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

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 FERNANDO GOMEZ RUIZ; FERNANDO
 27 VIERA REYES; JOSE RUIZ CANIZALES;
 28 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 MARGOT
 MENDELSON 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

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.

1 I, Margot Mendelson, hereby declare:

2 1. I am the Executive Director of the Prison Law Office (“PLO”), a nonprofit based in
3 Berkeley, California, whose mission is to protect the rights of people in locked facilities, including
4 people in prisons, jails, juvenile facilities, and immigration detention centers. I make this
5 declaration to describe my qualifications and those of my colleagues to serve as counsel for the
6 Proposed Class in this case. The following facts are based on my own personal knowledge, and if
7 called as a witness, I could and would testify competently thereto.

8 2. I am a member of the California bar where I was admitted to practice in 2010. I have
9 been admitted to practice in the U.S. District Courts for the Northern, Central, and Eastern Districts
10 of California and the U.S. Courts of Appeals for Fourth and Ninth Circuits.

11 3. I received my B.A. from Harvard College and my J.D. from Yale Law School in
12 2009. I clerked for Judge Diana G. Motz of the U.S. Court of Appeals for the Fourth Circuit and
13 Judge Catherine Blake of the U.S. District Court for the District of Maryland. Before joining the
14 PLO, I worked at Rosen Bien Galvan & Grunfeld LLP, where I practiced complex civil litigation
15 in state and federal courts at the trial and appellate levels, with a focus on civil rights matters.

16 4. I have worked at PLO since 2016, when I joined the organization as a staff attorney.
17 In 2022, I became the Legal Director of PLO, and in 2023, I became the Executive Director.

18 5. As the Executive Director of PLO, I oversee and am directly involved in the
19 organization’s legal work. PLO has a long history of serving as class counsel on behalf of people
20 related to their conditions in locked facilities. Our office has litigated numerous large-scale class
21 actions over the last 30 years, including *Brown v. Plata*, 563 U.S. 493 (2011) (holding the court-
22 mandated population limit for California prisons was necessary to remedy violations of incarcerated
23 people’s constitutional rights to adequate medical and mental health care) and *Pennsylvania*
24 *Department of Corrections v. Yeskey*, 524 U.S. 206 (1998) (unanimously holding the Americans
25 with Disabilities Act applies to people incarcerated in state prisons). PLO is currently litigating
26 other major class action cases involving the rights of incarcerated people, including *Clark v.*
27 *California*, 123 F.3d 1267 (9th Cir. 1997) (statewide class action on behalf of incarcerated people
28 with developmental disabilities in California under the Americans with Disabilities Act);

1 *Armstrong v. Newsom*, 124 F.3d 1019 (9th Cir. 1997) (statewide class action on behalf of
 2 incarcerated people with physical and learning disabilities under the Americans with Disabilities
 3 Act and the Rehabilitation Act); *Coleman v. Newsom*, 912 F. Supp. 1282 (E.D. Cal. 1995)
 4 (statewide class action on the adequacy of mental health care in California prisons); *Plata v.*
 5 *Newsom*, C-01-1351 TEH (N.D. Cal. 2001) (statewide class action challenging inadequacy of
 6 health care in California state prisons); and *Jensen v. Arizona*, 754 F.3d 657 (9th Cir. 2014)
 7 (statewide class action to reform medical, mental health, and conditions of solitary confinement in
 8 Arizona prisons).

9 6. Other class action and impact litigation cases brought by PLO involving the rights
 10 of incarcerated people include *Gates v. Deukmejian*, 987 F.2d 1392 (9th Cir. 1993) (prison-wide
 11 class action to reform the conditions, psychiatric and medical care, and HIV discrimination at
 12 California Medical Facility); *Madrid v. Gomez*, 889 F. Supp. 1146 (N.D. Cal. 1995) (prison-wide
 13 class action to reform the conditions, medical and mental health care, guard brutality, due process,
 14 personal safety, access to law libraries at Pelican Bay State Prison); *Valdivia v. Davis*, 206 F. Supp.
 15 2d 1068 (E.D. Cal. 2002) (statewide class action challenging the lack of due process in California
 16 Board of Prison Terms parole revocation proceedings); *Perez v. Tilton*, 3:05-cv-05241-JSW (N.D.
 17 Cal. 2005) (statewide class action challenging inadequacy of California prisoner dental care); and
 18 *Farrell v. Tilton*, Case No. 3079344 (Alameda County Sup. Ct. 2003) (taxpayer action to reform
 19 the conditions of confinement for wards under the jurisdiction of the Division of Juvenile Justice
 20 [formerly California Youth Authority]).

