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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 VISHAL 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

DECLARATION OF VISHAL IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
 INJUNCTION

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

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.

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DECLARATION OF VISHAL IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION

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

EXHIBIT A

Priya Arvind Patel (SBN: 295602) (she/her)
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Pro Bono Counsel for Petitioner-Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

VISHAL,

Petitioner-Plaintiff,

v.

CHRISTOPHER CHESTNUT, in official
capacity as Facility Administrator of
California City Detention Facility,

SERGIO ALBARRAN, in official capacity
as Acting Field Office Director of the
Immigration and Customs Enforcement,
Enforcement and Removal Operations, San
Francisco,

TODD LYONS, in official capacity as
Acting Director of Immigration and
Customs Enforcement;

KRISTI NOEM, in official capacity as
Secretary of the Department of Homeland
Security; and

PAM BONDI, in official capacity as
Attorney General of the United States,

Respondents-Defendants.

No. _____

DECLARATION OF VISHAL

1 I, VISHAL, hereby declare as follows:

2 1. The facts contained in this declaration are known personally to me, and if called to
3 testify, I could and would testify competently thereto under oath.

4 2. My name is Vishal. I do not have a last name. Immigration uses my first name as
5 my last name.

6 3. I fled India because members of the ruling party there persecuted and tortured me
7 for my work as an organizer in an opposition party. I submitted a declaration explaining more about
8 what happened to the Immigration Judge, which my current lawyer is filing.

9 4. I entered the U.S. last year by walking across the border and asking for asylum.
10 Immigration detained me, and I have been in detention since.

11 5. My uncle in the U.S. got me a lawyer, and I went in front of the judge to ask for
12 asylum. I did not get asylum, but I won my case on March 17, 2025. We did not appeal.

13 6. Before I won my case, I would ask ICE about parole process, and they said that we
14 do not believe you are from India or who you are. They had my ID documents, but still they said
15 that they didn't believe me.

16 7. After I won my case, I tried to ask them about my release again with ICE, around
17 twenty to twenty-five times, whenever they would come into the detention center.

18 a. When I won my case I was at a different detention center called Golden State
19 Annex. I remember ICE came one month after I won my case, around April.
20 When I tried to talk with them about my release, they told me, we will try to find
21 another country to deport you to. They didn't say any specific countries, and did
22 not give me any papers.

23 b. After that, there were multiple times I tried to talk to them, and they told me the
24 same thing. While at Golden State, I tried to talk to them whenever they came
25 every Wednesday. If they gave me time, they would say, we will try to find
26 another country for you. Sometimes they would just come in the dorm and call
27 some people and then go out, and wouldn't let us talk to them.

28 c. Sometimes I would send requests by tablet asking about my release. I sent them

1 messages 10-15 times, but they only responded three times. First time they said,
2 we're trying to find another country. Second time, they said, there is an issue at
3 headquarters. Third time, they replied your attorney filed a stay and it is still
4 pending, but I do not believe that my attorney filed anything like that.

5 d. Since June 2024, I have been detained at a different detention center called
6 California City. Last month when ICE came, I tried to talk to them but they
7 ignored me and said, send us a request on the tablet we don't have time to talk
8 with you. I sent a request on the tablet, but they replied that they were trying to
9 find another country. They did not say which country.

10 e. Of all the times that ICE officers spoke to me, they only ever named one other
11 country but I think he was confused about who I am. This was when I was at
12 Golden State, around four months after I won my case. When I asked him about
13 my case, the officer told me, I am waiting for your travel documents from
14 Bangladesh, and I said, I'm not from Bangladesh, and he said, I don't know but
15 the system says Bangladesh. After that, they would say, we are trying to find
16 another country, but never said a country.

17 f. They also have never given me any papers or asked me to sign anything.

18 g. Here at California City, ICE doesn't come very often just to talk, it's mainly just
19 to take people out of the dorm to deport them. I sent them a message on the tablet
20 on September 26. I said, it's been five and a half months and my case has been
21 granted. I told them that also my family and I are suffering. My mom is
22 depressed, and I myself am also experiencing mental health conditions. Around
23 October 3 or 4, they replied and said, there is an issue at headquarters and we
24 are working on moving you to a third country, and they asked me whether I had
25 family in any other countries. I do not have family, let alone residency status, in
26 any third countries.

27 h. Around two weeks later, an ICE officer named Mr. Munoz came into the
28 detention center. Mr. Munoz said that I could only be released on bond if I got

1 a court order. Mr. Munoz said that they are also trying to see if there is any third
2 country that will accept me. He did not name any country. I also asked how long
3 it takes to find a third country, and Mr. Munoz said that this process does not
4 have a minimum or maximum time, and that it can take a long time.

5 8. I have been suffering a lot in detention. They put me in isolation last month for
6 around five days because I was protesting not getting medical care; I have problems with my back
7 and spine. I went on hunger strike. They told me that they would give me medical care if I broke
8 my strike—that they would give me physical therapy and take me to a doctor outside. And so I
9 broke my strike on September 26. But they never gave me any of that. They have just been giving
10 me ibuprofen.

11 9. I'm not the only person suffering here, everyone is, and seeing that makes me feel
12 worse. Someone in my dorm hanged themselves recently. He was a good person. He had greeted
13 me that day in a normal way, and then one hour later we found him hanging from the top of his
14 cell. I felt really bad. The conditions here are so bad that people are killing themselves. It's not just
15 the medical care, the people who work here are very rude to us and threaten us. The day the person
16 hung themselves a maintenance worker was threatening to hurt us with his drill.

17 10. I have no criminal record in the U.S., India, or anywhere else, and I have never been
18 involved with drugs, firearms, or terrorism.

19 11. It is also my understanding that my uncle, a U.S. citizen and California resident,
20 continues to want to sponsor me and would support me if I am released. If I am released, I will go
21 live with my uncle.

22 12. I understand the importance of following the law in the United States. My goal is to
23 remain in safety with the permission of the United States. I understand that if I am ordered finally
24 removed to another country—after having the opportunity to assert a fear-based claim, if I have
25 one—I must cooperate with the U.S. government. I would cooperate.

26 13. If released, I promise to attend any ICE check-ins and comply with their orders and
27 any other conditions of supervision.

28 I declare under penalty of perjury under the laws of the State of California that the foregoing

is true and correct to the best of my knowledge, memory, and understanding.

Dated: October 24, 2025

/s/ Vishal

Vishal

(original signature retained by attorney Priya Patel)

CERTIFICATE OF INTERPRETATION

I, Priya Arvind Patel, certify that prior to its filing, this declaration was read in its entirety to Vishal, and that Vishal agreed to and understood its contents, by Mohammad Zaid, #83996368 of WorldWide Interpreters in the Hindi language via telephone.

Date: October 24, 2025

/s/ Priya Arvind Patel

Priya Arvind Patel