

1 EDWARD J. MCINTYRE [SBN 80402]  
emcintyre@swsslaw.com  
2 SOLOMON WARD SEIDENWURM & SMITH, LLP  
401 B Street, Suite 1200  
3 San Diego, California 92101  
Telephone: (619) 231-0303  
4 Facsimile: (619) 231-4755

5 Attorneys for Pacific Law Center and Solomon  
6 Ward Seidenwurm & Smith, LLP

7  
8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10  
11 PACIFIC LAW CENTER, a Professional Law  
12 Corporation; and SOLOMON WARD  
SEIDENWURM & SMITH, LLP,

13 Plaintiffs,

14 v.

15 SHAHROKH SAADAT-NEJAD, an  
16 individual,

17 Defendant.  
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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

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COMPLAINT FOR TRADEMARK  
INFRINGEMENT, CYBERSQUATTING  
AND UNFAIR COMPETITION AND JURY  
DEMAND

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4. Saadat-Nejad has also misappropriated the pacificlawcenter.com and the solomonward.com domain names.

## JURISDICTION

5. This is a civil action for, among others, claims arising under the trademark laws of the United States, 15 U.S.C. §1051, *et seq.* This Court has jurisdiction pursuant to the provisions of 28 U.S.C. §1331, 28 U.S.C. §1338 and 15 U.S.C. §1121.

6. This Court has subject matter jurisdiction over the unfair competition claims pursuant to 28 U.S.C. §1338(b), in that these claims are joined with a substantial and related claim under the trademark laws of the United States.

7. This Court has supplemental jurisdiction over the state-law claims pursuant to the provisions of 28 U.S.C. §1367(a).

## VENUE

8. Venue in this district is proper pursuant to the provisions of 28 U.S.C. §1391(b).

## MATERIAL ALLEGATIONS

9. Pacific Law Center has been duly incorporated and authorized to do business as a professional law corporation in California under the name "Pacific Law Center."

10. Pacific Law Center registered the internet domain names "pacificlawcenter.com," "pacifidawcenter.net," "pacificlawcenter.org" and "pacificlawcenter.ws" and has at all times since maintained ownership of said domain names.

11. Pacific Law Center has been doing business as a law firm, with a practice emphasizing criminal, bankruptcy and personal injury case, in the San Diego.

12. Pacific Law Center has used the exclusive trademark "Pacific Law Center" in its professional business and in an extensive advertising and marketing campaign, including television, telephone business directories, print and various other media.

13. Pacific Law Center has used and advertised the internet domain names, and operated internet sites at the addresses, "pacificlawcenter.com," "pacificlawcenter.net,"

1 "pacificl原因center.org" and "pacificl原因center.ws" to advertise and promote its business  
2 activities as a law firm, with a practice emphasizing criminal, bankruptcy and personal injury  
3 cases.

4 14. Pacific Law Center has built up valuable goodwill in its service mark and trade  
5 name, "Pacific Law Center" and the public generally has come to associate its mark  
6 exclusively with Pacific Law Center's professional business in California.

7 15. Solomon Ward is, and has been for more than 25 years, a law firm in San  
8 Diego known and practicing throughout California and across the country.

9 16. Solomon Ward has used the exclusive trademarks "Solomon Ward  
10 Seidenwurm & Smith" and "Solomon Ward" in the operation of its professional business.  
11 Solomon Ward has used the internet domain names, and operated internet sites at the  
12 address, "swsslaw.com" and "solomonward.com" to make the public aware of its  
13 professional business.

14 17. Solomon Ward has built up valuable goodwill in its service marks and trade  
15 names "Solomon Ward Seidenwurm & Smith" and "Solomon Ward" and the general public  
16 has come to associate those names exclusively with Solomon Ward's professional business  
17 in San Diego, throughout California and across the nation.

