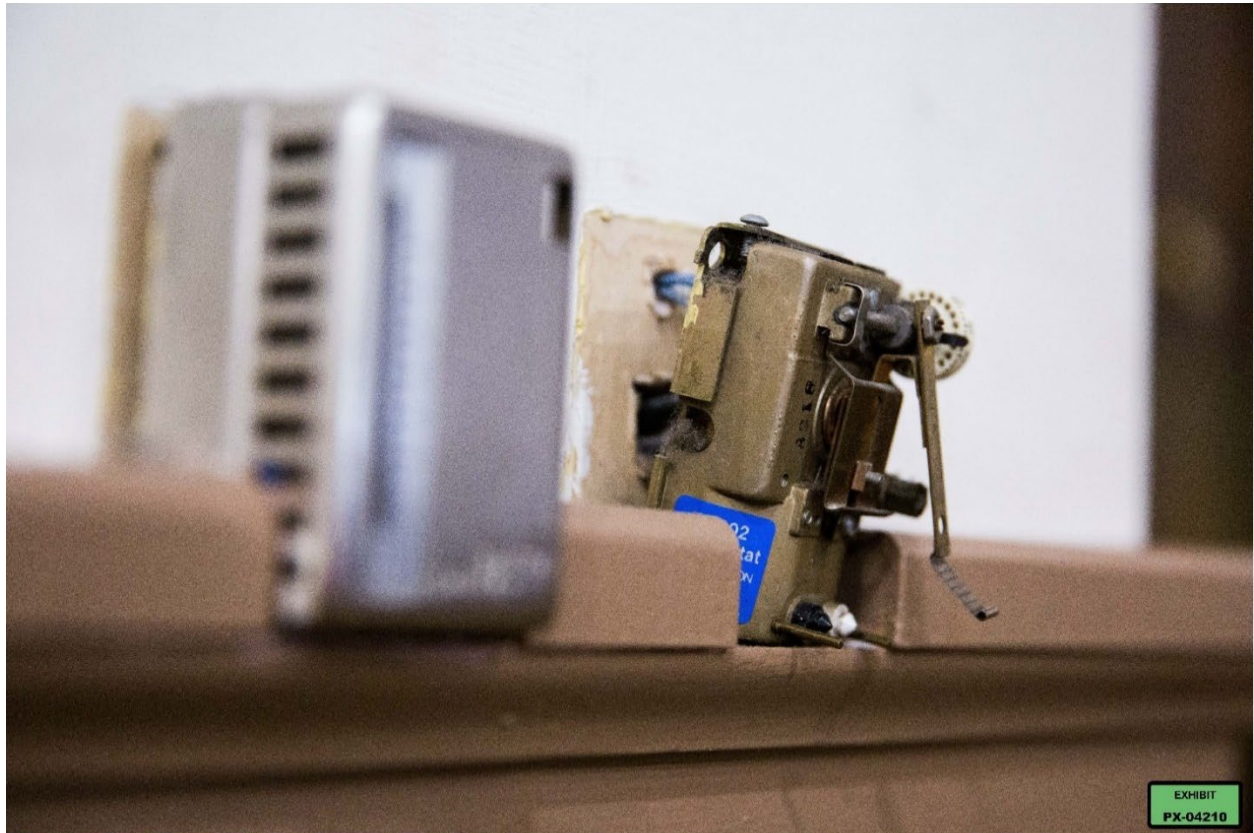
**PX-4187** depicts the ceiling of a special education classroom at Penn Wood High School Cypress Street in the William Penn School District which is stained by water damage and has paint peeling from moisture. Tr. 6995:17-6996:4 (Harbert). This accurately reflects the conditions of the room today. Tr. 6996:5-8 (Harbert).



PX-4207 depicts a non-functioning scoreboard from Penn Wood High School Cyprus Street in William Penn School District, which is in disrepair with several numbers and lights falling out of the board. Tr. 6607:18-6608:13 (Curry). This is an accurate depiction of the scoreboard today. Tr. 6608:11-3 (Curry).



**PX-4210** depicts the thermostat in the Penn Wood High School Cypress Street auditorium in William Penn School District, which is nonfunctional and therefore does not heat the auditorium. Tr. 6998:16-6999:6 (Harbert).



WILLPENN-0012400  
PX-04210-0001

**PX-4211** depicts the ceiling of the auditorium at Penn Wood High School Cypress Street in William Penn School District, which has paint peeling and cracked plaster caused by moisture damage. Tr. 6998:2-11 (Harbert). This accurately reflects the condition of the auditorium when former superintendent Harbert visited two weeks prior to her testimony. Tr. 6998:12-15 (Harbert).



