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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

**SECOND DECLARATION OF DR  
SUSAN POWER, FOR AL-HAQ 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 I, Susan Power, under penalty of perjury declare as follows:

2 1. My name is Susan Power and I am the Head of Legal Research and Advocacy at Al-  
3 Haq. I have worked at Al-Haq for 10 years. This declaration is an update of the statements I submitted  
4 to this Court on November 16, 2023.

5 2. Al-Haq is an independent Palestinian non-governmental human rights organization  
6 based in Ramallah, West Bank. The United States' support of Israel's current attack on Gaza continues  
7 to disrupt Al-Haq's operation.

8 3. Due to Israel's continued bombing of the Gaza Strip, our field researchers continue to  
9 work on preliminary reports of the unfolding hostilities on the ground, but are not able to get the  
10 required onsite documentation.

11 4. The two directors of our partner organizations in Gaza, Al Mezan Center for Human  
12 Rights and the Palestinian Center for Human Rights (PCHR), are now operating out of Cairo,  
13 Egypt.

14 5. Members and staff of Al-Haq in Gaza have been subjected to increased indiscriminate  
15 bombardment and displacement.

16 6. Our legal researcher and advocacy officer Ahmed Abofoul, lost more than 60  
17 members of his extended family since October 7, who were indiscriminately bombed and killed  
18 in airstrikes. On 18 October five of his cousins were killed, Dr. Raafat Abofoul and his wife, his  
19 brother and his wife, and his son whose wife is in critical condition as she lost her limbs. On 23  
20 October, his cousin's four-year-old child was injured in an airstrike and died the following day, in  
21 another airstrike. On 23 November, three of his cousins, Rami Abofoul, his wife and daughter (a  
22 child), were killed in in the Abu Iskandar area, Sheykh Ridwan neighbourhood, Gaza City.  
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1 Another daughter was in a critical condition after she lost her leg. A further 13 members of his  
2 family's in-laws (the Abu Obeid family) were killed in another bomb strike.

3           7.       On 24 November, Ahmed's eldest uncle Fathi Abofoul was killed in the Sheykh  
4 Ridwan neighborhood, Gaza City. Fathi was in his house when shrapnel from a nearby bombing  
5 entered and hit him minutes before the truce started for the "humanitarian pause". On 13 December at  
6 least 50 members of Ahmed's extended family sheltering in a multi-story house in Beit Lahia, were  
7 killed, although the exact number remains unknown because some remain under the rubble. The  
8 targeted house was that of the Mokhtar, Abdallah Abofoul (elder of the family). Several families were  
9 sheltering in his multi-story family home in the Beit Lahia area, north of Gaza, close to Kamal Adwan  
10 Hospital.

11           8.       Al-Haq continues to struggle to maintain contact with its two field researchers based in  
12 the Gaza Strip, due to the latest communication blackout we had not established communication in the  
13 five days prior to 21 December. In the south in Rafah, the sister of our field researcher Tareq Zaqqoot,  
14 lost her three children who were killed in a bombing attack on their home, leaving her in a critical  
15 condition, requiring three days of surgeries. Tareq and his family have since been displaced from his  
16 home in the south of Gaza, after neighbors received a phone call from the Israeli forces to evacuate.  
17 He moved to his mother in law's house in Khan Younis and is currently in Nusairat. His father, who  
18 is a cancer patient was not able to leave and remained with his brother. On 22 December the Israeli  
19 army issued a map highlighting blocks for bombardment, including a block dangerously close to where  
20 Tareq is currently located. He is now preparing to leave with his family to Rafah.

21           9.       In Gaza city, the home of our field researcher, Mohammad Abu Rahmeh was bombed  
22 and the building housing a number of apartments was completely destroyed. He and his family fled to  
23 his wife's sisters house, which was subsequently bombed. In October our organization lost contact  
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1 with Mohammad for over two weeks. When we regained contact, he and his family had fled to the  
2 south, to Rahaf. Due to a communications blackout, it is difficult to retain regular contact.

3 10. Because of the continuous bombardments it is impossible for our field researchers to  
4 conduct field investigations. At the moment, the organizations are collecting preliminary data, for  
5 follow up when hostilities subside. It is the first time in the 44-year history of Al-Haq, that we have  
6 been unable to conduct field investigations due to the intensity and scale of the hostilities.  
7

8 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge  
9 and belief.

10  
11 

12 \_\_\_\_\_  
13 Susan Power

Executed this 22nd day of December, 2023