

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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, 7th Floor
New York, NY 10012
(212) 614-6464
[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 AHMED ABU
ARTEMA IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION**

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

DECLARATION OF AHMED ABU ARTEMA

I, Ahmed Abu Artema, declare as follows:

1. My name is Ahmed Abu Artema. I was born in Rafah in 1984 and a resident of southern Gaza.

My family background

2. I am an independent journalist, writer, and poet. I am also a peace activist, and I was one of the main organizers of the Great March of Return, a series of weekly nonviolent protests of Palestinians in the Gaza Strip from March 2018 to December 2019. I have frequently traveled internationally and spoken out publicly to demand the lifting of the blockade on Gaza, and the Palestinian Right of Return.

3. I have four children: Abdallah, 12, Mohammad, 11, Batool, 8, and Abdulrahman, 9.

4. My family members are refugees living in the Gaza Strip. We were originally from the village of al Ramla, southeast of Yafa (Jaffa), but my grandfather and my relatives were displaced by Israeli forces in 1948. The village of al Ramla, depopulated of the vast majority of the native Palestinian population, is now an Israeli city in the larger Tel Aviv metropolitan area.

Israel's attack on my family.

5. Since the war started in Gaza, we were living under constant bombardment. The ringing in my ears continued even during the brief lulls when the bombs stopped dropping. We couldn't sleep at night.

6. On October 23, 2023, I went to my father's house to spend the night with the kids. We had come to offer my aunt Fatema, who was 85 years old, our condolences. She lost three grandchildren during a bombing approximately ten days earlier that also injured her son, and on October 23, her other son and grandchild were killed by another Israeli airstrike. The family was trying to not tell her what happened because she was so old and frail, but unfortunately she found out.

1 7. On the morning of October 24, I was sitting in the living room of my father’s home
2 with three of my four children and other relatives, when an Israeli airstrike hit the three-story building.
3 I lost consciousness from the impact, but when I opened my eyes I initially saw only dust and rubble.
4 I could not hear anything. I soon realized that the house was destroyed, and that my family and I were
5 under the rubble.
6

7 8. My two aunts Fatema, and Khayriya, 65, were immediately killed by the airstrike. My
8 stepmother Intisar, who was in her mid-50s, and my cousin Fawziyah, in her 40s, were also killed.

9 9. My eldest son, Abdallah, and my niece Joud, 10, were severely injured by the airstrike.

10 10. After a day in intensive care, Abdallah died as a result of his injuries. Joud died the
11 following day.
12

13 11. The neighbor Mohammed was also killed in the same airstrike.

14 12. My son Mohammad, my daughter Batool, and I suffered multiple injuries from the
15 airstrike, including second-degree burns.

16 13. My 9-year old son was spared because he wasn’t home: he had been standing in the
17 long line at the bakery to get bread and had been there for five hours when the blast hit my father’s
18 home.
19

20 14. My three sisters were also injured by the airstrike.

21 15. I initially received first aid at a nearby clinic for my injuries before being transferred
22 first to Rafah hospital and then another hospital in the southern Gaza Strip. One of my sons, my
23 daughter, and I are still being treated for our injuries.

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

25 16. After Yoav Gallant announced he was going to cut off all our electricity, our life
26 changed suddenly. At first, we were relying on generators, but even those ran out of fuel and we can’t
27 find fuel. So now the only thing available are solar panels. Some hospitals have solar panels, and many
28

1 people go to the few locations where there are panels to charge their phones. But now Israel has started
2 targeting places that have solar panels.

3 17. Before I was injured, I would spend the day searching for someone with a solar panel
4 just so we could charge our phones. Lights for our homes at night are out of the question, that's not
5 even a thing Gazans expect anymore. We can't use our fridge or any appliances since this all started.
6 But we try to find a source of power just so that at least we can charge our phones, and keep some
7 communication with the outside world.
8

9 18. The last words exchanged between me and Abdallah right before he was killed, I was
10 asking him to go to the school near where we were staying, where I was charging my phone as they
11 had a solar panel to bring my phone back. He was just getting up and told me "baba (dad), I'm going
12 to go and get the phone now," and that's when the strike hit.
13

14 19. There are long lines for bread. We look for alternative: biscuits, rice, although rice is
15 barely available. And rice needs fuel to cook, so people are searching for firewood.

16 20. Food is hard to come by. Many don't even have one meal a day. And now, hospitals
17 are starting to run out of electricity.

18 21. The hospital that I am in with my children, my family can't even come see us because
19 there are no cars. Some of the most simple things we need, medicines, are impossible to come by.
20

21 22. My father's house was completely destroyed. All my surviving relatives who lived in
22 that house, which was three stories, now rent a small flat. None of them, and none of us, are safe.

23 23. I believe that Israel is intentionally targeting entire families, as is evidenced by how
24 many families have been eliminated. This is an eliminatory war against the Palestinian people.

25 24. I understand that the United States continues to supply weapons to the Israeli military
26 like the one that hit my father's house and killed my son and relatives, and left all of us injured and
27 traumatized.
28