EXHIBIT  
**PX-04211**

WLLPEN-0012401  
PX-04211-0001

**PX-4212** depicts the front of the stage, which has broken and missing vents, in the auditorium at Penn Wood High School Cypress Street in William Penn School District. Tr. 6997:12-20 (Harbert).



EXHIBIT  
**PX-04212**  
WILLPENN-0012402  
PX-04212-0001

**PX-4213** depicts the ceiling of the auditorium at Penn Wood High School Cypress Street in William Penn School District, which has paint peeling and cracked plaster caused by moisture damage. Tr. 6998:2-11 (Harbert). This accurately reflects the condition of the auditorium when former superintendent Harbert visited two weeks prior to her testimony. Tr. 6998:12-15 (Harbert).





**PX-4215** depicts the Green Avenue campus of Penn Wood High School in William Penn School District, which holds 10th through 12th grades. Tr. 6999:14-7000:1 (Harbert).



**PX-4217** depicts taped down wires running across the floor of a Green Avenue Penn Wood High School history classroom in William Penn School District. Tr. 7000:7-7001:6 (Harbert). Because of the building's age, it is not adequately wired for modern classrooms and therefore the teacher must tape down extension cords to supply power while not creating a safety hazard. Tr. 7000:14-7001:6 (Harbert). This accurately reflects the condition of the auditorium when former superintendent Harbert visited two weeks prior to her testimony. Tr. 7002:4-7 (Harbert).



**PX-4218** depicts a broken window in a history classroom at Green Avenue Penn Wood High School in William Penn School District, which will fall out of the frame if opened. Tr. 7001:9-24 (Harbert) This is particularly problematic given that the building struggles with heating, does not have cooling, and has ventilation problems. Tr. 7001:14-24 (Harbert). This accurately reflects the condition of the auditorium when former superintendent Harbert visited two weeks prior to her testimony. Tr. 7002:1-7 (Harbert).



**PX-4223** depicts conditions at Penn Wood High School, Green Avenue, within William Penn School District. Tr. 7380:3-14; 7392:10-20 (Harbert).



WILLPENN-0012413  
PX-04223-0001

**PX-4231** depicts conditions at Penn Wood High School, Green Avenue, within William Penn School District. Tr. 7380:6-7, 15-21 (Harbert); Tr. 7392:10-20 (Harbert).



WILLPENN-0012421  
PX-04231-0001

**PX-4257** depicts a paint and plaster peeling off a classroom wall because of moisture damage at Penn Wood, Green Avenue campus, in William Penn School District. Tr. 7005:2-22 (Harbert). This wall had been recently painted. Tr. 7006:10-22 (Harbert).



EXHIBIT  
**PX-04257**

WILLPENN-0012447  
PX-04257-0001

**PX-4258** depicts a paint and plaster peeling off a classroom wall because of moisture damage at Penn Wood, Green Avenue campus in William Penn School District. Tr. 7005:2-22 (Harbert). The heating system in this exhibit is coming loose, the top is bent, and the system is in disrepair. Tr. 7005:15-22 (Harbert). The wall has been recently painted, but the heating vent accurately reflects the condition of the auditorium when former superintendent Harbert visited two weeks prior to her testimony. Tr. 7002:10-22 (Harbert).



EXHIBIT  
PX-04258  
WILLPENN-0012448  
PX-04250-0001

**PX-4263** depicts conditions at Penn Wood High School, Green Avenue, within William Penn School District. Tr. 7380:6-7 (Harbert); Tr. 7381:5-11 (Harbert); Tr. 7392:10-20 (Harbert).



EXHIBIT  
PX-04263  
WILLPENN-0012453  
PX-04263-0001



**PX-4270** depicts conditions at Penn Wood High School, Green Avenue, within William Penn School District. Tr. 7380:6-7 (Harbert); Tr. 7381:12-18 (Harbert); Tr. 7392:10-20 (Harbert).



EXHIBIT  
**PX-04270**  
WILLPENN-0012460  
PX-04270-0001

PX-4291 depicts Walnut Street Elementary School within William Penn School District. Tr. 7381:19-7382:2 (Harbert).



