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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

DEFENSE FOR CHILDREN
INTERNATIONAL – PALESTINE; AL-
HAQ; AHMED ABU ARTEMA;
MOHAMMED AHMED ABU ROKBEH;
MOHAMMAD HERZALLAH; A.N.;
LAILA ELHADDAD; WAEIL ELBHASSI;
BASIM ELKARRA; and DR. OMAR EL-
NAJJAR

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., *President of the
United States*, ANTONY J. BLINKEN,
Secretary of State, LLOYD JAMES
AUSTIN III, *Secretary of Defense*, in their
official capacities,

Defendants.

Case No.: 23-cv-05829

**DECLARATION OF MOHAMMED ABU
ROKBEH IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION**

Hearing: January 11, 2024 at 1:00 p.m.

DECLARATION OF MOHAMMED ABU ROKBEH

I, Mohammed Abu Rokbeh, declare as follows:

1. My name is Mohammed Abu Rokbeh, I am 43 years old. I am a resident of Gaza City. I was born in Jabalia.

2. I work as a field researcher at Defense for Children International – Palestine (DCIP). I am married and a father to 4 children: Ahmed, 14 years old, Kareem, 13 years old, Karam, 10 years old, and Amina, 2 years old. I live in my parents’ building, which consists of five floors, in the northern Gaza Strip. Our apartment is on the fourth floor, and my siblings, with their children, live in the rest of the building, which houses a total of 27 people, mostly children and women.

My family’s displacement as a result of Israel’s attack

3. On October 11, my family and I were forced to evacuate four times in a single day, a complex and arduous situation. Israeli warplanes bombed our neighbors’ three-story house early on October 11, 2023, collapsing the residential building killing everyone inside. Our home was partially damaged in the October 11, 2023 Israeli attack, with windows and doors destroyed due to the strength of the bombing. Around 6 a.m. on October 11, as Israeli airstrikes were intensifying, I decided to take my family to my father-in-law’s house in Jabalia’s Abu Qamar neighborhood.

4. When I got there, I learned that the mosque next door was likely to be bombed, so we left again and headed to my brother Sayed’s house nearby and found it full of my siblings’ families. We decided to stay at my brother’s home, despite being overcrowded with other relatives who fled their homes. Immediately thereafter, I heard screams erupt from across the street as Israeli forces had notified the neighbors that their home would be bombed. We were terrified and felt helpless. I did not know where to go with my family - my children, my siblings and their children.

5. We made our way to a nearby UNRWA school on foot. It served as a shelter for internally displaced people. There was no space for us. A neighbor of the school, upon seeing our

1 situation, took the women and children inside their house, while I, my elderly father and siblings
2 waited in the courtyard of the UNRWA school. After sitting for about two hours feeling lost and not
3 knowing what to do, facing death regardless of whether I risked returning home or remaining in the
4 streets, I decided to take my wife and children to my sister's house in Gaza City. We got there after 5
5 p.m. My brother Sayed and other family members returned to their home in our building, despite the
6 threat.
7

8 6. My children had not eaten at all on October 11, 2023, so upon arrival at my sister's
9 home, I began preparing food for them. I was really worried about my brother Sayed, and every time
10 I heard explosions throughout the night, I would call my siblings and confirm whether they were still
11 alive.
12

13 7. I eventually returned to our home in the north on October 13, just as Israeli warplanes
14 dropped evacuation order leaflets ordering the evacuation of northern Gaza. Israeli authorities ordered
15 over 1.1 million Palestinian residents of northern Gaza to flee to the southern part of the Gaza Strip.
16 On October 17, I took the difficult decision to flee with my wife and children to the southern part of
17 Gaza.
18

19 8. My brother, Sayed, and his family joined us in southern Gaza after several days
20 sheltering in the overcrowded UNRWA-run school.
21

22 9. On October 23, 2023, around 9 a.m, I was eating breakfast with my wife and children
23 in the place we are sheltering in when an Israeli warplane suddenly bombed a nearby residential
24 building just 50 feet away causing significant damage to the building we are staying in. The glass
25 shattered all over our heads. We were all trembling, and although I was terrified, I tried to pretend that
26 I was strong for my children.
27
28

1 **Impact of Israel’s Attacks on Food, Water, and Electricity in Gaza**

2 10. Grocery stores are nearly empty, and many food varieties have become scarce. I tried
3 to find a bag of flour to secure bread for a short period, but I could not find any. I learned from the
4 seller that the price has surged to 3-4 times its normal value, and it is usually unavailable.
5

6 11. The queue at bakeries takes 5-6 hours, starting at 6 a.m., and requires intense
7 competition. Standing in the line itself is unsafe, with the constant fear of airstrikes, as Israel targeted
8 about 15 bakeries across Gaza, exacerbating the citizens’ crisis. People also fight to get the limited
9 bread supplies.

10 12. The gas cylinder is among the challenges we face, as it is running out, and we do not
11 know how long this war will continue. We now buy wood and firewood to cook food and make tea
12 and coffee on an open fire, as if we have regressed a hundred years. Even lighting the fire could be
13 dangerous as it could be seen by Israeli warplanes, but we have no other option.
14

15 13. Walking the streets is very dangerous because we do not know which house Israeli
16 warplanes might target next without warning.

17 14. I do not know if my home is still standing.

18 **Israeli strike kills my relatives**

19 15. On November 8, an Israeli airstrike killed my aunt, three of my cousins and at least 4
20 of their children in Jabalia.
21

22 16. My access to the internet, phone lines and electricity is unpredictable, and my ability
23 to communicate with my loved ones, colleagues, and the outside world is severely limited.

24 17. I have authorized my attorney to sign on my behalf, since signing this document is
25 virtually impossible given that I have weak internet connectivity and no electricity. If required to do
26 so, I will provide a signature when I am able to do so.
27
28

1 I declare under penalty of perjury that the foregoing information is true and correct to the best of my
2 knowledge.

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5 Maria C LaHood
6 Maria LaHood signing on behalf of Mohammed Abu Rokbeh

Date: November 13, 2023

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