

KEKER, VAN NEST & PETERS LLP
 STEVEN P. RAGLAND - # 221076
 sragland@keker.com
 CODY S. HARRIS - # 255302
 charris@keker.com
 CARLOS C. MARTINEZ - # 354616
 cmartinez@keker.com
 633 Battery Street
 San Francisco, CA 94111-1809
 Telephone: 415 391 5400
 Facsimile: 415 397 7188

CALIFORNIA COLLABORATIVE FOR
 IMMIGRANT JUSTICE
 PRIYA ARVIND PATEL - # 295602
 priya@ccijjustice.org
 MARIEL VILLARREAL - # 317048
 mariel@ccijjustice.org
 1999 Harrison Street #1800
 Oakland, California 94612
 Tel: (650) 762-8990

PRISON LAW OFFICE
 MARGOT MENDELSON - # 268583
 mmendelson@prisonlaw.com
 TESS BORDEN - MJP # 805022, *pro hac vice*
 tess@prisonlaw.com
 PATRICK BOOTH - # 328783
 patrick@prisonlaw.com
 ALISON HARDY - # 135966
 ahardy@prisonlaw.com
 RANA ANABTAWI - # 267073
 rana@prisonlaw.com
 1917 Fifth Street
 Berkeley, California 94710-1916
 Tel.: (510) 280-2621

AMERICAN CIVIL LIBERTIES UNION
 FOUNDATION
 KYLE VIRGIEN - # 278747
 kvirgien@aclu.org
 FELIPE HERNANDEZ - # 338468
 npp_fhernandez@aclu.org
 MARISOL DOMINGUEZ-RUIZ - # 345416
 mdominguez-ruiz@aclu.org
 425 California Street, 7th Floor
 San Francisco, CA 94104
 Tel.: (415) 343-0770

CARMEN IGUINA GONZALEZ - # 277369
 ciguinagonzalez@aclu.org
 915 15th Street, NW, 7th Floor
 Washington, DC 20005
 Tel.: (202) 393-4930

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 EDGAR GIOVANNI
 NERI VALDEZ 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 Edgar Giovanni Neri Valdez, 240173335

1. I, Edgar Giovanni Neri Valdez, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility on September 6, 2025, from Golden State Annex.
3. I am 42 years old. I am seeking asylum and CAT in the United States.
4. I am currently housed in G-300 in a cell that I share with another person.
5. Prior to my detention at California City, I was diagnosed with recurrent migraines and pre-diabetes. I was receiving medications for these conditions when I was at Golden State Annex.
6. When I first arrived, I was housed in a dormitory, which I think was F Dormitory. When I was there, I told staff that I was starting to have a migraine.
7. I finally saw a nurse the morning after I arrived. The nurse asked me, “Why didn’t you take your medications?” I told her that I didn’t have any. She gave me one dose of medication for migraines and one for my pre-diabetes.
8. I was moved to G-100. In G-100, whenever a nurse came to that unit, which was every day, I asked for my medications. Each time, the nurse would tell me that there was no record of my medications in the health records. I did not put in a written request for medications because I did not have anything to write with and I did not have a tablet.
9. Some days after arriving, I received a chest x-ray. I do not know why I received a chest x-ray. At that time, I spoke with medical staff—I don’t know who it was—about my medications. Shortly after that, on or around September 16, 2025, I finally received my medications: Propanolol HCL, Metformin, and Excedrin.
10. During the days that I was without my medications, I had severe migraines. My migraines are very painful and make me want to vomit. I become very sensitive to sound and light. I am unable to do anything except lie down in bed and wait about four or five hours until it subsides.
11. When I first arrived to F Dormitory, it was very dirty. There was dust everywhere and the trash bins were full. Other detained people and I cleaned because there was nobody else to clean it.

12. There were mattresses, but there were no blankets. It was very cold. I went without a blanket for about four hours. I only received a blanket after I and others repeatedly asked for one. It was like California City was not ready to house so many people.
13. To request medical care, I now submit handwritten requests or electronic requests on the tablet. If I handwrite the request, I give it to the guard. I have put in a request for dental care because I have broken teeth. The dentist said that they want to pull my teeth.
14. When I arrived to California City, the guards took my deodorant, shampoo, toothbrush, and other hygiene items that I had at Golden State. They also took my food. They gave me a four-inch long toothbrush that is so small it's difficult to use. I have been unable to replace the other items because I cannot afford to buy them at the commissary. Items are more expensive here compared to Golden State. Here, an 8-ounce coffee can is almost \$18, but at Golden State Annex, it was \$8.
15. For the first two weeks I was here, I was not allowed to go outside. Staff told me that I was unable to go outside because there was not enough staff. It was very stressful to not be able to go outside and get fresh air and sun. I think it affected my health. I think the stress triggered some migraines.
16. Here at California City, staff treat us as if we are in a prison. Every time I leave my room or go to the yard, a guard pats me down. Some guards yell at us.
17. The food portions are very small. I'm almost always hungry because I can't buy food from the commissary.

I, Edgar Giovanni Neri Valdez, declare under penalty of perjury that the foregoing is true and correct and that this declaration was completed and signed on October 14, 2025, in California City, California.

Edgar Giovanni Neri Valdez

ATTESTATION OF TRANSLATOR

I am fluent in Spanish and am employed in a bilingual position at the Prison Law Office. On October 14, 2025, I reviewed the above declaration with Edgar Giovanni Neri Valdez in Spanish, which Edgar Giovanni Neri Valdez represented to me was his preferred and/or native language, and witnessed his signature.



November 20, 2025

Amber Norris, Investigator
PRISON LAW OFFICE

Date