

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
No. 3:20-cv-00596

Johnny H. Coble, Jr. and Robin Coble, both
on behalf of their minor child "J.H.C",

Plaintiff,

**DECLARATION OF
JENNIFER HUNT**

v.

Lake Norman Charter School, Inc., *et al.*,

Defendants.

Pursuant to 28 U.S.C. § 1746, Jennifer Hunt declares as follows:

1. I am over eighteen years of age and competent to testify to the matters set out herein.
2. I am employed by Lake Norman Charter School as a teacher in the English Language Arts program. Part of my duties include teaching the ninth-grade ELA course.
3. *The Poet X* by Elizabeth Acevedo was published in 2018. It won the National Book Award for Young Adult Literature in 2018, the United Kingdom's equivalent of that award in 2019 (the Carnegie Medal), and several other prestigious awards.
4. The ninth-grade ELA curriculum consists of six interconnected units that explore various forms of written and oral communication, including: short stories, novels, poetry, and dramatic plays.
5. The ELA team of educators at Lake Norman Charter, with the approval of our school administrators, chose *The Poet X* because it is an excellent vehicle by which to teach the following topics:
 - Poesy (the art and mechanics of writing poetry)
 - A representation of slam poetry (which is often very different from other forms of poetry)

- Characterization (dynamic, static, development)
- Themes of identity, family relationship, independence, finding one's voice, and stereotypes
- Literary devices and analysis
- Structure
- Verse v. Prose
- Writing
- Slam poetry and public speaking
- Poetry comparison (using the works of Maya Angelou and Jacqueline Woodson)

6. These topics are solid, pedagogically correct things to work on as part of the ninth-grade curriculum.

For example, one of the writing exercises that we use from *The Poet X* is the one that appears at pages 126-127 of the book — an exercise where the student writes the last paragraphs of his/her biography, using the author's writing style as a mentor text. In her draft, Xiomara writes in verse, but in her final version, she submits prose. This exercise has nothing to do with religion.

Another example is a writing exercise that asks the student describe someone s/he thinks has been misunderstood by society. This is based on pages 179-180 of *The Poet X*, but we require the assignment to be done in verse. This reinforces the poetry writing skills in the unit.

One more example is an assignment that has the student write about the last time s/he felt free using one of the formats from the book on pages 244-248. Again, this has nothing to do with teaching religion or requiring any student agree with or disagree with anything the author has said about religion.

7. We used *The Poet X* during the 2018-19 school year, and our students indicated by their engagement during the unit that the book resonated with them because it is beautifully written and crafted. Accordingly, we decided to use it again in the current school year.


8. When school began in August 2020, we sent our English syllabus to all families. It indicated that we would again be using *The Poet X* as part of the ELA course. We required all families to acknowledge receipt of the course syllabus. The Cobles did so on August 25, 2020.

9. In our use of *The Poet X*, we do not ask students to endorse or disapprove of the Xiomara's religious views or any other person's views of religion. We do ask the students to read the book and to discuss its themes in terms of the topics listed above. *The Poet X* is directly relevant to the themes relevant to our unit on poetry.

10. For students who would rather not read the main selection of an ELA unit (or whose families object), we allow them to opt out and to read another book. We have several students who have chosen not to read *The Poet X* this fall. Our plan for how to deliver the alternate selection has evolved somewhat from earlier this school year. The Cobles' son will read a different selection with a different ELA-certified teacher in a different classroom. He will have the same opportunities for meaningful engagement with the alternative text and with his classmates during that time.

11. I certify under penalty of perjury that the foregoing is true and correct.

Executed this the 4th day of November, 2020.


Jennifer Hunt

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Declaration of Jennifer Hunt through Court's CM-ECF on-line filing system, which will transmit copies to counsel for Plaintiff.

This the 4th day of October, 2020.

/s/ James G. Middlebrooks
James G. Middlebrooks