18 18. On August 31, 2006, Saadat-Nejad retained Pacific Law Center to defend him  
19 against criminal charges, including, alleged violations of Vehicle Code §123152,  
20 subsections (a) and (b) and Penal Code §§415(1) and 594A(B)(2), then pending against him  
21 in San Diego and for which he was then incarcerated in the San Diego county jail.

22 19. Shortly thereafter, Saadat-Nejad became dissatisfied with Pacific Law Center's  
23 representation, terminated its representation of him and began a course of conduct,  
24 including posting disparaging comments about Pacific Law Center on the internet calculated  
25 to interfere with and damage it and its business operations.

26 20. On September 20, 2006, Saadat-Nejad registered and obtained ownership of  
27 the internet domain name "pacificl原因centers.com," which is confusingly similar to the  
28 internet domain names registered to Pacific Law Center and sites used by it.

1        21.     Since September 20, 2006 Saadat-Nejad has maintained registration of the  
2 internet domain name of, and operated the internet site at, "pacificlawcenters.com" with the  
3 intent of (1) intercepting actual and potential clients of Pacific Law Center and the general  
4 public who use internet search engines "key word" search features which would otherwise  
5 lead them to Pacific Law Center's internet site(s), (2) intercepting consumers who have  
6 added the letter "s" to Pacific Law Center's true internet site name(s) in attempting to find  
7 plaintiffs internet site; and (3) once consumers enter Saadat-Nejad's internet site, exposing  
8 them to its content, which is intended and designed to disparage and harm the goodwill of  
9 Pacific Law Center, attempt to dissuade actual and potential clients from doing business with  
10 Pacific Law Center and to entice them to communicate by email with Saadat-Nejad and to  
11 visit another internet site which is owned and operated by Saadat-Nejad under the internet  
12 domain name "ushostage.com."

13        22.     On January 12, 2007, Pacific Law Center filed an action in superior court  
14 against Saadat-Nejad, case no. GIC 878352.

15        23.     On February 23, 2007, Pacific Law Center retained Solomon Ward to  
16 represent it in that lawsuit.

17        24.     On February 27, 2007, Solomon Ward successfully obtained a temporary  
18 restraining order against Saadat-Nejad that restrains him from:

19                "Until further order of this Court Shahrokh Saadatnejad shall immediately  
20 cease using the website pacificlawcenters.com or any similar website.

21                Until further order of this Court, Shahrokh Saadatnejad shall not use the trade  
22 name Pacific Law Center in any published communication...."

23        25.     On March 9, 2007, the superior court extended that temporary restraining  
24 order until an April 20, 2007.

25        26.     On March 10 or 11, 2007, Saadat-Nejad obtained a confusingly similar  
26 domain name "solomonwardlawfirm.com." Saadat-Nejad has maintained registration of that  
27 internet domain name of, and operated the internet site at solomonwardlawfirm.com with  
28 the intent of (1) intercepting actual and potential clients of Solomon Ward and the general  
public who use internet search engines' "keyword" search features which would otherwise

1 lead them to Solomon Ward's internet sites; (2) intercepting clients who have added  
2 "lawfirm" to Solomon Ward's true internet site name in an attempt to find Solomon Ward;  
3 and (3) once clients enter Saadat-Nejad internet site, exposing them to its conduct which is  
4 intended and designed to disparage and harm the goodwill of Solomon Ward, attempting to  
5 dissuade actual and potential clients from doing business with Solomon Ward and to entice  
6 them to communicate by email with Saadat-Nejad and to visit another internet site which is  
7 owned and operated by Saadat-Nejad under the internet domain name "ushostage.com."

8 **FIRST CLAIM FOR RELIEF**

9 **[Trade Name Infringement & Unfair Competition - Common Law]**

10 27. Pacific Law Center and Solomon Ward hereby incorporate by reference  
11 paragraphs 1 through 26, above.

