

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 FERNANDO VIERA
 REYES 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 Fernando Viera Reyes, 074334561

1. I, Fernando Viera Reyes, am currently detained at the California City Detention Facility.
2. I arrived to California City Detention Facility about late-August 2025, from Golden State Annex, where I had been for about 17 months.
3. I am seeking asylum in the United States.
4. I am currently 50 years old.
5. I am currently housed in Unit G-200, Cell 118 in a double cell with one other detainee.
6. Prior to coming to California City, I was at Golden State Annex for about 17 months. Soon after my arrival at Golden State Annex, I completed blood work that showed elevated PSA levels. I was given a course of antibiotics and given Flomax to help with my urine output. I received a repeat blood draw to see if those medications brought down my PSA levels. The lab work showed that my PSA levels were still high. A few months later, my PSA levels were even higher. The doctor at Golden State Annex explained to me that high PSA levels could mean cancer.
7. I was seen by a urologist and underwent some testing to determine whether I have prostate cancer. I had an ultrasound, cystoscopy, and two MRIs completed.
8. I had an MRI completed in November 2024 which indicated that there was a high likelihood that I had cancer and that clinical correction was needed.
9. I saw a urologist in January 2025 and she wanted me to do a prostate biopsy. It did not happen. I saw her again on March 17, 2025. She wanted to do a biopsy two days later. She said it needed to happen right away. She requested that I be NPO and start Cipro the next day. I was not seen then and I do not know why. I asked and was told by medical staff at Golden State Annex that the biopsy was ordered and I would have it done. I left Golden State before it could be done.
10. Since late 2024, I have had symptoms of burning with urination and an inability to empty my bladder. It has only gotten worse, even with the Flomax. It is painful to use the restroom and I go frequently. A few weeks before my arrival to California City, I began to experience bleeding with urination.

11. When I left Golden State Annex, I was still waiting for my prostate biopsy and I was prescribed Flomax. I let the intake nurse at California City know about my biopsy and that I needed Flomax. I let her know about my symptoms and that I experienced bleeding with urination and in my stool. She told me that I would see the doctor soon and that I could explain to them. I put in multiple sick-call slips that I was bleeding with urination and in my stool because it was taking too long to see the doctor.
12. When I arrived at California City Detention Facility, I and other new arrivals lined up inside a lobby, and an intake nurse asked us some questions following a form or checklist. We were not in a clinical setting or even a private area. Conversations with the nurse could be heard by other people waiting in line. The nurse asked me if I had any medical issues, if I had a history of suicide attempts, and if I planned to hurt myself or others.
13. When I told the nurse about my medical issues, I also let her know that I take Flomax, because I was concerned about accessing my medication. The nurse told me that I would see a doctor eventually, and that I could ask the doctor about my medical issues and medication. My conversation with the nurse lasted less than five minutes. To my knowledge, I was not tested for tuberculosis. The nurse did not take or order any labs. They did not tell me about how I could access health care, just that I would see a provider eventually. I did not know what forms to use to request medical care, and no one made those forms available to me. I did not know how to request medical care for about two weeks, despite asking staff and pill call nurses how to do so.
14. I was given my Flomax on and off when I arrived. It was very difficult and painful to urinate without it, and I let medical staff know multiple times verbally and through sick-call slips. But it didn't always help. It was not until three to four weeks ago that I received my own KOP bottle of Flomax. I am having such a difficult time urinating that I sometimes take double the amount of recommended pills.
15. Even though I put in sick-call slips reporting my symptoms, I was at California City for weeks before I was seen by a doctor. He had no record of any of my medical issues. I explained my symptoms to the doctor, and the doctor said that I would have to re-do the tests before I could get a biopsy. Even though the doctor told me he was going to order lab work, he did not.
16. I put in a sick-call slip a week later and explained that I was experiencing bleeding with urination and in my stool. I was seen by a nurse who called the

doctor and the lab work was then ordered. I was not given the results of my lab work until I turned in another sick-call explaining that I was still bleeding and experiencing pain and pressure in my rectum. I was then seen by a doctor in mid-October who told me that my PSA level has increased from around 17 at Golden State Annex to 74. There was also blood in my urine. He told me that he would refer me again to a urologist. I am very concerned that I have prostate cancer and it is taking a very long time to get it diagnosed and treated.

17. As of today, I have not been seen by a urologist at California City or had my biopsy that was recommended in March 2025 completed. I am in a lot of pain every day. I struggle to urinate without pain, and I continue to pass blood in my urine and stool. I asked the doctor for pain medication and I was prescribed Vitamin C. Others have told me that if I want Tylenol, I will need to pay for it at the commissary.
18. On or around mid-September, I signed some papers to allow medical staff at California City to get my medical records from Golden State Annex. But during my appointments with the medical staff at California City, they have never mentioned my medical records from Golden State Annex.
19. When I arrived to Golden State Annex, I experienced a lot of anxiety and depression. It interferes with my sleep and I feel hopeless. At Golden State Annex, I saw a mental health doctor regularly to talk about how I was feeling. I was prescribed a medication for anxiety and depression, and another medication to help me sleep. I do not remember the name of the medications but I believe one of them was Zoloft. When I arrived to California City, I was still receiving these medications for the first few days. But within the first two or three days after I was brought to California City, I was no longer issued the medication that helps me sleep. I went to pick it up from the nurse, but it was no longer there. I did not meet with the psychiatrist before medical staff stopped issuing me that medication. I put in a sick-call slip about it, but I was never seen.
20. My depression and anxiety medication was stopped about three weeks ago. I put in a sick-call slip asking about my medication, and I was just seen recently by a psychiatrist. The psychiatrist told me that I needed to speak to someone else about my medication.
21. I still do not receive either medication. I am having a difficult time sleeping without it, and my anxiety is not well managed.

22. Before I was brought to immigration detention, I was in prison. The conditions at California City are worse.
23. We spend most of the day in our building. We have access to the yard about one hour a day in the early morning when a number of people are still asleep. Otherwise, we are in our building, even during meal time.
24. All we have to do in our building is to watch TV. We have no programs or groups to participate in. We cannot take education classes. We cannot have contact family visits. We just sit in the dayroom when we leave our cell. In CDCR, I was group A1A and I had a job, I was able to program regularly, and I spent much more time on the yard.
25. We have four counts a day where we must stay inside our cells and the doors are locked. Each count can take an hour or more.
26. About three weeks ago, there was an incident in another building where someone tried to hang himself. We heard he left a note that said he would rather die in America than be deported.
27. We do not get enough food to eat. The portion sizes are small and I am still hungry after I eat. Things at the commissary are very expensive – almost twice as much as what it cost in CDCR. I have lost seven to eight pounds since I got here.
28. The water tastes funny and smells. We have complained about the quality of the water and were told by staff that is normal, and it's just the chemicals they use to clean it.

I, Fernando Viera Reyes, declare under penalty of perjury that the foregoing is true and correct and that this declaration was completed and signed on October ____ 2025 in California City, California.

A handwritten signature in black ink, appearing to read "F. Viera Reyes", is written over a horizontal line. The signature is stylized with several loops and a long horizontal stroke at the end.