

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT
CIVIL ACTION
NO. 00-2564F

ROBERT L. MANDELL, et al.)
Plaintiffs,)
v.)
TOWN OF READING,)
Defendant.)

AFFIDAVIT OF HARRY K. HARUTUNIAN

I, Harry K. Harutunian, being duly sworn, do hereby depose and state:

1. I have been the Superintendent of Schools in the Town of Reading, Massachusetts ("Reading") since 1995, and I have personal knowledge of the following facts.

2. In my role as Reading's Superintendent of Schools I am responsible for a budget of more than \$25 million.

3. In addition, since the Reading Public Schools do not employ a business manager, I am responsible for all areas of the budget.

4. The two weeks before the start of classes and the two weeks thereafter, are the busiest time of the year for school administration.

5. In addition to my normal tasks associated with running the business of Reading's schools, over the next four weeks, I will be required to perform a variety of other tasks important to the operation of Reading's schools. These tasks must be

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addressed prior to and immediately after the commencement of classes on August 31, 2000. These tasks include but are not limited to:

- Visiting each of Reading's seven schools on August 28th – 29th during Teacher in-service programs;
- Visiting each of Reading's seven schools for one full school day during the first two weeks of classes;
- Re-assignment of staff to address the vacancy made by the elimination of the Director of Technology position;
- Hiring of five teachers, 13 educational assistants and two cafeteria workers;
- Negotiation with the Reading Teachers Association regarding plans for re-certification;
- Beginning contract negotiations with the Reading Teachers Association by September 15th.
- Meeting for several hours on a weekly basis with Director of Special Education;
- Meeting for several hours on a weekly basis with new principal at middle school;
- Working with architect on \$50 million renovation of Reading Memorial High School;
- Preparation of 10 year capital plan for approval by School Committee;
- Preparation and submission of two budgets one with override and one without;
- Meeting with school principal and instruction specialist to implement technology for redesigned language arts program;
- Reviewing crisis implementation plan with principals;
- Development modifications to Youth Risk Behavior Survey at the direction of Reading's Board of Selectmen and School Committee;
- Addressing parent appeals to student placement;
- Negotiation of contract with Boston Gas for conversion from oil to gas at three elementary schools and high school;
- Development of redistricting plan for elementary schools; and
- Completion of contract negotiations with administrators.

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6. These items represent only a sampling of my total responsibilities during the next four weeks and do not include my normal day-to-day responsibilities which including addressing any emergent issues or responding to parent or teacher complaints and attending school committee meetings with consequent follow-up responsibilities.

Sworn under the penalties of perjury this 24th of August 2000.


Harry K. Larrutunian

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