21 7. PLO also has active consent decrees regarding jail conditions in numerous
 22 California counties, including Sacramento County (*Mays v. County of Sacramento*, No. 2:18-cv-
 23 02081-TLN-CSK (E.D. Cal. 2018)), Santa Clara County (*Chavez et al. v. County of Santa Clara*,
 24 No. 1:15-cv-05277-RMI (N.D. Cal. 2015)), Contra Costa County (*Young et al v. County of Contra*
 25 *Costa*, No. 5:20-cv-06848 (N.D. Cal. 2020)), Fresno County (*Hall et al. v. County of Fresno*, No.
 26 1:11-cv-02047-LJO-BAM (E.D. Cal. 2011)); and Riverside County (*Gray et al. v. County of*
 27 *Riverside*, No. 5:13-cv-00444 (E.D. Cal. 2013)). PLO previously had a consent decree in San
 28

1 Bernardino County (*Turner v. Cty. of San Bernardino*, No. 5:16-cv-00355-VAP-DTB (C.D. Cal.
2 2016).

3 8. I have served as lead or co-counsel in certified class actions challenging conditions
4 of confinement on behalf of people in prison or jail, including *Mays v. County of Sacramento*, No.
5 2:18-cv-02081-TLN-CSK (E.D. Cal. 2018); *Turner v. Cty. of San Bernardino*, No. 5:16-cv-00355-
6 VAP-DTB (C.D. Cal. 2016); *Chavez et al. v. County of Santa Clara*, No. 1:15-cv-05277-RMI (N.D.
7 Cal. 2015); *Gray et al. v. County of Riverside*, No. 5:13-cv-00444 (E.D. Cal. 2013); *Armstrong v.*
8 *Newsom*, 124 F.3d 1019 (9th Cir. 1997); and *Coleman v. Newsom*, 912 F. Supp. 1282 (E.D. Cal.
9 1995). I have also served as lead or co-counsel in a case involving conditions of confinement in
10 immigration detention, *Teneng v. Trump*, 5:18-cv-01609 (E.D. Cal. 2018).

11 9. My colleague, Tess Borden, began working at PLO in 2022 and is now a Supervising
12 Staff Attorney. Ms. Borden received her B.A. from Yale College and her J.D. cum laude from
13 Harvard Law School in 2014. She clerked for the Honorable George A. O'Toole, Jr. of the U.S.
14 District Court for the District of Massachusetts. She is admitted to the New York Bar and is
15 registered by the State Bar of California as a Registered Legal Aid Attorney through the
16 Multijurisdictional Practice (MJP) Program. Before joining PLO, Ms. Borden was a staff attorney
17 at the ACLU of New Jersey, where she litigated conditions of confinement and criminal legal
18 system reform in federal and state courts and testified before the legislature on solitary confinement,
19 prison oversight, and officer-perpetrated abuse. She was appointed by New Jersey Governor Phil
20 Murphy to serve on the Advisory Board to the New Jersey Office of Corrections Ombudsperson
21 and on the Inter-Agency Working Group on Body Worn Cameras. While at the ACLU of New
22 Jersey, Ms. Borden served as lead or co-counsel in numerous state and federal cases involving
23 prisons, jails and immigration detention, including as class counsel in the certified class action
24 *Adam X. v. New Jersey Dep't of Corr.*, No. 3:17-cv-00188-FLW-LHG, 2022 WL 621089 (D.N.J.
25 Mar. 3, 2022) (granting final approval of class settlement agreement and awarding attorneys' fees
26 in case involving the Individuals with Disabilities Education Act, Rehabilitation Act, and
27 Americans with Disabilities Act). At PLO, Ms. Borden has served as lead or co-counsel in certified
28 class actions challenging conditions of confinement on behalf of people in prison or jail, including

1 *Armstrong v. Newsom*, 124 F.3d 1019 (9th Cir. 1997) and *Turner v. Cty. of San Bernardino*, No.
2 5:16-cv-00355-VAP-DTB (C.D. Cal. 2016).