**PX-4293** depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:19-7382:2 (Harbert); Tr. 7382:3-9 (Harbert).



**PX-4294** depicts the dirty, rusted ceiling vent and falling ceiling tiles in a classroom at Walnut Elementary in William Penn School District. Tr. 7013:18-7014:8 (Harbert) The conditions of these vents affect the already poor ventilation conditions in Walnut Elementary. Tr. 7014:3-8 (Harbert).



EXHIBIT  
**PX-04294**

WILLPENN-0012484  
PX-04294-0001

**PX-4296** depicts a rusted, corroded metal panel that is peeling away from the wall due to moisture problems in a first grade classroom in William Penn School District. Tr. 7011:19-7012:15 (Harbert).



EXHIBIT  
**PX-04296**  
WILLPENN-0012486  
PX-04296-0001

**PX-4297** depicts internet and telephone cables and wires running along the student stairwell wall in Walnut Elementary in William Penn School District. Tr. 7012:19-7013:15 (Harbert).



**PX-4298** depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7382:13-19 (Harbert).



**PX-4349** depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7383:1-6 (Harbert).





PX-4356 depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7383:7-13 (Harbert).



WILLPENN-0012646  
PX-04356-0001

PX-4357 depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7383:14-19 (Harbert).



**PX-4359** depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7383:20-7384:1 (Harbert).



**PX-4360** depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7384:2-7 (Harbert).



EXHIBIT  
PX-04360  
WILLPENN-0012550  
PX-04360-0001

**PX-4368** depicts conditions at Walnut Street Elementary School within William Penn School District. Tr. 7381:24-7382:2 (Harbert); Tr. 7384:8-13 (Harbert).



EXHIBIT  
**PX-04368**

WILLPENN-0012558  
PX-04368-0001

PX-4372 depicts Evans Elementary School within William Penn School District.

Tr. 7384:14-19 (Harbert).



**PX-4374** depicts conditions at Evans Elementary School within William Penn School District. Tr. 7384:14-19; Tr. 7384:20-7385:1 (Harbert). Since the time of this photo, the school has “repaired” the pipe by wrapping it in duct tape. Tr. 7385:2-6 (Harbert).



EXHIBIT  
PX-04374  
WILL PENN-00-0561  
PX-04374-001

**PX-4391** depicts conditions at Evans Elementary School within William Penn School District. Tr. 7384:14-19; Tr. 7385:7-13 (Harbert).





**PX-4411** depicts the home field for upperclassmen in the William Penn School District, which has rented light towers stationed on their running track so that students can play varsity football games. Tr. 6593:24-6594:16 (Curry). The field lacks bathrooms and changing rooms so teams must change several blocks away. Tr. 6593:19-23 (Curry); 6594:17-6595:2 (Curry).



EXHIBIT  
PX-04411  
WILLPEN-0012801  
PX-04411-0001

PX-4412 depicts East Lansdown Elementary School within William Penn School District. Tr. 7385:14-20 (Harbert).



**PX-4413** depicts conditions at East Lansdowne Elementary School within William Penn School District. Tr. 7385:14-20; Tr. 7385:21-7386:3 (Harbert).



**PX-4415** depicts the basement art room at East Lansdowne Elementary School in William Penn School District, which has a large, red drainage pipe running through the classroom towards the sump pump. Tr. 7015:8-10 (Harbert); 7015:14-7016:13 (Harbert). This accurately reflects the condition of the art room when former superintendent Harbert visited two weeks prior to her testimony. Tr. 7017:4-9 (Harbert).

