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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 ESTEBAN
ALVAREZ-MORA 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 Esteban Alvarez-Mora, 240170125

1. I, Esteban Alvarez-Mora, am currently detained at the California City Detention Facility.
2. I am 39 years old.
3. I'm seeking asylum in the United States.
4. I am currently housed in a cell with one person in Unit G-100-103 lower.
5. I have been detained since March 19, 2025. I arrived at California City Detention Facility on September 4, 2025, from Golden State Annex in McFarland, California.
6. When I arrived, I had an infection and I had five different abscesses: two on my right leg, two on my right glute, and one on my left glute. Each abscess was about two or three inches in diameter. The abscesses felt very hot to the touch and I had chills. I felt like I had a high fever. The pain of the abscess was so bad that I had a very hard time sleeping for almost a month.
7. When I was being transferred from McFarland to California City, I was seated on a bus for two and a half hours. After I arrived at California City, I sat for a long time while waiting to be processed for about three hours. Because I sat for so long, the abscesses started leaking pus and blood. I cleaned the abscesses myself.
8. When I finally was able to have an appointment with medical staff, I saw a nurse. The nurse told me that I would urgently see a doctor the next day, but I did not see a doctor or any other medical staff member that day. I showed the nurse that the bandage on my glute was completely soaked with blood and pus. After showing her, I threw it in the trash, but she did not give me another bandage. In order to protect the wound, I used the back of another already soiled bandage that I had. The nurse was disorganized. She only asked me questions about my medical history but did not examine me other than take my vitals. She told me that my blood pressure was high.
9. I had been prescribed antibiotics for the abscesses at McFarland, but I only had them for one day before I moved to California City. I was finally issued antibiotics for my infection over 10 days after I arrived at California City, after I had requested them several times.
10. I did not see the doctor at California City before I received the antibiotics. I believe I received them because I already had an order for them at McFarland. Although I have told the doctor about the abscesses at appointments for other matters, the doctor has never addressed the abscesses. Even though the abscesses are gone now, I still have hard masses where they used to be, and those masses leak blood sometimes.

11. This is the first time that I have had abscesses in my entire life. They started to develop about a week before I was transferred from McFarland to California City. I put in medical requests at that facility so that medical staff would evaluate me and treat the abscesses, but medical staff at that detention facility told me that they would not treat the abscesses yet because the abscesses were too hard to be drained. When I finally saw a doctor at California City, he did not look at the abscesses. He only took my vitals and examined my chest and lungs. I still have not received a comprehensive medical exam for the abscesses.
12. I have put in requests to see the doctor again because I have had chest pains. I have a wet cough and it is painful when I cough.
13. In order to request medical care, I fill out a form and give it to the guard. There are boxes where I could put my medical care requests, but they are not confidential. If I put my request there, any other person who is detained could see what it is about. I prefer to hand it to the guard so it can be more private.
14. Many of my requests to see the doctor are not answered. Today, I submitted another request about the chest pain and about the mass on my glute, but I haven't had any response. I saw Dr. Hooper around the start of October 2025 about my chest pain. He listened to my chest and I told him about tuberculosis. He didn't say anything to me about my chest pain. He only gave me antibiotic cream for another problem.
15. The drinking water at California City is very dirty and looks unsafe to drink. The cells in our building have faucets, but I do not drink water from the faucet because the water smells bad and looks dirty. It tastes bad, as if it had been sitting for a long time. Staff bring in igloos of water for us to drink, but that water is the same as the tap water. I don't know why they bring it. Bottled water costs \$1.50, but I need to save all of my money to make phone calls. I am not able to afford bottled water from commissary.
16. The food portions are very small. Before, we were given more food, but now for about 22 days, we've been given much smaller portions. I'm always hungry. It's very difficult to buy any food from the commissary because it is expensive and because I don't have an income since I'm detained.
17. California City staff threw away a lot of my hygiene supplies and food when I arrived, even though I was able to use those supplies at the previous detention facility where I was detained. For example, my shampoo and lotions were thrown out because they had already been opened when I was at intake. California City staff also threw away my toothbrush, toothpaste, and deodorant when I arrived. It's difficult to replace it because things are very expensive here. Staff gave me another toothbrush but it's very small and almost unusable.

18. I clean my own cell. When I arrived, it was very dirty. It was like they had not cleaned since the prison had closed. There was so much dust. During the first 22 days I was here, there were no detained people assigned to clean, so I and other detained people cleaned it.
19. In my opinion, this facility is not prepared to house as many people as are currently housed here. The people working in intake didn't seem to know how to do the intake when I arrived. They were not organized. They didn't know what questions to ask. For those of us who were sick, they didn't do anything to help us.
20. This declaration was read to me in my native language.

I, Esteban Alvarez Mora, 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 14 day of October 2025.



ATTESTATION OF TRANSLATOR

I am fluent in Spanish and am employed in a bilingual position at the Prison Law Office. On October 14, 2025, I reviewed the above declaration with Esteban Alvarez-Mora in Spanish, which Esteban Alvarez-Mora represented to me was his preferred and/or native language, and witnessed his signature.



Amber Norris, Investigator
PRISON LAW OFFICE

November 20, 2025

Date