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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.

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

**DECLARATION OF HILARIO MONTES-
 REGALDO IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY INJUNCTION**

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

12 Defendants.

Declaration of Hilario Montes Regalado, 094810401

1. I, Hilario Montes Regalado, am currently detained at the California City Detention Facility.
2. I am 35 years old and have been diagnosed with anxiety and depression, among other conditions. At Golden State Annex, where I was detained before being sent to California City, I was prescribed medications for anxiety, depression, cholesterol, and to help me sleep. I was also prescribed omega fish oil, and eye drops.
3. I have been detained since August 17, 2023. I arrived at the California City Detention Facility on September 4, 2025 from Golden State Annex.
4. In 2024, my daughter, who is an American citizen, submitted a family petition for me to receive residency. We have not yet received a response to that petition.
5. I am currently housed in a cell with one other person in Unit G-100.
6. When I arrived at California City Detention Center, there were approximately 44 people in my unit. There are now approximately 88 people.
7. There were approximately 44 people on the bus from Golden State Annex to California City with me. We were restrained at our hands and our ankles during the bus ride.
8. When we got off the bus at California City, staff searched me and the other passengers. They had us put our hands against the wall and searched our bodies by patting us down. The officer who patted me down grabbed my genitals during the search. I did not say anything to the officer because I felt afraid.
9. When I left Golden State Annex, I had eye drops, lotions, dandruff shampoo, envelopes, and a sheet of stamps in my property. All of these items were part of my approved property at Golden State Annex. When I arrived at California City, staff reviewed my property with me, and removed all of these items from my property. Staff told me that those items would be replaced at California City. But I still have not received the replacements yet. Staff have told me that I can buy the items from commissary.
10. On the day of my transfer, September 4, 2025, I was provided breakfast of oatmeal and coffee at Golden State Annex at around 5:30 am. After, I was not provided any food or water for many hours. I arrived at California City at approximately midday. We had to stay on the bus, in the sun, for about 2 hours. I did not receive any food until around 8 pm that night. It was a peanut butter sandwich. I did not receive my daily medications on that day.

11. Around 9 pm on that day, having barely eaten or drunk water all day and not having received my medications, I began feeling very unwell, dizzy, my vision began to blur, and I fell to the ground. I lost consciousness for a brief time and fainted while on the staircase in the unit. I remember the guards yelled at me, in English and Spanish, to get up because I was not allowed to be on the stairs. An officer brought a wheelchair for me to use, and staff brought me to a room in the building. A nurse came to examine me and check my blood pressure. The nurse asked me what medications I was on. I told him what medications I took and told him that I had not received my medications yet that day. I usually get my medications at night, and had not received any since the day before at Golden State Annex.
12. On September 16, I felt dizzy, nauseous, and my vision began to get blurry. I also began to feel tremors. I again fell and lost consciousness. I was in G-100. Staff brought a wheelchair and moved me into another room in the building.
13. I was not provided medical care at the detention facility for about half an hour. A nurse saw me but did not provide any treatment or medication. I did not receive any medical treatment until the firefighters arrived. They checked my blood pressure, which was very low, and my blood sugar, which was also very low. They gave me a sweet packet to eat. I began to feel a little better after eating it.
14. The firefighters took me to the hospital emergency room via ambulance. The ride felt very long. Later, I learned that it is approximately one hour away. I was told when I arrived that it was called Adventist Tehachapi.
15. During the ambulance ride, I was chained at my hands and my feet. I remained restrained that way at the hospital. There were two officers from the detention facility with me at the hospital.
16. Doctors at the hospital told me my blood sugar had fallen to 40, and that this was very dangerous and could be life-threatening. I had my blood drawn for tests and the doctor ordered medications. The doctor also ordered that I be provided with a snack every four hours.
17. I returned to the facility between 9 and 10 pm that night. The nurse who had seen me earlier told me that I would be put in an observation cell to be checked on by medical. I was taken to an observation cell. That cell was a dirty room that smelled very bad, full of dirt and dust. There was an area with a shower head but no curtain or privacy, and a toilet. There was a cement bed with a mattress and one blanket, but no sheets. The shower head was not working. I was not provided towels or soap. I remained in this

observation cell for three days, from the night of September 16 until the afternoon of September 19.

18. During my three days in the observation cell, I was not able to bathe or allowed out of the cell. I could not bathe because the shower head did not work and because there was no privacy. I was not provided my medications. The food was mostly potatoes or beans. There were no grievances or medical request forms provided. I was not given my tablet. I asked to use the phone to call my family and my lawyer but they never let me use the telephone.
19. On September 17, in the morning, a nurse came to check my blood pressure. On September 19, a doctor came to see me but did not examine me. He said I could return to the housing unit.
20. On September 17, around 10 am, I told staff that the breakfast I had received was not appropriate because it had a lot of fat, which is not good for me. I asked for appropriate food. A guard returned later and opened the door and threw a sandwich in, like I was an animal. I felt very sad because I had never been treated that way before.
21. I vomited every day that I was in the observation cell. There was a call button to ask for help in the observation cell, but I don't think it worked. I pushed it every day but no one responded.
22. I still have not received my eye drops, omega fish oil, cholesterol medication, or dandruff shampoo.
23. I was in CDCR custody at San Quentin State Prison from May 2005 to February 2007. When I was in prison at San Quentin, I had much more freedom of movement, and could go outside more often. Here, there are 7 counts, at 7 am, 11 am, 3 pm, 7 pm, 10 pm and two more at night. The counts take between one hour to sometimes one hour and forty-five minutes, and we are locked in our cells the whole time. At San Quentin State Prison, I was allowed to wear tennis shoes. At California City, we are only issued plastic sandals. They do not offer protection from the rocks and plants with thorns that are on the yard here.

I, Hilario Montes Regalado, declare under penalty of perjury that the foregoing is true and correct and that this declaration was completed and signed on October 7, 2025 in California City, California.

Hilario Montes Regalado

ATTESTATION OF TRANSLATOR

I am a native Spanish speaker. On October 7, 2025, I reviewed the above declaration with Hilario Montes Regalado in Spanish, which Hilario Montes Regalado represented to me was his preferred and/or native language, and witnessed his signature.

Gabriela Pelsinger

Gabriela Pelsinger, Investigator
PRISON LAW OFFICE

November 24, 2025

Date