12 28. Saadat-Nejad's use of the internet domain names and sites  
13 "pacificlawcenters.com" and "solomonwardlawfirm.com" constitutes an unlawful, wrongful,  
14 willful, intentional, fraudulent and malicious interference with the trademarks, service marks  
15 and trade names of Pacific Law Center and Solomon Ward and unfair competition with their  
16 business.

17 29. Saadat-Nejad's wrongful use of the confusingly similar internet domain name  
18 and internet sites "pacificlawcenters.com" and "solomonwardlawfirm.com" has caused, and  
19 unless enjoined by this Court will continue to cause, irreparable injury to Pacific Law Center  
20 and Solomon Ward by misleading, confusing and misdirecting its clients, potential clients  
21 and the general public, intercepting potential "hits" on Pacific Law Center and Solomon  
22 Ward's internet sites and luring them to Saadat-Nejad's internet sites at  
23 "pacificlawcenters.com," "solomonwardlawfirm.com" and "us hostage.com."

24 30. Pacific Law Center and Solomon Ward have no adequate remedy at law for  
25 the injuries and damages they currently suffer, since money damages will be inadequate to  
26 compensate Pacific Law Center and Solomon Ward for their loss of reputation, business,  
27 income and goodwill, and the impossibility of Pacific Law Center and Solomon Ward  
28 determining the amount of damage that they will suffer if Saadat-Nejad's conduct is not

1 restrained.

2 31. As a proximate result of Saadat-Nejad's wrongful conduct, Pacific Law Center  
3 and Solomon Ward's reputation, business, goodwill and income have all been damaged in  
4 an amount not yet fully known to Pacific Law Center and Solomon Ward and to be proven  
5 at trial.

6 32. The actions of Saadat-Nejad's constitute fraud, oppression and/or malice,  
7 entitling Pacific Law Center and Solomon Ward to an award of punitive and exemplary  
8 damages.

9 **SECOND CLAIM FOR RELIEF**

10 **[Trade Name Infringement/Dilution and Unfair Competition]**

11 33. Pacific Law Center and Solomon Ward hereby incorporate by reference  
12 paragraphs 1 through 32, above.

13 34. Saadat-Nejad's registration of the internet domain name and operation of the  
14 internet site "pacificlawcenters.com" and "solomonwardlawfirm.com" for his own purposes  
15 constitutes a statutory infringement and dilution of Pacific Law Center and Solomon Ward's  
16 service marks and trade names and acts of unfair competition, entitling them to statutory  
17 relief and remedies under the provisions of the Lanham Act governing trademark  
18 infringement and dilution and unfair competition protection injunctive relief and money  
19 damages; in an amount in excess of \$75,000 exclusive of interest and costs.

20 **THIRD CLAIM FOR RELIEF**

21 **[Anti-Cybersquatting Consumer Protection Act]**

22 35. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
23 through 34, above.

24 36. Saadat-Nejad's use of the internet domain names and sites  
25 "pacificlawcenters.com" and "solomonwardlawfirm.com" was done with a bad faith intent  
26 to benefit and profit from Pacific Law Center and Solomon Ward's, service marks and trade  
27 names, entitling Pacific Law Center and Solomon Ward to relief under the provisions of the  
28 1999 Anti Cybersquatting Consumer Protection Act, 15 U.S.C. §1125(d), including

1 injunctive relief and money damages; in an amount in excess of \$75,000 exclusive of  
2 interest and costs.

3 **FOURTH CLAIM FOR RELIEF**

4 **[California Unfair Trade Practices Act]**

5 37. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
6 through 36, above.

7 38. Saadat-Nejad's use of the internet domain names and sites  
8 "pacificlawcenters.com" and "solomonwardlawfirm.com" constitutes an unfair trade  
9 practice, entitling Pacific Law Center and Solomon Ward to relief under the provisions of  
10 California Business & Professions Code §§17200, et seq., including, injunctive relief and  
11 money damages; in an amount in excess of \$75,000 exclusive of interest and costs.

12 **FIFTH CLAIM FOR RELIEF**

13 **[Trademark Infringement]**

14 39. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
15 through 38, above.

