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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 LAILA ELHADDAD
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, Laila Elhaddad, under penalty of perjury, declare as follows:

- 3
- 4 1. I am a Plaintiff in *Defense for Children International-Palestine v. Biden*.
 - 5 2. Since I filed the complaint, things have gotten far worse for my relatives.
 - 6
 - 7 3. Those who said they wouldn't leave Gaza City have since been forced to leave: My paternal
8 uncle and his two sons, my cousins, have had to move to Rafah. They have now been
9 internally displaced for the fourth time.
 - 10
 - 11 4. Their home has been partially damaged in an Israeli tank and was no longer livable. They
12 have moved from place to place, the last place in Gaza City that they left was bombed shortly
13 thereafter.
 - 14
 - 15 5. I have two cousins still in Gaza City, Rana and Hiba, and they are now completely cut off.
16 Their apartment buildings are surrounded by tanks, Hiba has not been able to leave her
17 building for a long time, as she lives close to the Nasser hospital that has been heavily
18 targeted. Hiba hasn't been able to go out and find food or find clean water for her family.
 - 19
 - 20 6. I and my relatives outside of Gaza have lost communication with her. We are only able to
21 find out that she is still alive through other local contacts who are able to check in on her and
22 get the word out to us.
 - 23
 - 24 7. The relatives in Gaza that I can still reach often don't want to speak to me anymore as they
25 are completely overwhelmed. One cousin has twins that are a mere few weeks old. It is
26 impossible to find any food or clean water, they're having to walk very long distances to get
27 these basics. Most of what they cook is without any protein. They can't get medicines for my
28 uncle, who has a heart condition.

- 1 8. Some of my family on my mother's side received the order to evacuate their area at the
2 entrance of Khan Younis, so they went to Mawasi, which is the small area by the beach that
3 the Israeli military has designated as a safe zone, but it has no infrastructure, no capacity to
4 hold everyone. As far as we know they are alive, but they are there under very difficult
5 conditions and had to leave their homes in the middle of Khan Younis.
6
- 7 9. They are just barely surviving: the most people can hope for is clean water and some food.
8 Medications have become a luxury that they don't even look for. All of their children are
9 traumatized.
10
- 11 10. As for myself, it has been a very difficult time emotionally.
12
- 13 11. I have recurring nightmares every night; in them, I go back to Gaza and everything is
14 completely destroyed. And I keep searching through the rubble trying to find pictures.
15
- 16 12. Being here in the US at this moment in time as a Palestinian-American, I feel like I'm living
17 in the twilight zone.
18
- 19 13. I have been doing a lot of public speaking, and I have done everything in my power, trying to
20 be calm, to explain over and over again why we don't deserve to be killed. Why our homes
21 and everything that we hold dear, our places of worship, our parks, our very life in general,
22 shouldn't be destroyed. This has been so exhausting, to have to explain, over and over again.
23
- 24 14. The silence is deafening. I really feel completely invisible.
25
- 26 15. Some days I wake up and say we have to keep trying and working, and other days I feel like
27 I'm banging my head against the wall.
28

1 16. I feel powerless, that there's nothing I can do to stop this right now, and I feel like I'm
2 contributing to the destruction of Gaza, to the destruction of life and everything beautiful. Of
3 my own family.
4

5 17. They are not just destroying property and killing people. They're destroying people -
6 peoples' lives, livelihoods, memories - Gaza is being rendered unlivable. I just don't see a
7 future, I don't see a way forward.
8

9 18. Earlier on during the course of this genocide I had some hope, I kept saying that someone at
10 some point will do something to stop this, and now I only see apocalyptic scenarios, I only
11 see death and destruction.
12

13 19. I feel like we are completely erased. The U.S. is not even trying to pretend that it cares about
14 Palestinians. What I am seeing is beyond complicity, our officials are being Israeli
15 spokespeople. That's how I feel when I watch Blinken speak.
16

17 20. As a Palestinian-American, my life, my peoples' life, matters less, and worse, doesn't matter
18 at all to my government. I feel they are actively not only helping Israel, but ... targeting me
19 and my people. It's a huge slap in the face.
20

21 21. It is hard to articulate this but genuinely, I wake up feeling that the United States is OK with
22 our genocide. That killing us is an acceptable cost, that the United States is ok with
23 decimating my people, along with their place, their homes, their livelihoods, everything in
24 between, in the name of Israeli security. That our lives are dispensable and disposable. They
25 just don't care about us.
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22. That’s the everyday reality right now that I’m coming to terms with. The United States Government does not care about me as a Palestinian, it does not care about my people or my family. At all.

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.



Laila Elhaddad