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*Attorneys for Plaintiffs Fernando Gomez Ruiz, Fernando Viera Reyes, Jose Ruiz Canizales, Yuri Alexander Roque Campos, Sokhean Keo, Gustavo Guevara Alarcon, Alejandro Mendiola Escutia and all others similarly situated*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

FERNANDO GOMEZ RUIZ; FERNANDO  
 VIERA REYES; JOSE RUIZ CANIZALES;  
 YURI ALEXANDER ROQUE CAMPOS;  
 SOKHEAN KEO; GUSTAVO GUEVARA  
 ALARCON; and ALEJANDRO MENDIOLA  
 ESCUTIA, on behalf of themselves and all  
 others similarly situated,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS

Case No. 3:25-cv-09757-MMC

**DECLARATION OF STEVEN P.  
 RAGLAND IN SUPPORT OF  
 PLAINTIFFS' MOTION FOR CLASS  
 CERTIFICATION**

Date: January 9, 2026  
 Time: 9:00 a.m.  
 Dept.: Ctrm 7 – 19th Floor  
 Judge: Hon. Maxine M. Chesney

Date Filed: November 12, 2025

DECLARATION OF STEVEN P. RAGLAND IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS  
 CERTIFICATION

Case No. 3:25-cv-09757-MMC

1 ENFORCEMENT; TODD M. LYONS,  
2 Acting Director, U.S. Immigration and  
3 Customs Enforcement; SERGIO  
4 ALBARRAN, Acting Director of San  
5 Francisco Field Office, Enforcement and  
6 Removal Operations, U.S. Immigration and  
7 Customs Enforcement; U.S. DEPARTMENT  
8 OF HOMELAND SECURITY; KRISTI  
9 NOEM, Secretary, U.S. Department of  
10 Homeland Security,

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Defendants.

DECLARATION OF STEVEN P. RAGLAND IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION

Case No. 3:25-cv-09757-MMC

1 I, Steven P. Ragland, declare as follows:

2 1. I am a partner of the law firm of Kecker, Van Nest & Peters LLP. I and my firm  
3 represent named Plaintiffs Fernando Gomez Ruiz, Fernando Viera Reyes, Jose Ruiz Canizales,  
4 Yuri Alexander Roque Campos, Sokhean Keo, Gustavo Guevara Alarcon, and Alejandro  
5 Mendiola Escutia in this lawsuit. I am a member of the California State Bar, and I am admitted in  
6 the United States District Court for the Northern District of California. I have personal knowledge  
7 of the facts stated in this Declaration and, if called to testify, could and would competently testify  
8 thereto. I make this declaration in support of Plaintiffs' Motion for Class Certification.

9 2. My law firm has the necessary experience and resources to adequately represent  
10 and protect the interests of the class in this matter. Kecker, Van Nest & Peters has extensive  
11 experience litigating high-stakes complex litigation. It has been named the top litigation boutique  
12 by the *Daily Journal* and litigation boutique of the year by the *American Lawyer*. It was also  
13 named as one of the 2024 *Law360* top trial groups of the year.

14 3. Kecker, Van Nest & Peters also has significant experience handling civil rights  
15 cases seeking to vindicate the rights of underserved populations. Following are examples of some  
16 of this relevant work and experience:

17 a. United Farm Workers v. Noem, No. 1:25-CV-00246 JLT CDB (E.D. Cal.): In  
18 an ongoing case brought in partnership with the ACLU challenging the  
19 government's mass deportations, we successfully obtained a preliminary  
20 injunction barring U.S. Border Patrol from using stop-and-arrest practices that  
21 violate federal law and the U.S. Constitution. The preliminary injunction  
22 prohibits Border Patrol agents from stopping people without reasonable  
23 suspicion that they are noncitizens and in the U.S. in violation of federal  
24 immigration law and arresting people without a warrant if agents lack probable  
25 cause to believe the person is a flight risk.

26 b. Jewett, et al., v. Shasta Cty. Sheriff's Dep't et al., 2:13-cv-00882-MCE-AC  
27 (E.D. Cal.): In conjunction with the Disability Rights Legal Center, we  
28 successfully represented a certified class of inmates at the Shasta County Jail

1 in claims related to civil rights and disability law violations, ultimately  
 2 obtaining injunctive relief requiring comprehensive policy and structural  
 3 changes at the Shasta County Jail and a multi-year monitoring period.