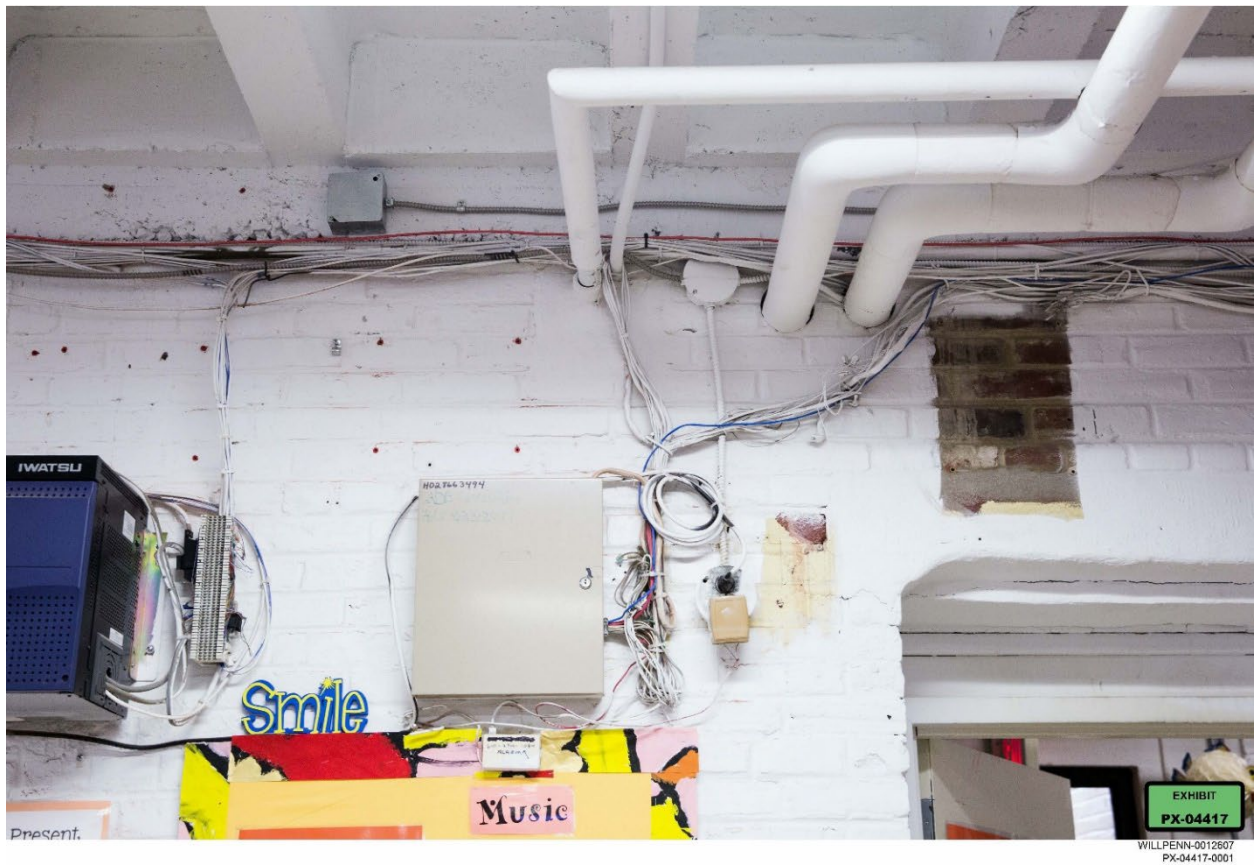


EXHIBIT  
PX-04415  
WILLPENN-0012805  
PX-04415-0001

**PX-4416** depicts the basement art room at East Lansdowne Elementary School in William Penn School District, which has a large, red drainage pipe running through the classroom towards the sump pump. Tr. 7015:8-10; 7015:14-7016:13 (Harbert). This accurately reflects the condition of the art room when former superintendent Harbert visited two weeks prior to her testimony. Tr. 7017:4-9 (Harbert).



**PX-4417** depicts the basement art room at East Lansdowne Elementary School in William Penn School District, which has considerable uncovered wiring across the wall. Tr. 7015:8-10 (Harbert); 7016:17-7027:3 (Harbert). This accurately reflects the condition of the art room when former superintendent Harbert visited two weeks prior to her testimony. Tr. 7017:4-9 (Harbert).



PX-4427 depicts the mats in the gymnasium that students at William Penn School District would use for stretching before athletic events. The bottoms of the mats are covered in mold caused by leaks in the roof of the building, allowing water to seep into storage areas. Tr. 6613:7-6615:8. The school has since removed the moldy mats. Tr. 6615:11-12 (Curry).



EXHIBIT  
PX-04427  
WILLPENN-0012617  
PX-04427-0001

**PX-4431** depicts a non-functioning shower area in a former boy's locker room in William Penn School District that the school converted into a makeshift weight room. Tr. 6617:3-6619:6 (Curry). The shower was spray painted and furnished with older, donated weights so that teams could utilize this space for training. Tr. 6617:3-6619:6 (Curry). The school has since abandoned this makeshift weight room because the area did not have adequate ventilation or circulation, the weights and floors became extremely rusty, and it was impractical to permit students to use this space during COVID. Tr. 6617:8-6619:21 (Curry).



