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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 DR. OMAR AL-
NAJJAR IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY
INJUNCTION**

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

1 **DECLARATION OF DR. OMAR AL-NAJJAR**

2 I, Dr. Omar Al-Najjar, declare as follows:

3 **My Family Background**

4 1. My name is Dr. Omar Al-Najjar and I am 24 years old. I am Palestinian and was born
5 and raised in Khuza'a, which is a border village east of Khan Yunis City in Gaza.

6 2. I have been an intern physician at the Nasser Medical Complex in Khan Yunis City
7 since August 2023.

8 3. My family members are refugees in Gaza. They were originally from the village of
9 Salamah in the city of Yafa, but they were displaced by Zionist forces in 1948, and the village was
10 destroyed. Today, what used to be Salamah is in a part of Tel Aviv.

11 4. Almost all of my immediate and extended family members live in Gaza. We have
12 witnessed and lived through Israel's blockade of Gaza and its repeated military attacks on Gaza.

13 5. On October 7, when Israel's attacks on Gaza began, I was living with four of my
14 immediate family members, my mother, father, one of my three sisters and my brother, in Khuza'a.

15 6. Khuza'a is a village in the eastern part of Khan Yunis in the southern part of the Gaza
16 strip, far south of the evacuation zone boundary announced by Israel.

17 **My Experience at the Nasser Medical Complex Since Israel's Attacks Began**

18 7. Since October 9, after Israel's attacks began, I have been living at the Nasser Medical
19 Complex. I am here 24 hours a day, except sometimes when I leave the Medical Complex to visit my
20 family.

21 8. I hear constant bombings near the Medical Complex. I know that Israel has attacked
22 other hospitals in Gaza in the past month, and I am afraid that they could attack the Nasser Medical
23 Complex too. I also fear for my life when I am outside of the Medical Complex because Israel's
24 bombardments are constant.
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1 9. Tens of thousands of displaced people are sheltering at Nasser Medical Complex.

2 10. We receive hundreds of injured people daily. Often we receive dozens of injured people
3 at once because they were all injured by the same Israeli airstrike. Most of them are women and
4 children.

5 11. I have treated children who are sole survivors of their families.

6 12. I have treated injuries that include burns, fractures, dismemberments, gouging eyes,
7 and amputated limbs.
8

9 13. I recall that on October 26^w a fellow medical student, Abdelrahman Abu Shammala,
10 was brought into Nasser Medical Complex. I knew him well, but he was unrecognizable due to his
11 injuries. He got immediate medical care, but doctors were unable to save him. More than 22 people
12 from his family were killed that day.
13

14 14. On another day, I received the deceased body of another medical student, Ibtihal al-
15 Astal, who I worked with and the bodies of her family members. These are tough moments filled with
16 sadness and loss of hope. These were the people meant to treat patients.

17 15. The scenes are numerous and horrific. When I recall them, I feel like I am reopening a
18 door to hell.

19 **Impact of Israel's Attacks on My Family**

20 16. On October 8, I, together with four members of my immediate family (mother, father,
21 brother, sister) left our home in the village of Khuza'a because of artillery shelling, and because of
22 direct threats from the Israeli military that we received by phone and through social media posts.

23 17. After my family members left, the village of Khuza'a was destroyed. My family home
24 there, where I was raised, was partially destroyed by artillery shelling during the early days of Israel's
25 attack. I have not been able to return there since, and I do not know the current extent of the
26 destruction.
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1 18. After my immediate family left Khuza'a, the Israeli army contacted my family via
2 phone and social media with direct threats that it would directly target us should we return.

3 19. Since Israel's assault on Gaza began, specifically on October 10, five of my extended
4 family members were killed by Israeli bombing after evacuating Khuza'a and seeking safety with
5 relatives who lived closer to Khan Yunis.
6

7 20. Since my family's displacement on October 8, my sister and niece are sheltering in an
8 UNRWA school, and the rest of my family including my parents, one sister and my brother, is staying
9 with a relative east of Khan Yunis.

10 **Impact of Israel's Attacks on Food, Water, and Electricity in Gaza**

11 21. The situation with food, water and electricity is dire. Each family, regardless of its size,
12 is only allowed to buy 1 dollar worth of bread, equivalent to half a package of bread. People stand in
13 lines for 5-6 hours to purchase their portion of bread. As of November 8, my family has not been able
14 to buy any bread for 3 days, as the only bakery is functioning just 4 hours a day due to lack of water
15 and fuel. In the hospital, each doctor receives two pieces of bread per day.
16

17 22. There is no drinkable water at the supermarket or here in the hospital. People have to
18 wait in line at the water station to get water. Sometimes my family calls me to bring them water and I
19 have to walk around one kilometer to find any water. There is only one water station in the entire
20 governorate of Khan Yunis.
21

22 23. We have not had electricity since October 11, and the internet connectivity is extremely
23 weak. Municipal services have stopped and garbage is piling up in the streets. Buildings have
24 collapsed.

25 24. I have heard what Israeli officials have said about us Palestinians in Gaza – that we are
26 “animals,” that we are all “terrorists,” that they want to shut off all food, water, and electricity. That
27 they want to destroy us. It is horrifying for me, as a Palestinian, to hear what this occupying
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