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

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8 **UNITED STATES DISTRICT COURT**

9 **SOUTHERN DISTRICT OF CALIFORNIA**

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

13   Plaintiffs,

14   v.

15 SHAHROKH SAADAT-NEJAD, an
individual,
16

17   Defendant.

CASE NO. 07-CV-00460 LAB (POR)

**REQUEST TO ENTER DEFAULT UNDER
FEDERAL RULE OF CIVIL PROCEDURE
55(a)**

Courtroom: 9

Hon. Larry Alan Burns

18   TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, SOUTHERN

19 DISTRICT OF CALIFORNIA.

20   Plaintiffs Pacific Law Center and Solomon Ward Seidenwurm & Smith, LLP, request

21 that the Clerk of this Court enter default in this matter against defendant Shahrokh Saadat-

22 Nejad on the ground that he has failed to answer the complaint, or file a motion permitted

23 by Federal Rule of Civil Procedure 12, within the time prescribed by the Federal Rules of

24 Civil Procedure. Plaintiffs served the complaint on Shahrokh Saadat-Nejad on March 14,

25 2007, evidenced by the proof of personal service of summons and complaint on file with

26 this Court.

27 / / /

28 / / /

P:304876.1:57122.003   07-CV-00460 LAB (POR)
REQUEST TO ENTER DEFAULT UNDER FEDERAL RULE OF CIVIL PROCEDURE 55(a)

1   The above stated facts are supported by the declaration of Edward J. McIntyre, filed

2   concurrently herewith.

3

4   DATED: May 8, 2007   SOLOMON WARD SEIDENWURM & SMITH, LLP

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6   By: /s/ Edward J. McIntyre
                                       EDWARD J. MCINTYRE
7   Attorneys for Pacific Law Center and Solomon
                                       Ward Seidenwurm & Smith, LLP
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1	<u>**CERTIFICATE OF SERVICE**</u>
2	I caused the **REQUEST TO ENTER DEFAULT UNDER FEDERAL RULE OF CIVIL**
3	**PROCEDURE 55(a)** to be served in the following manner:
4	<u>Electronic Mail Notice List</u>
5	The following are those who are currently on the list to receive e-mail notices for this
6	case.
7	**<u>Electronic Mail Notice List</u>**
8	**NONE.**
9	
10	I manually served the following:
11	Shahrokh Saadat-Nejad

Shahrokh Saadat-Nejad
3713 Mt. Ashmun Place
San Diego, CA 92111
VIA U.S. MAIL

/s/ Edward J. McIntyre
EDWARD J. MCINTYRE