EXHIBIT  
**PX-04431**  
WILLPENN-0012821  
PX-04431-0001



**PX-4437** depicts the bleachers at Lansdowne High School in William Penn School District, which have been condemned and have structural bars exposed. Tr. 6588:16-6589:11 (Curry). The school has put up yellow tape to prevent people from sitting on these bleachers. Tr. 6589:1-11 (Curry). This is an accurate depiction of the way the stands look today. Tr. 6589:12-15 (Curry).



EXHIBIT  
PX-04437  
WILLPENN-0012627  
PX-04437-0001

**PX-4440** depicts the football field, running track, and out-of-use long jump pit at William Penn School District's upperclassman high school. Tr. 6591:4-6592:15 (Curry). In the background is a blue pole, which was the former scoreboard until it became too old and was unsafe to remain in its position; the district has been unable to replace the board. Tr. 6591:23-6592:1 (Curry). The yellow pole is the former goal post, which was damaged after being struck by a tree in a storm; the district has been unable to replace the goal post. Tr. 6592:2-4 (Curry). The jump pit is no longer in use because it is not long enough or deep enough for athletes to safely use; the district is unable to replace the pit due to drainage issues on the field. Tr. 6592:7-15 (Curry). This reflects the current state of the field and track. Tr. 6592:16-20 (Curry).



**PX-770** depicts water intrusion affecting Roosevelt School in the School District of Philadelphia. Tr. 7800:19-7801:12 (Hite). The visible results of the water damage include peeling lead paint, which has led to lead paint chips on the floor, and rusting along the floor. Tr. 7800:19-7801:12 (Hite); 7801:24-7802:9 (Hite). Roosevelt has been able to remediate the lead paint issue, but approximately 75-80% of the over one hundred schools in the School District of Philadelphia still need lead paint remediation. Tr. 7802:15-24 (Hite).



EXHIBIT  
**PX-00770**

PET-012457  
PX-00770-0001

**PX-772** depicts water intrusion affecting Roosevelt School in the School District of Philadelphia. Tr. 7804:4-13 (Hite). The visible results of the water damage include buckling and peeling lead paint, which increase the possibility of lead poisoning. Tr. 7804:10-13; 7805:5-17 (Hite). Water damage such as this also impact covering over asbestos materials, which creates additional health hazards. Tr. 7805:2-7806:5 (Hite).

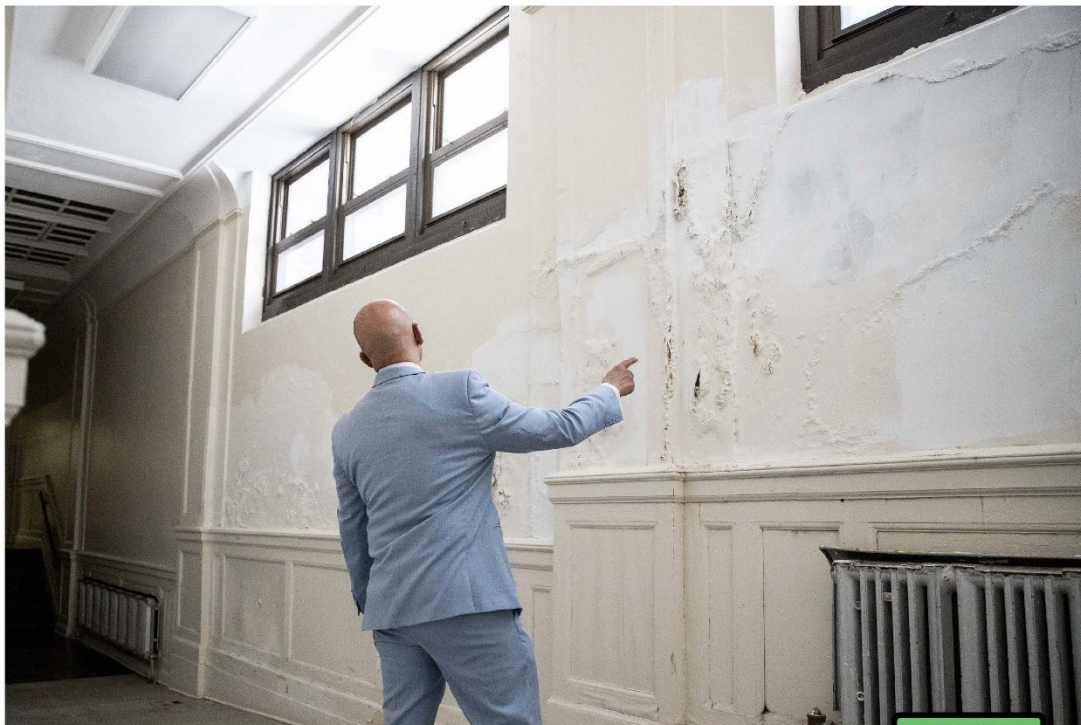


EXHIBIT  
**PX-00772**

PET-012459  
PX-00772-0001

**PX-774** depicts a lab space within Randolph Technical School, in the School District of Philadelphia, which has caused paint to peel and plaster to buckle around the window seal. Tr. 7812:1-23 (Hite). This condition has since been repaired at Randolph. Tr. 7813:4-6 (Hite).



