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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 DALER SINGH 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 Daler Singh, 203604657**

1. I, Daler Singh, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility on about September 1 or 2, 2025, from Mesa Verde, where I had been for about a month. Before that, I was detained at Golden State Annex for about six to seven months. I was taken into ICE custody on January 28, 2025, at an immigration check-in in Sacramento.
3. I am seeking asylum in the United States.
4. I am currently housed in Unit E-200, in a single cell, while being monitored for a hunger strike.
5. At California City, I am not receiving the medical care that I need. Before I was detained by immigration authorities, I was diagnosed with a chronic stomach ulcer in 2020. I am taking medication several times per day and must frequently be on a liquid diet. Before being detained, I was taking five to six medications multiple times a day: one was up to four times a day, others less often. While I was at Mesa Verde and Golden State Annex, I received my medication and diet as prescribed, and my condition and symptoms were not as bad as now.
6. My stomach ulcer causes severe stomach pain, severe chest pain from heartburn, and sometimes vomiting or coughing up blood. It can also cause bloody stool when untreated. These are all symptoms I have experienced here at California City.
7. Before I arrived at California City, I was told by Mesa Verde staff that my medical records and medication transfer with me. During my intake exam, I told the nurse about my ulcers, my liquid diet, and the medications I need. I did not receive my medication that first day, and I had severe chest pain that night. The next day, I saw a doctor at the facility because my pain was a 10 out of 10.
8. Since then, I have not received my medication regularly. Sometimes I receive only half of the pills I am supposed to get in a day, and sometimes none at all.
9. I continue to experience stomach pain, bloody stool, and bloody cough. I experience stomach pain and cough up blood almost daily. I have bloody stool at least three times a week. I did not have these symptoms when I was in the free community and it has gotten progressively worse since I was placed in detention.

10. I have also developed mouth sores and ulcers since May 2025, which have gone untreated.
11. I have asked for help and was told I would be seen by the gastrointestinal specialist (“GI”) while I was at Mesa Verde and Golden State, but I transferred before I could be seen.
12. Since arriving to California City, I have filed approximately 15 sick call requests, both on paper and on the tablet system, about the lack of medical care; some go unanswered and others receive responses that say something like “you will be seen” but my medical issues go unaddressed. One request I filed electronically on September 18, 2025, remained marked as “pending” weeks later. The tablet flags the sick-call as pending because no one has responded to it yet. It is my understanding that we are supposed to receive a response to our “sick calls” within five days. I also do not think that telling me that I will be seen later is a sufficient response.
13. I participated in a hunger strike with one other detainee from about September 18 to September 27 or 28, 2025. We went on hunger strike because we were not receiving medical care, there was no yard time, we were often locked down, and we were not receiving mail.
14. On September 22, I vomited blood. A nurse came that night and told me there was no doctor until the next morning. I fainted and had chest pain the next day, and a “code blue” was called on September 23. A “code blue” is a medical emergency and medical staff are expected to respond to the unit.
15. Medical responded to my housing unit and I was taken to the medical clinic. My vitals were taken and I was kept in the medical clinic for two to three hours. I spoke to the Health Services Administrator, Ms. White, while I was in the medical clinic. I explained that I needed proper medication and to be seen by the GI. I was told that I would be seen by the specialist. That did not happen.
16. I did not receive my medication the evening of September 23, so I continued my hunger strike. After that point, officers and medical staff told me repeatedly that if I did not eat, I would not get medicine. On September 24, an officer told me I would get an appointment with a doctor if I stopped the strike. On September 25, a nurse said the doctor told her, “If you don’t eat, no medicine.” On September 26, a captain told me again that I would only get pills if I ate.
17. I was placed in a single cell during the strike and received almost no medical attention except one time after fainting. Over the course of the strike, I lost about 7

pounds. I ended the strike after the captain told me that medical would get me seen by the GI and that I would receive the proper liquid diet.

