

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:25-cv-13047-FDS

ALAN L., on behalf of himself and his minor  
Child, J.L.  
Plaintiff

v.  
LEXINGTON PUBLIC SCHOOLS; LEXINGTON  
SCHOOL COMMITTEE; DR. JULIE HACKET, in  
individual and official capacity as Superintendent of  
the Lexington Public School District; DR. GERARDO  
J. MARTINEZ, in his individual and official capacity  
as Principal of Joseph Estabrook Elementary School and;  
ANDREA SO, in her individual and official  
Capacity as Director of Elementary Education,  
Defendants

**AFFIDAVIT OF CAROLINE CHESTNA**

I, Caroline Chestna, hereby depose and state the following:

1. I am over 18 years of age, of sound mind, and have personal knowledge of all statements in this affidavit.
2. I am a Kindergarten teacher at the Joseph Estabrook Elementary School in Lexington, Massachusetts, one of the schools that makes up Lexington Public Schools.
3. As a Kindergarten teacher, I am also referred to as a “general education teacher” in the context of discussions regarding special education.
4. The student referred to as “J.L.” in the Plaintiff’s Complaint is one of the students in my Kindergarten classroom, which is a general-education classroom referred to as “GenEd 103.”

5. J.L. has been identified as having special needs, and thus is on an Individualized Education Program (“IEP”) that accounts for his unique educational needs and enables him to access the curriculum.
6. J.L.’s IEP that has been in place since the beginning of the school year calls for more time outside of the general-education classroom than in it.
7. Health and Social Studies blocks account for 30 minutes of general-education classroom time.
8. J.L. attends some portion of Health and Social Studies class time, but because of the behavioral and specific educational needs he has, he typically is only present for the first 15 minutes of these classes, after which time he leaves the general-education classroom with the Student Support Instructor (“SSI”) assigned to him, to work on other assignments.
9. J.L. typically does not attend Math blocks within my classroom; he usually spends this time in another classroom referred to as the “ILP classroom” or “Room 106,” working on other assignments or receiving behavioral awards with his SSI.
10. On occasion, I present books to my class by reading them aloud to the students. These books are referred to as “read-alouds.”
11. On August 29, 2025, I began presenting the book, “All Are Welcome” to my class at or shortly after 9:30 A.M., the time at which J.L. is typically out of the classroom and doing work in the ILP classroom.

12. Additionally, I have no recollection as to whether J.L. was present for the portion of the Health class on September 16, 2025 during which time a read-aloud titled, "Families, Families, Families" was presented to the class.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 12<sup>th</sup> DAY OF NOVEMBER, 2025.

  
Caroline Chestna