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Attorneys for Plaintiffs DEFENSE FOR CHILDREN INTERNATIONAL – PALESTINE, et al.

**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 A.N. IN SUPPORT
OF PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION**

Hearing: January 26, 2024 at 9:00 am

Honorable Jeffrey S. White
United States District Judge

1
2 I, A.N., under penalty of perjury, declare as follows:

- 3 1. I am one of the Plaintiffs in *Defense for Children International-Palestine v. Biden*.
- 4 2. Since the filing of the complaint on November 16, things have only gotten worse. Food,
5 clean water, and medicine is even harder to come by. I am very worried about starvation and
6 disease spreading.
- 7 3. Just this morning, my oldest sister lives in Nusairat refugee camp. The Israeli military just
8 dropped leaflets on her area instructing them to leave. We are all in a panic. She has 8
9 children, she is looking for a way to be evacuated but there is nobody who can help her.
- 10 4. My other sister had to walk a really long distance from the area of her home under active
11 shelling from the air, land, and sea to shelter at my family's house and protect her five young
12 children from death and starvation.
- 13 5. My brother had to walk barefoot for more than 3 miles on Al-Rashid Street (along the sea) to
14 look for scraps of food for our family. The family house hosts more than 150 near and distant
15 relatives. Everyone I speak with from our neighborhood tells me that the intention and action
16 is to destroy not our buildings but delete us from the civil registry.
- 17 6. For the last 70 days, my mother has had to rely on boiled seawater to survive; my dad has to
18 rely on whatever my siblings and our neighbors can find to help him survive the ongoing
19 shelling, the lack of electricity, and the lack of proper medication and sanitation.
- 20 7. My whole family has to wait at least a month to shower, which is a recipe for more disease to
21 spread in my family and the entire neighborhood.
- 22 8. The area my family lives in has come under severe shelling.
- 23 9. On December 18, 2023, while watching Al-Jazeera news, I saw images of my friend and
24 neighbors from Deir al Balah refugee camp, where I grew up and where my family home is,
25 carrying a dead body that I couldn't recognize because it had been maimed beyond
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1 recognition. I was thrown into a panic. I tried desperately to reach out to him but to no avail.
2 My neighborhood was being intensively bombarded all day.

3
4 10. The scenes I saw were 400 feet away from my family home. I spent the next 19 hours trying
5 to find ways to connect to them, but nobody was able to tell me anything. I cannot describe
6 the anguish of not knowing if my family was alive or dead. It wasn't until the next day that I
7 heard from my niece that they were alive.

8 11. I heard more than 10 people were killed in that strike.

9
10 12. On December 7th, 2023, my sister-in-law lost her aunt, her cousin, and 10 of her cousin's
11 children in the blink of an eye. The Israeli military had shelled an entire family without a
12 warning or notice, totally obliterated residential complexes, and deliberately targeted the
13 vicinity of the Shuhada Al-Aqsa hospital, which is the central area's hospital, terrifying and
14 terrorizing the many evacuees sheltering around it.

15 13. The death count is unfathomable to me. To be no longer in the dozens, nor the hundreds,
16 even the thousands, and now the tens of thousands is something that I don't have the capacity
17 to process. I really can't even count the dead, people under the rubble, or picture children
18 dying from starvation.

19
20 14. Besides my wife and children, my entire family lives in the Gaza Strip. My mother, who is
21 struggling with kidney stones and hypertension, has been banned from traveling for medical
22 treatment to the West Bank or any Israeli hospital to seek medical treatment. My father, who
23 has heart complications and chronic obstructive pulmonary disease (COPD), has been denied
24 the ability to travel for medical treatment since Israel imposed a crippling siege on Gaza in
25 2006. I have done what I can from the United States to support my family back home in
26 Gaza, and I have missed them terribly.

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1 15. I feel like I am just waiting in line for my turn to receive the phone call about the fate of my
2 loved ones. Sometimes I think it would be easier to be in Gaza now rather than to be thirsty
3 for news if they are alive or dead.

4 16. I also receive news from other people that I know, in my community, or people that I work
5 with, who have died. A doctor that I know well lost his daughter and granddaughter.

6 17. I personally lived through a 22-day military offensive in 2008-2009 before I left Gaza to
7 come to the United States. My wife and children experienced the 2008-2009, 2012, and 2014
8 Israeli offensives. I know what it is like to live under constant bombardment, and I have been
9 reliving those days every day for the past 70 days.

10 18. In the U.S., I am experiencing an immense and unfathomable fear and uncertainty for my loved
11 ones, checking our social media feeds every 30 seconds, in a frenzied way, to witness new
12 deaths, amputees, journalists, doctors, nurses, and every living and unliving being. I feel like I
13 am experiencing an emotional genocide in my life as I witness and bear witness to the most
14 highly broadcast genocide in history.

15 19. I scroll through pictures of child after child that look just like mine. It is all surreal, and
16 numbing. I don't have the words to express it. Depressed and anxious don't even begin to
17 capture my state of mind. This moment is indescribable. I don't sleep at night.

18 20. It aches my heart that America, where I studied in its universities in conflict resolution,
19 peacebuilding, and transformative social change, is throwing all its capabilities towards so
20 vehemently supporting the mass killing and starvation of the entire population of the smallest
21 tiny, densely populated enclave of land.

22 21. The dehumanization, demonization, of my people that I experience sitting here in the United
23 States is mind-boggling to me. I am not exaggerating when I say that we as a people are being
24 subjected to a form of psychological torture.

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22. When I came to the U.S., I knew it was a haven for critical thinking and a place that valued human rights and dignity. What should I tell my now American children about the country we live in, and how everything around them is telling them their lives don't matter?

23. The U.S. government is signaling to us that our lives are less important than Israelis' lives. I feel like I am perpetually at the bottom of a hierarchy. I watch on the news pundits saying that we should be killed in the thousands, as if we are subhuman, and nobody blinks.

24. I worry about how I have internalized this status of being less-than, and begin to believe that our lives don't matter because that is what the world is telling us, that is what the U.S. Government is telling us.

25. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed this 22nd day of December, 2023.

A. N.

A.N.