16 40. By engaging in the conduct set forth above, Saadat-Nejad has infringed Pacific  
17 Law Center and Solomon Ward's service marks and trade names in interstate commerce.

18 41. Saadat-Nejad's use of Pacific Law Center and Solomon Ward's names and  
19 marks is without their permission or authority and is likely to cause confusion and/or mistake  
20 and to deceive.

21 42. Saadat-Nejad's acts of service mark infringement were committed with full  
22 knowledge and disregard for Pacific Law Center and Solomon Ward's rights and with the  
23 intent to cause confusion and mistake and to deceive.

24 43. As a result of Saadat-Nejad's conduct, Pacific Law Center and Solomon Ward  
25 have suffered and will continue to suffer damage to their business, reputation and goodwill  
26 and the loss of clients they would have but for Saadat-Nejad's acts.

27 44. Saadat-Nejad threatens to continue to do the acts complained of and, unless  
28 and until restrained and enjoined, will continue to do so to Pacific Law Center and Solomon



1 Ward's irreparable damage.

2 45. Pacific Law Center and Solomon Ward's remedy is inadequate to compensate  
3 them for the injuries threatened by Saadat-Nejad's conduct, and they are, therefore, entitled  
4 to injunctive relief.

5 **SIXTH CLAIM FOR RELIEF**

6 **[False Designation of Origin]**

7 46. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
8 through 45, above.

9 47. Saadat-Nejad's acts are in violation of 15 U.S.C. §1125(a) in that Saadat-Nejad  
10 has used a false designation of origin, a false or misleading description and representation of  
11 fact which is likely to cause confusion, and to cause mistake, and to deceive with respect to  
12 the affiliation, connection or association of Saadat-Nejad with Pacific Law Center and  
13 Solomon Ward and with respect to the origin, sponsorship, association, and approval of  
14 Saadat-Nejad's conduct by Pacific Law Center and Solomon Ward.

15 48. As a result of Saadat-Nejad's conduct, Pacific Law Center and Solomon Ward  
16 have suffered and will suffer damage to their business, reputation and goodwill and the loss  
17 of clients but for Saadat-Nejad's acts.

18 49. Saadat-Nejad threatens to continue to do the acts complained of, and unless  
19 restrained and enjoined, will continue to do so to Pacific Law Center and Solomon Ward's  
20 irreparable damage. It would be difficult to ascertain the amount of compensation that  
21 could afford Pacific Law Center and Solomon Ward adequate relief for such continuing acts,  
22 and to do so a multiplicity of judicial proceedings would be required. Pacific Law Center  
23 and Solomon Ward's remedy at law is inadequate to compensate them for the injuries  
24 Saadat-Nejad's conduct threatens, and Pacific Law Center and Solomon Ward are, therefore,  
25 entitled to injunctive relief.

26 **SEVENTH CLAIM FOR RELIEF**

27 **[False or Misleading Description or Representation of Fact]**

28 50. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1

1 through 49, above.

2 51. Saadat-Nejad's acts are violate of 15 U.S.C. §1125(a) in that Saadat-Nejad has  
3 used a false designation of origin, a false or misleading description and representation of fact  
4 which is likely to cause confusion, mistake, and to deceive with respect to the affiliation,  
5 connection or association of Saadat-Nejad with Pacific Law Center and Solomon Ward with  
6 respect to the origin, sponsorship, association, and approval of Saadat-Nejad's conduct by  
7 Pacific Law Center and Solomon Ward.

8 52. As a result of Saadat-Nejad's conduct, Pacific Law Center and Solomon Ward  
9 have suffered and will suffer damage to their business, reputation and goodwill and the loss  
10 of clients and Pacific Law Center and Solomon Ward would have enjoyed but for Saadat-  
11 Nejad's acts.

