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Marc Van Der Hout, Cal. Bar No. 80778  
Johnny Sinodis, Cal. Bar No. 290402  
Van Der Hout LLP  
360 Post Street, Suite 800  
San Francisco CA 94108  
(415) 981-3000  
[REDACTED]

Sadaf M. Doost, Cal. Bar No. 346104  
Baher A. Azmy, admitted *pro hac vice*  
Katherine Gallagher, admitted *pro hac vice*  
Maria C. LaHood, admitted *pro hac vice*  
Astha Sharma Pokharel, admitted *pro hac vice*  
Samah Sisay, admitted *pro hac vice*  
Pamela C. Spees, admitted *pro hac vice*  
Center for Constitutional Rights  
666 Broadway, 7<sup>th</sup> Floor  
New York, NY 10012  
(212) 614-6464

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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 WAEIL ELBHASSI  
IN SUPPORT OF PLAINTIFFS’  
MOTION FOR PRELIMINARY  
INJUNCTION**

Hearing: January 26, 2024 at 9:00 am

Honorable Jeffrey S. White  
United States District Judge

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2 I, Waeil Elbhassi, declare as follows:

3 1. I am one of the Plaintiffs in *Defense for Children International-Palestine v. Biden*.

4 2. Since the end of the “temporary ceasefire,” Khan Younis, where my extended family live,  
5 has been especially targeted since the resumption of the bombing (after the pause).

6 3. Around Dec 9th, my two cousins Shadi and Ahmad (children of my aunt) in Khan Younis  
7 sustained light injuries in a bombing that directly hit a neighbor’s house (2 houses away). Two  
8 members of the neighbors’ family were killed, a young man and woman. Shadi was hit near the  
9 chest with shrapnel that luckily didn’t penetrate his flesh and Ahmad sustained light burns. Both  
10 Shadi and Ahmad were standing outside their house at the time.

11 4. That same night, my aunt (mother of Shadi) told us that what they believed to be white  
12 phosphorus bombs were dropped near their home. They suffered respiratory after-effects for the next  
13 couple of days. Their next door neighbors had to be hospitalized due to difficulty breathing.

14 5. A week later, three members of another neighboring family were killed with a drone while on  
15 their roof in another strike.

16 6. My aunt’s house has been sheltering 64 people, half of which are close friends (and their  
17 families) who had fled Gaza City early in this war. This includes Shadi, his wife and 5 children,  
18 other sons, daughters, grandchildren, in-laws and extended family. Some of those who had initially  
19 come to shelter with them have since moved to Rafah, which is considered safer than Khan Younis,  
20 even though Israel has killed many civilians there, too.

21 7. My aunt and her husband have an option to go to Dubai since they both have a residency  
22 there through their son. But they won’t leave and leave behind many family members, children,  
23 grandchildren and other relatives. This is an especially difficult dilemma for many Gazans who may  
24 be able to leave but can’t leave loved ones behind. They are talking to friends in Rafah to try to rent  
25 a temporary residence there.  
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1 8. I'm very worried for them as they are elderly.

2 9. I'm constantly in touch with my cousin Mazouza in Deir El Balah, who lost her son  
3 Samer. Mazouza has still not been able to recover her son's body, which is still buried under the  
4 rubble, like thousands of other families.

5 10. Mazouza describes scenes of refugees overflowing in the shelters, which are the schools in  
6 Khan Younis. They have little food. Her family used money that was raised by her son in the US and  
7 fed people. She shared photos.

8 10. My family reports that things are getting worse for everyone. They grow more worried as  
9 statistically, the more this continues the higher the chances are that they will be bombed.

10 11. My whole family is very worried. My family and I watch the news all day.

11 12. It is evident that the Israeli assault on Gaza has been intensifying given the increase of the  
12 daily death rate. With this in mind, we fear the worst everytime Deir El Balah, or Khan Younis  
13 (where most of my family are) are mentioned in the news. We feel that bad news about our loved  
14 ones is imminent.

15 13. For me, as a U.S. citizen and resident, like all Palestinian Americans, especially from, or with  
16 family in Gaza, the total lack of action by the US government to stop this genocide has been  
17 infuriating, to say the least. While Israel continues to carry out its assault on Gaza with increasing  
18 impunity against rising global popular and formal opposition, watching the US continue to arm and  
19 fund Israel, sending them the very weapons that might any moment kill my family, and use its Veto  
20 power to block a ceasefire, has been enraging. I feel that me and my community are unseen and  
21 unrepresented, that our lives simply don't matter very much.

22 14. In general, I feel a sense of helplessness, frustration, and rage, that such crimes against  
23 humanity are taking place with either no action, or complicity by the United States government.  
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1 15. It has been painful and traumatizing to watch the mass killing, destruction, and what's  
2 clearly an operation of uprooting of our people in Gaza and Palestine in general.

3 16. I'm the son of parents who both lived through the Nakba (catastrophe), the uprooting of the  
4 Palestinian people from their land, and the destruction of their country in 1948. We as a people carry  
5 the generational trauma of that event. While this current war and the immediate loss it is causing are  
6 traumatizing on their own, watching another uprooting/Nakba of our people in real time is  
7 horrifying. I have not been able to help but be consumed by this additional pain and worry on a daily  
8 basis. It has been difficult to focus on work and daily tasks in general and it has been difficult to  
9 sleep, eat, or enjoy usual social activities, hobbies, etc. The past two months feel like a huge  
10 disruption of life for me and my community, a sense of collective depression and anxiety.

11 17. These are not feelings that I have been able to share at work or in spaces in general other than  
12 with my family and friends. The U.S. government's unconditional support for the killing of my  
13 people, and the biased corporate media coverage of this war that normalizes and justifies our killing,  
14 makes it feel that sharing my experience as a Palestinian is a taboo topic.  
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19 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
20 is true and correct.

21 Executed this 22nd day of December, 2023.

22 *waeil elbhassi*  
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Waeil Elbhassi  
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