- 4 c. Wilbur P.G., et al. v. U.S., 4:21-cv-04457-KAW (N.D. Cal.): In partnership  
 5 with the Lawyers' Committee for Civil Rights and the ACLU, we successfully  
 6 represented immigrant families who had been subjected to the government's  
 7 family-separation policy—where the government had forcibly separated  
 8 parents from their children in Customs and Border Protection facilities in  
 9 Arizona. We settled the case weeks before trial.
- 10 d. Al-Mowafak, et al. v. Trump, et al., 3:17-cv-00557-WHO (N.D. Cal.): With the  
 11 ACLU Foundation of Northern California, we represented individuals who  
 12 were injured by the government's unlawful entry ban. The case was stayed  
 13 when another district court entered a nationwide injunction.
- 14 e. Preap v. Johnson, 303 F.R.D. 566 (N.D. Cal. 2014), *aff'd*, 831 F.3d 1193 (9th  
 15 Cir. 2016): We represented a class of undocumented immigrants who brought  
 16 a case against the Secretary of Department of Homeland Security challenging  
 17 their mandatory detention without bond under the Immigration and Nationality  
 18 Act.

19 4. Attorneys at my firm have experience trying and litigating class actions, including  
 20 RICO, antitrust, consumer, employment, false advertising, copyright, unfair business practices,  
 21 and securities cases, and cases involving detained individual's rights and constitutional and  
 22 Rehabilitation Act claims. The firm has served as both plaintiff and defense counsel in numerous  
 23 class actions, including *Jewett, et al. v. Shasta Cty., et al.*, in which I led the successful  
 24 representation of a class of detained individuals at the Shasta County Jail.

25 5. In partnership with co-counsel, my firm has conducted extensive identification and  
 26 investigation of potential class claims in this case. My firm has the capacity to thoroughly and  
 27 vigorously prosecute the claims in this case and properly represent the class. We have undertaken  
 28

1 this case on a pro bono basis and have committed, and will continue to commit, the resources  
2 necessary to litigate it.

3 6. Moreover, Keker, Van Nest & Peters has no conflict with the proposed class  
4 members that would compromise its ability to represent the class.

5 7. I have been a member of the State Bar of California since 2002 and am currently  
6 in my twenty-third year of practicing complex civil litigation and criminal defense. I have  
7 represented a wide range of clients, ranging from Fortune 100 companies to detained individuals,  
8 and am experienced in all phases of litigation from pre-litigation advice through trial and appeal.  
9 Throughout my twenty-one years at Keker, Van Nest & Peters, I have maintained an active pro  
10 bono practice and represented prisoners with claims of innocence, exonerated individuals  
11 pursuing civil rights actions for wrongful incarceration, defendants challenging unlawful charging  
12 decisions, and a class of prisoners challenging unlawful conditions of confinement. I have argued  
13 extensively in dozens of hearings in multiple state and federal district courts, and in the Ninth  
14 Circuit Court of Appeal.

15 8. I have been listed in Best Lawyers in America since 2018, named among the  
16 Leading Litigators in America by Lawdragon for multiple years, recognized as a Northern  
17 California Super Lawyer every year since 2013 in multiple practice areas, named a Benchmark  
18 Litigation Star, and received a California Lawyer of the Year Award in 2017. I have lectured  
19 extensively on federal court practice and have been an invited speaker at several national legal  
20 conferences. I have devoted substantial time to disability rights issues, including serving on the  
21 Board of Directors of Families of Spinal Muscular Atrophy/Cure SMA and the Board of  
22 Directors of Disability Rights Advocates. I have also devoted substantial legal time and resources  
23 to cases involving disability rights and in 2024 accepted the Pro Bono Award from the Disability  
24 Rights Legal Center for my and my firm's work vindicating the rights of people living with  
25 disabilities.

26 9. My partner, Cody S. Harris, is working with me on this matter. Cody is  
27 experienced in all phases of litigation and has litigated numerous high-stakes civil matters. He  
28 also has litigated multiple class action lawsuits, including several securities fraud class actions,

1 consumer class actions, and a civil antitrust class action that would have been the largest class  
2 ever certified by a federal court. Since joining the firm in 2008, he has maintained a robust pro  
3 bono practice. For example, he successfully obtained a nationwide injunction against a January  
4 2017 executive order that attempted to deprive state and local governments of federal funds  
5 unless they helped enforce federal immigration directives. He has also represented individuals  
6 held in both state and federal custody, including individuals detained in Guantanamo Bay as part  
7 of the U.S. Government's Global War on Terror. He has argued in several state and federal  
8 district courts and in the Ninth Circuit.

9 10. Cody is a member of the bar of the State of California and admitted in the United  
10 States District Court for the Northern District of California. He served as a judicial law clerk for  
11 Judge David S. Tatel of the U.S. Court of Appeals for the D.C. Circuit from 2007 to 2008 and  
12 graduated from Stanford Law School in 2007. He taught constitutional law through Stanford's  
13 Continuing Studies Program for more than a decade and frequently lectures on constitutional law  
14 and the Supreme Court. The Daily Journal named Cody a Top 40 Lawyer Under 40 and  
15 California Lawyer of the Year in 2018. He has been recognized as a Super Lawyer Rising Star  
16 and a Super Lawyer in multiple practice areas.

17  
18 I declare under penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct, and that I signed this declaration at San Francisco, California on  
20 November 26, 2025.

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22 /s/ Steven P. Ragland  
23 Steven P. Ragland  
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