12 53. Saadat-Nejad threatens to continue to do the acts complained of, and unless  
13 restrained and enjoined, will continue to do so to Pacific Law Center and Solomon Ward's  
14 irreparable damage. It would be difficult to ascertain the amount of compensation that  
15 could afford Pacific Law Center and Solomon Ward adequate relief for such continuing acts,  
16 and to do so a multiplicity of judicial proceedings would be required. Pacific Law Center  
17 and Solomon Ward's remedy at law is inadequate to compensate them for the injuries  
18 Saadat-Nejad's conduct threatens, and Pacific Law Center and Solomon Ward's is, therefore,  
19 entitled to injunctive relief.

20 **EIGHTH CLAIM FOR RELIEF**

21 **[Infringement of Common Law Rights]**

22 54. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
23 through 53, above.

24 55. These acts of Saadat-Nejad constitute unfair competition and an infringement  
25 of Pacific Law Center and Solomon Ward's common-law rights in their marks.

26 56. As a result of Saadat-Nejad's acts as alleged, Pacific Law Center and Solomon  
27 Ward's have suffered and will suffer damage to their business, reputation and goodwill and  
28 with the loss of clients Pacific Law Center and Solomon Ward would have made but for

1 Saadat-Nejad's acts.

2 57. Saadat-Nejad threatens to continue to do the acts complained of, and unless  
3 enjoined, will continue to do so to Pacific Law Center and Solomon Ward's irreparable  
4 damage. It would be difficult to ascertain the amount of compensation that could afford  
5 Pacific Law Center and Solomon Ward adequate relief for such continuing acts, and to do so  
6 a multiplicity of judicial proceedings would be required. Pacific Law Center and Solomon  
7 Ward's remedy at law is inadequate to compensate them for the injuries Saadat-Nejad's  
8 conduct threatens, and Pacific Law Center and Solomon Ward are, therefore, entitled to  
9 injunctive relief.

10 **NINTH CLAIM FOR RELIEF**

11 **[False Designation of Origin]**

12 58. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
13 through 57, above.

14 59. Saadat-Nejad has made use of marks that Pacific Law Center and Solomon  
15 Ward own in connection with services in interstate commerce. Saadat-Nejad's conduct  
16 violates the Lanham Act §43(c) in that he has caused dilution of quality of Pacific Law  
17 Center and Solomon Ward's service marks, all to Pacific Law Center and Solomon Ward's  
18 irreparable injury and damage.

19 60. Saadat-Nejad's acts have lessened the capacity of Pacific Law Center and  
20 Solomon Ward's famous marks to identify and distinguish Pacific Law Center and Solomon  
21 Ward's services. Saadat-Nejad's acts have blurred the unique association which had existed  
22 between Pacific Law Center and Solomon Ward's service marks and the services they offer,  
23 market and distribute under those service marks.

24 61. Pacific Law Center and Solomon Ward's service marks are distinct and famous  
25 marks. The Pacific Law Center and Solomon Ward's marks are inherently strong and  
26 distinctive, have long been used in connection with services with which they appears, have  
27 long been the subject of substantial advertising and promotion, have been used and  
28 advertised throughout the United States, are widely recognized by consumers and those in

1 the trade, are in substantially exclusive use—all as alleged above. Saadat-Nejad's acts were  
2 commenced and committed beginning at a time **after** Pacific Law Center and Solomon  
3 Ward's service marks have become famous.

4 62. Pacific Law Center and Solomon Ward are informed and believe that Saadat-  
5 Nejad committed these acts willfully and with the intent to trade on Pacific Law Center and  
6 Solomon Ward's reputation and to cause dilution of Pacific Law Center and Solomon Ward's  
7 famous marks.

