

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@ccijustice.org
 MARIEL VILLARREAL - # 317048
 mariel@ccijustice.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 CAMILO
 OREJUELA GUTIERREZ 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 Camilo Orejuela Gutierrez

1. I, Camilo Orejuela Gutierrez, detained at the California City Detention Center, swear the following under penalty of perjury.
2. On June 7, 2025, I had surgery on my knee. I had been experiencing pain in my knee for many months, and a doctor at Golden State Annex said I needed surgery. It took several more months to arrange the surgery. After the surgery, I was told that I would need therapy and other treatments to regain mobility and prevent infection. To date, I have not had any therapy or treatment for my knee. My knee is very painful, I have a hard time walking, and I am trying to do therapy of my own invention to see if it gets better. My knee is swollen, yellow/purple in color, and feels hot to the touch. The nurses here at California City tell me that it is not okay and that I need to see the surgeon who performed the surgery or a specialist.
3. On August 28, 2025, without prior notice, I was transferred with other detainees from Golden State Annex to the California City detention center. We immediately realized that California City was not ready to receive people: many things were still unfinished, there were almost no services, and many people who worked there did not know what they needed to do. A worker told me that California City wasn't actually expecting to receive anyone until November, and she didn't know why they transferred us so soon, without having the detention center ready.
4. In California City, there are 88 of us per area, and there are three areas per building. Each area has 44 cells that you share with one other person. But they are very old cells that haven't been repaired in a long time.
5. The conditions at Golden State Annex were very bad, and I never want to go back there, but California City is even worse. Everything is missing, not ready, or they don't have it. Even the guards are rougher and talk to you very badly; no one wants to help you with anything. They charge you money for basic services, such as printing a legal document, there is no library, and when you have Zoom calls with your lawyer, the network almost always fails.
6. I have asked almost every day for someone to check my knee or tell me what therapies I need to do to heal it properly and walk better. So far, no one has listened to me. What's more, they tell me they don't have access to my medical records from when I was at Golden State Annex. They don't know what surgery I had, what I need, nothing. They just give me pain pills that are very strong and make my head feel worse.
7. I am suffering a lot from the pain and not being able to walk well. I can't just take pain pills every day; that does a lot of damage. There are not enough medical services in California City. A man in my area told me that he has heart problems, and without his medication, his heart will fail and he will die. He has been asking for his medicine for weeks and no one is listening to him. At any moment, if there is too much intensity or movement, he could have a heart attack.

8. Another man in my area has lost sight in one eye because he has not been given the medicine he needs. He will never be able to see out of that eye again, and it could have been prevented with minimal medical care.
9. I have heard several other stories of people who are in very serious health conditions, at risk of dying, and those in California City are doing nothing to provide them with the medical services they need. A nurse told me that two people had already died since we were transferred to California City. An Asian man hanged himself while he was in the “hole”—he committed suicide. Another man, according to her, died because emergency medical services did not arrive in time.
10. Three days ago, on September 30, 2025, the sink in my cell started leaking and flooded the cell. When I tried to leave the cell, I slipped on the water on the floor and hit the cell door. I felt a pop in my knee again and a lot of pain. They took me to a hospital, but they only had an X-ray machine there. They told me that my bones were not broken. I told them that I had ACL surgery a few months ago and that I needed an MRI to check my ligaments. The hospital and California City said that was not possible. I don't know when I will be able to get an MRI, but my knee is even worse than before. I need help and to get out of here, because in California City they don't want to give us any medical help.
11. The sink pipe in our cell is still leaking. They haven't fixed it, so I still have water on the cell floor and I could slip again at any time. My cell roommate helps me get in and out of the cell. We are inside our cells for 13 hours a day, and they give us one hour a day of yard time. When it rains, drops also fall from the ceiling and other parts of our area flood. It is very dangerous and harmful for me to walk anywhere with my knee like this and water everywhere.
12. There are people here in California City who have been in very harsh prisons and say that the conditions here are the worst they have ever experienced.
13. The system for receiving money from outside is also very difficult. They only let us see if someone has put money in our account on Saturdays or Sundays, and on Mondays or Wednesdays we can transfer it and use it. If someone puts money in my account on Monday, I can't use it to make calls until a week later. That makes it very difficult to maintain communication with family and especially with our legal representatives.

Sworn under penalty of perjury on the 6 day of the month of October in the year 2025.

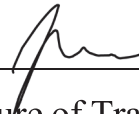
Signed

Certificate of Translation

I, Jonathan Mulligan, am bilingual in English and Spanish and am competent to translate from Spanish to English. I hereby certify that the translation of the foregoing declaration of Camilo Orejuela Gutierrez is true and accurate to the best of my abilities.

October 30, 2025

Date



Signature of Translator