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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.

U.S. IMMIGRATION AND CUSTOMS

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

**DECLARATION OF CODY S. HARRIS  
 IN SUPPORT OF PLAINTIFFS' MOTION  
 FOR TEMPORARY RESTRAINING  
 ORDER**

Date: To be set by the Court  
 Time: To be set by the Court  
 Dept.: Ctrm 7 – 19th Floor  
 Judge: Hon. Maxine M. Chesney

Date Filed: November 12, 2025

1 ENFORCEMENT; TODD M. LYONS,  
2 Acting Director, U.S. Immigration and  
3 Customs Enforcement; SERGIO  
4 ALBARRAN, Acting Director of San  
5 Francisco Field Office, Enforcement and  
6 Removal Operations, U.S. Immigration and  
7 Customs Enforcement; U.S. DEPARTMENT  
8 OF HOMELAND SECURITY; KRISTI  
9 NOEM, Secretary, U.S. Department of  
10 Homeland Security,

11 Defendants.

1 I, Cody S. Harris, declare as follows:

2 1. I am an attorney licensed to practice in the State of California. I am a partner at  
3 Keker, Van Nest & Peters LLP, and I represent Named Plaintiffs Yuri Alexander Roque Campos  
4 and Fernando Viera Reyes in this action. I submit this declaration in support of Plaintiffs' Motion  
5 for Temporary Restraining Order. I have personal knowledge of the facts set forth herein, and if  
6 called to testify as a witness thereto under oath, I could competently do so.

7 2. I submit this declaration pursuant to Civil L.R. 65-1(a)(5).

8 3. On December 1, 2025, I filed Plaintiffs' Motion for Preliminary Injunction, which  
9 sought, among other relief, a detailed plan to ensure adequate medical care for the Named  
10 Plaintiffs and putative class members. Two of those Named Plaintiffs are Yuri Alexander Roque  
11 Campos and Fernando Viera Reyes.

12 4. On December 2, 2025, I and other Plaintiffs' counsel held a telephone call with  
13 Assistant U.S. Attorney and Civil Chief Pamela Johann about our just-filed motion. On that call,  
14 Plaintiffs' counsel specifically identified Messrs. Roque Campos and Viera Reyes, explaining that  
15 these two plaintiffs were in need of urgent medical attention for the reasons set forth in Plaintiffs'  
16 preliminary injunction motion.

17 5. Upon information and belief, in the ensuing weeks, neither Mr. Roque Campos nor  
18 Mr. Viera Reyes has seen a specialist or received the urgent medical treatment they require.

19 6. At 10:55 a.m. on December 15, 2025, I sent an email to counsel for Defendants,  
20 Savith Iyengar, alerting him to Messrs. Roque Campos and Viera Reyes' deteriorating medical  
21 conditions and lack of specialist medical attention since the filing of the Motion for Preliminary  
22 Injunction. I notified Mr. Iyengar that Plaintiffs' counsel planned to file a motion for a temporary  
23 restraining order that week, asking the Court to order Defendants to immediately ensure that  
24 Messrs. Roque Campos and Viera Reyes see medical specialists and receive appropriate medical  
25 treatment and follow-up. I asked Mr. Iyengar to let us know if his clients would provide that  
26 relief. I told him to otherwise consider my email a courtesy notification that we would be filing a  
27 motion for a temporary restraining order.

7. At 12:46 p.m. that same day, I received an email response from Mr. Iyengar acknowledging receipt of my email and informing me that he had been following up on my requests for Messrs. Roque Campos and Viera Reyes with his clients. He stated he would keep me updated as soon as he receives further information. A true and correct copy of my email and Mr. Iyengar's response is attached hereto as **Exhibit A**.

8. At the time of signing this declaration, I have received no further response from Mr. Iyengar or the U.S. Attorney's Office. Nor have I received information leading me to believe that Defendants have scheduled the necessary medical appointments for Mr. Roque Campos or Mr. Viera Reyes.

9. Upon filing the TRO motion, I will personally send as-filed copies of the motion and all supporting papers to Mr. Iyengar via email.

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct. Executed on December 16, 2025, in San Francisco, California.

/s/Cody S. Harris  
Cody S. Harris

# Exhibit A

**From:** Iyengar, Savith (USACAN) <Savith.Iyengar@usdoj.gov>  
**Sent:** Monday, December 15, 2025 12:46 PM  
**To:** Cody S. Harris; Steven Ragland  
**Cc:** Carlos C. Martinez; Margot Mendelson; Tess Borden; Kyle Virgien; Laura Lind; Lisa C. Lu  
**Subject:** RE: Ruiz, et al. v. ICE, et al., No. 25-cv-9757-MMC

[EXTERNAL]

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Thank you Cody. Confirming receipt, and that I've been following up internally on your requests for Mr. Roque Campos and Mr. Viera Reyes. I'll keep you updated as soon as I receive further information.

Thanks, and talk to you soon.

Savith

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**From:** Cody S. Harris <CHarris@keker.com>  
**Sent:** Monday, December 15, 2025 10:55 AM  
**To:** Iyengar, Savith (USACAN) <Savith.Iyengar@usdoj.gov>; Steven Ragland <SRagland@keker.com>  
**Cc:** Carlos C. Martinez <CMartinez@keker.com>; Margot Mendelson <mmendelson@prisonlaw.com>; Tess Borden <tess@prisonlaw.com>; Kyle Virgien <kvirgien@aclu.org>; Laura Lind <LLind@keker.com>; Lisa C. Lu <LLu@keker.com>  
**Subject:** [EXTERNAL] Ruiz, et al. v. ICE, et al., No. 25-cv-9757-MMC

Savith,

As we explained on the phone to Civil Chief Pamela Johann, and as is recounted in detail in our moving papers, there are several individuals detained in California City who are experiencing acute medical distress and need immediate specialized medical attention. Two of those individuals are named plaintiffs Yuri Alexander Roque Campos (A-No. 240174337) and Fernando Viera Reyes (A-No. 074334561). As set forth in our PI Motion and the accompanying expert declaration filed by Dr. Todd Wilcox, Mr. Roque Campos is at "significant risk of sudden cardiac death." Wilcox Decl. ¶ 89. He must see a cardiologist immediately. Mr. Viera Reyes has been exhibiting symptoms of prostate cancer and "needs aggressive treatment quickly to minimize his risk of having widespread disease and a much higher mortality rate." *Id.* ¶ 116. Both men's medical conditions have only deteriorated since we filed our PI motion and neither man has seen a specialist and begun an appropriate course of treatment.

We plan to move for a TRO this week, asking the Court to order Defendants to immediately ensure that Mr. Roque Campos sees a cardiologist and Mr. Viera Reyes sees a urologist, and that both men receive appropriate medical treatment and follow-up. These are severe, life-threatening diseases. If you can persuade your clients to immediately provide the relief we are about to seek from the Court, please let us know. Otherwise, consider this a courtesy notification that we will be filing a TRO as soon as possible this week.

Regards,

Cody

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**Cody S. Harris**

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