8 63. As a result of Saadat-Nejad's acts, Pacific Law Center and Solomon Ward have  
9 suffered and will continue to suffer damage to their business, reputation and goodwill and  
10 the loss of clients that Pacific Law Center and Solomon Ward would have enjoyed but for  
11 Saadat-Nejad's acts. Saadat-Nejad threatens to continue to do the acts complained of, and  
12 unless enjoined, will continue to do so to Pacific Law Center and Solomon Ward's  
13 irreparable damage. It would be difficult to ascertain the amount of compensation that  
14 could afford Pacific Law Center and Solomon Ward adequate relief for such continuing acts,  
15 and to do so a multiplicity of judicial proceedings would be required. Pacific Law Center  
16 and Solomon Ward's remedy at law is inadequate to compensate them for the injuries  
17 Saadat-Nejad's conduct threatens, and Pacific Law Center and Solomon Ward are, therefore,  
18 entitled to injunctive relief.

19 **TENTH CLAIM FOR RELIEF**

20 **[Dilution of Mark]**

21 64. Pacific Law Center and Solomon Ward hereby incorporates paragraphs 1  
22 through 63, above.

23 65. Saadat-Nejad's acts have lessened the capacity of Pacific Law Center and  
24 Solomon Ward's famous marks to identify and distinguish Pacific Law Center and Solomon  
25 Ward's services. Saadat-Nejad's acts have blurred the unique association which had existed  
26 between Pacific Law Center and Solomon Ward's service marks and the services they offer,  
27 under those service marks.

28 66. Pacific Law Center and Solomon Ward's service marks are distinct and famous

1 marks. The Pacific Law Center and Solomon Ward marks are inherently strong and  
2 distinctive, have long been used in connection with services with which they appear, have  
3 long been the subject of substantial advertising and promotion, have been used and  
4 advertised throughout the United States, are widely recognized by consumers and those in  
5 the trade, are in substantially exclusive use—all as alleged above. Saadat-Nejad's acts were  
6 commenced and committed beginning at a time **after** Pacific Law Center and Solomon  
7 Ward's service marks have become famous.

8 67. Pacific Law Center and Solomon Ward are informed and believe that Saadat-  
9 Nejad committed these acts willfully and with the intent to trade on Pacific Law Center and  
10 Solomon Ward's reputation and to cause dilution of Pacific Law Center and Solomon Ward's  
11 famous marks.

12 68. As a result of Saadat-Nejad's acts, Pacific Law Center and Solomon Ward have  
13 suffered and will continue to suffer damage to their business, reputation and goodwill and  
14 the loss of clients and profits that Pacific Law Center and Solomon Ward would have  
15 enjoyed but for Saadat-Nejad's acts. Saadat-Nejad threatens to continue to do the acts  
16 complained of, and unless enjoined, will continue to do so to Pacific Law Center and  
17 Solomon Ward's irreparable damage. It would be difficult to ascertain the amount of  
18 compensation that could afford Pacific Law Center and Solomon Ward adequate relief for  
19 such continuing acts, and to do so a multiplicity of judicial proceedings would be required.  
20 Pacific Law Center and Solomon Ward's remedy at law is inadequate to compensate them  
21 for the injuries Saadat-Nejad's conduct threatens, and Pacific Law Center and Solomon Ward  
22 are, therefore, entitled to injunctive relief.

23 **ELEVENTH CLAIM FOR RELIEF**

24 **[Unauthorized Use of Name]**

25 69. Pacific Law Center and Solomon Ward hereby incorporate paragraphs 1  
26 through 68, above.

27 70. Saadat-Nejad's conduct as alleged constitutes the unauthorized use of the  
28 Solomon Ward name under the laws of the State of California, Civil Code §3344.

71. As a result of Saadat-Nejad's conduct, Solomon Ward has suffered and will continue to suffer damage to their reputation and goodwill and harm to their names which are famous within their profession.

72. In addition, Saadat-Nejad threatens to continue to do the acts complained of, and unless restrained and enjoined, will continue to do so to Solomon Ward's irreparable damage. It would be difficult to ascertain the amount of compensation that could afford Solomon Ward adequate relief for such continuing acts, and to do so a multiplicity of judicial proceedings would be required. Solomon Ward's remedy at law is inadequate to compensate it for the injuries Saadat-Nejad's conduct threatens, and Solomon Ward is, therefore, entitled to injunctive relief.