18. I looked up the National Detention Standards to learn the rules about hunger strikes. The facility did not follow the National Detention Standards rules for hunger strikes. They did not consistently measure my height or weight or medically monitor me during the strike.
19. The September hunger strike is now over, but I have still not been seen by a GI. On or about October 7, 2025, I saw a doctor at California City who told me there would be no GI appointment and that I should go back to my country to get the medical care I need. I continue to have severe pain, bloody stool, and difficulty eating.
20. On October 14 around 9:15 am, I had blood in my stool and I notified the officer in my building. The officer (Officer Grove) came to check the toilet to see the blood and called medical. Medical did not come. So, at 10:36 am, the officer called "code blue" and medical staff, including a nurse, came and took me to the medical clinic. I stayed in the medical clinic for three to four hours before I was taken offsite to an emergency room. The hospital took a chest x-ray and vitals and discharged me back to California City. The next day, I spoke to the Health Services Administrator and she said she would let me know the date for when my GI appointment is scheduled. I have not heard back from her. I also saw the doctor the same day but all he did was check my vitals and cleared me to go back to unit.
21. I began a second hunger strike the evening of October 20, 2025. I was moved to a single cell to be monitored the same night. I am engaging in a hunger striking because I continue to not receive the medical treatment and diet that I need.
22. I am supposed to be on a liquid diet. I am concerned that I am not getting sufficient calories. I have lost 17 pounds since I arrived to California City. On a typical day, I get a cup of coffee and tea, a cup of Jell-O, and some broth. Medical gives me three Ensure a day.
23. When I first arrived to California City, I was taking medication Hydroxy and Zoloft for anxiety and depression. I was receiving similar medication before being detained, and received it at Golden State and Mesa Verde. I did not get the medication for the first few days at California City, but then received it for a couple of days before it was discontinued. I was told I needed to see the psychiatrist before it could be re-ordered. After my first hunger strike, I was seen by the psychiatrist and I was finally restarted on my medication in the beginning of October. I had a difficult

time sleeping without the medication. Even though I am now receiving it, I am feeling so unwell medically that I am still unable to sleep.

24. I am a practicing Sikh. I have been practicing my entire life.
25. My faith requires that I keep my uncut hair (kesh) and wear certain religious items, including a steel bracelet (kara), a wooden comb (kanga), and special undergarments (kachera). At Mesa Verde and Golden State Annex, I was allowed to have all of these items except for my ceremonial sword (kirpan), which I understand is not permitted in detention. California City does not allow me to have my possessions, including my bracelet, comb, and undergarments.
26. I feel sad and depressed that I cannot practice my religion freely. I feel disconnected from my religion. There are other practicing Sikhs in detention with me who are experiencing the same thing. Those who have been able to keep their bracelets upon arrival to California City were only able to do so because it could not be physically removed.
27. I have asked the chaplain for these items, but I have not received them. She says that she is a temporary chaplain and to wait for the permanent one to ask again. These articles are very important to my faith and religious practice.
28. My faith also requires a weekly congregate prayer. Although we were able to engage in this religious practice at Golden State Annex and Mesa Verde, we have not been able to do this since arriving to California City.
29. There are certain staff members I do not feel safe around. On September 30, 2025, around 2 pm, I asked an officer for a copy of the hunger strike protocol. In response, the officer pushed me aggressively in the dayroom and continued to push me out of the room. I do not feel safe being around her.
30. On October 9, 2025, another detainee tried to commit suicide. Other detainees were screaming for help so I stepped out of my cell to see what was happening. A staff member who was holding a drill doing maintenance work approached my cellmate and I with the drill and threatened us by telling us to get our “ass inside the cell” or “I can make a hole in your chest.” I submitted a grievance on this incident but have not heard back. Staff attempted to give me a write-up about the incident but dismissed it when they learned that he was holding a weapon (the drill) in his hands.

31. Because of these conditions, my health has worsened and I continue to suffer pain, weakness, and emotional distress. I am worried about my health and about being able to practice my religion properly while detained.
32. When I arrived to California City, no one asked me if I had any disabilities or required any accommodations.

I, Daler Singh, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed at California City, California this 10-21-2025 day of October 2025.

Daler Singh