3 10. My colleague, Patrick Booth, began working at PLO in 2019 and is now a
4 Supervising Staff Attorney. Mr. Booth received his B.A. from University of California, Berkeley
5 in 2013 and his J.D. from Berkeley Law in 2019. He was admitted to the California State Bar in
6 2019 and has been in good standing with the California State Bar since admission. He is also
7 admitted to practice before the Central, Northern, and Eastern Districts of California, and the U.S.
8 Courts of Appeal for the Ninth Circuit. Mr. Booth has served as lead or co-counsel in certified class
9 actions challenging conditions of confinement on behalf of people in prison or jail, including
10 *Armstrong v. Newsom*, 124 F.3d 1019 (9th Cir. 1997); *Clark v. California*, 123 F.3d 1267 (9th Cir.
11 1997); *Mays v. County of Sacramento*, No. 2:18-cv-02081-TLN-CSK (E.D. Cal. 2018); *Gray et al.*
12 *v. County of Riverside*, No. 5:13-cv-00444 (E.D. Cal. 2013); *Wilson et al. v. Ponce*, No. 2:20-cv-
13 04451 (C.D. Cal 2020); and *Torres et al. v. Milusnic et al.*, No. 2:20-cv-04450-CBM-PVCx (C.D.
14 Cal. 2020).

15 11. My colleague, Alison Hardy, began working at PLO in 1988 and is now a
16 Supervising Staff Attorney. After working at PLO for nine years, during which time she advocated
17 for incarcerated people with health care issues including HIV/AIDS and mental illness, Ms. Hardy
18 moved to Oregon and created a project at the Oregon Law Center focused on improving conditions
19 of confinement for incarcerated people. Ms. Hardy returned to PLO in 2003 and has worked as
20 class counsel in numerous cases involving conditions in prisons and jails. She earned her
21 undergraduate degree from Stanford University, and her J.D. from the University of California, Los
22 Angeles. Ms. Hardy was admitted to the California State Bar in December 1988 and has been in
23 good standing since her admission. She is also admitted to practice before the Central, Northern,
24 and Eastern Districts of California, and the U.S. Courts of Appeal for the Ninth Circuit. Ms. Hardy
25 has served as lead or co-counsel in certified class actions challenging conditions of confinement on
26 behalf of people in prison or jail, including *Plata v. Newsom*, C-O1-1351 TEH (N.D. Cal. 2001);
27 *Armstrong v. Newsom*, 124 F.3d 1019 (9th Cir. 1997); *Jensen v. Arizona*, 754 F.3d 657 (9th Cir.

2014); *Perez v. Tilton*, 3:05-cv-05241-JSW (N.D. Cal. 2005); and *Hall et al. v. County of Fresno*, No. 1:11-cv-02047-LJO-BAM (E.D. Cal. 2011).

12. My colleague, Rana Anabtawi, began working at PLO in 2009 and is now a Senior Staff Attorney. Ms. Anabtawi received her B.A. from University of California, Berkeley in 2005 and her J.D. from Berkeley Law in 2009. She was admitted to the California State Bar in 2009 and has been in good standing with the California State Bar since admission. She is also admitted to practice before the Northern District of California. Ms. Anabtawi has served as lead or co-counsel in certified class actions challenging conditions of confinement on behalf of people in prison or jail, including *Plata v. Newsom*, C-01-1351 TEH (N.D. Cal. 2001); and *Clark v. California*, 123 F.3d 1267 (9th Cir. 1997).

13. PLO has dedicated many hours and significant financial resources to the investigation and research of Plaintiffs' claims—including interviewing Plaintiffs and other members of the Proposed Class to develop the factual record and legal issues underlying this case, interviewing potential expert witnesses, performing legal research about potential claims and relief available to the Proposed Class, and drafting a lengthy and detailed complaint.

14. PLO has dedicated and will continue to dedicate resources to the representation of the Proposed Class.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2025, in Berkeley, California

By: /s/ Margot Mendelson
MARGOT MENDELSON