## PRAYER

Wherefore, Pacific Law Center and Solomon Ward pray for relief against Shahrokh. Saadat-Nejad, as follows:

1. For preliminary and permanent injunctive relief pursuant to the provisions of 15 U.S.C. §§1116 and 1125 and state law.

2. For actual money damages according to proof; but in an amount in excess of \$75,000 exclusive of interest and costs.

3. For an award of treble the amount of Pacific Law Center and Solomon Ward's actual damages.

4. For an award of punitive and exemplary damages.

5. For a finding that this case is “exceptional” and that Pacific Law Center and Solomon Ward shall be awarded their reasonable attorneys’ fees.

6. For prejudgment interest.

7. For restitution.

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- 8. For attorneys fees, costs and expenses.
- 9. And for such other and further relief as this Court deems just and proper.

DATED: March 13, 2007

SOLOMON WARD SEIDENWURM & SMITH, LLP

By:   
EDWARD J. MCINTYRE  
Attorneys for Pacific Law Center and Solomon  
Ward Seidenwurm & Smith, LLP

Pacific Law Center and Solomon Ward hereby demand a jury trial of all claims triable  
by a jury.

DATED: March 13, 2007

SOLOMON WARD SEIDENWURM & SMITH, LLP

By:   
EDWARD J. MCINTYRE  
Attorneys for Pacific Law Center and Solomon  
Ward Seidenwurm & Smith, LLP

## CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE SECOND PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

PACIFIC LAW CENTER, a Professional Law Corporation; and SOLOMON WARD SEIDENWURM & SMITH, LLP

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF San Diego  
(EXCEPT IN U.S. PLAINTIFF CASES)

## (c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Solomon Ward Seidenwurm & Smith, LLP  
401 B Street, Suite 1200

San Diego, California 92101  
(619) 238-4823

## DEFENDANTS

SHAHROKH SAADAT-NEJAD, an individual,

FILED  
07 MAR 13 PM 12:14  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT San Diego  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

## ATTORNEYS (IF KNOWN)

07 CV 0460 L POR

## II. BASIS OF JURISDICTION (PLACE AN 'X' IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN 'X' IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- |   | PT                         | DEF                        |   | PT                         | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.

DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

USC 1121.

15 USC 1051; 28 USC 1331, 28 USC 1338 and 15

## V. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 161 Medicare Act <input type="checkbox"/> 162 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 163 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 196 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 360 Motor Vehicle <input type="checkbox"/> 365 Motor Vehicle Product Liability <input type="checkbox"/> 380 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 626 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 750 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (13958) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reappointment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 460 Commerce/ICC Rates/etc. <input type="checkbox"/> 480 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 610 Selective Service <input type="checkbox"/> 860 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 896 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 246 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motion to Vacate Sentence <b>HABEAS CORPUS:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions		

## VI. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding  
☐ 2 Removal from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 75,000+int/costs  
 CHECK YES only if demanded in complaint:  
 JURY DEMAND: ☐ YES ☐ NO

## VIII. RELATED CASE(S) IF ANY

JUDGE

Docket Number

DATE

March 13, 2007

SIGNATURE OF ATTORNEY OF RECORD

Edward J. McIntyre

135996 \$350 sel 3/13/07



UNITED STATES  
DISTRICT COURT  
Southern District of California  
San Diego Division

# 135996 - A  
March 13, 2007

Code	Case #	Qty	Amount
CV006900	3-07-CV-0460		60.00 CH
Judge	- LORENZ		
CV006400			100.00 CH
CV510000			190.00 CH

Total--> 350.00

FROM: CIVIL FILING  
PACIFIC LAW CENTER ET AL V.  
SHAIROKH SAADAT-NEJAD  
BC# 0403 SH