EXHIBIT  
**PX-00774**

PET-022491  
PX-00774-0001

**PX-776** depicts standing water on the floor of a lab space at Randolph Technical School in the School District of Philadelphia, where students commonly use electrical tools to practice carpentry or piping work. Tr. 7809:19-7810:16 (Hite). The flooding was caused by a leak in the roof that was over the lab space. Tr. 7810:11-16 (Hite). This flooding has rendered the space unusable due to the hazards of using electrical tools by leaks and standing water. Tr. 7810:21-7811:9 (Hite). The roof leak has been repaired at Randolph, but other schools in the district currently experience ongoing leaks. Tr. 7811:10-17 (Hite).



EXHIBIT  
**PX-00776**

PET-022493  
PX-00776-0001

**PX-777** depicts standing water on the floor of a lab space at Randolph Technical School, commonly used for student education in electrical work, plumbing, welding, and vendor machine repair. Tr. 7808:8-7809:18 (Hite). The flooding was caused by a leak in the roof that was over the lab space. Tr. 7808:14-7809:18 (Hite). The roof leak has been repaired at Randolph, but other schools in the School District of Philadelphia currently experience ongoing leaks. Tr. 7811:10-17 (Hite).

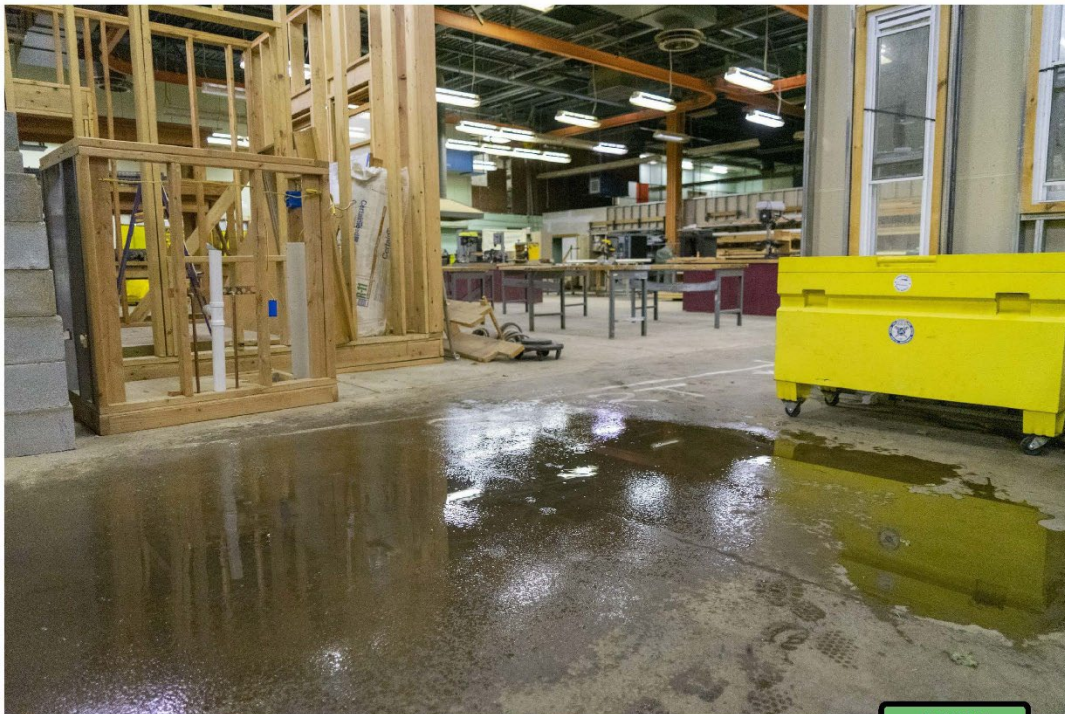


EXHIBIT  
**PX-00777**

PET-022494  
PX-00777-0001