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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 GENESIS FABIAN
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 Genesis Fabian

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I work for the Asian Law Caucus as a paralegal. My organization focuses on immigration law and provides legal representation to both detained and non-detained immigration clients. I have been employed there for a year and a half.
3. A large component of my work involves communicating with existing or prospective immigration clients, including detained clients. As part of that work, I support drafting declarations from our clients in support of their habeas or other petitions, conduct initial screenings for clients who call our office, and provide referrals and resources as needed.
4. I currently work with two detained clients. One of them is currently detained at the California City Detention Facility.
5. On September 24, 2025, I sent an email to CalCityAttorneySchedule@corecivic.com to request a virtual attorney visit (VAV) with our client. In my experience setting up VAVs at other detention facilities like the Mesa Verde ICE Processing Center and the Golden State Annex Detention Facility, I usually receive a response within 24 hours of sending a request. I did not receive any response from the California City Detention Facility.
6. On September 29, 2025, I followed up with the California City Detention Facility by email and by phone to schedule the VAV. Ultimately, I was able to reach somebody by phone who scheduled a VAV for October 1, 2025.
7. On October 1, 2025, I joined a zoom call with my client. The call was plagued by audio issues. My client could not hear me well either because the audio was too low or because the audio cut off. My client had to ask a guard for headphones. Even with the headphones, the audio quality was poor. The call lasted an hour but we spent at least 15 minutes, or 25% of our allotted time, troubleshooting audio issues and repeating ourselves.
8. My request for a VAV was urgent because I needed to prepare a declaration for my client in support of his habeas petition. Because of the delay in scheduling the VAV, there was likely an approximately one-week delay in filing our client's habeas petition.

9. In my experience preparing declarations with clients, it is vital that audio is clear. It is necessary for my client to understand what I am asking and for me to hear what my client is saying so that I can effectively work with them to prepare a declaration to be filed in court. A declaration is subject to perjury laws and so it is especially important that my client understands what I am saying and can respond to my questions. The audio issues with the VAV I had with my client on October 1, 2025, led to a lower quality declaration because of the time lost to troubleshooting audio problems or repeating ourselves.

I, Genesis Fabian, 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 San Francisco, CA this sixteenth day of November 2025.

A handwritten signature in black ink, appearing to read "Genesis Fabian", written in a cursive style.