

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  
 Ward Seidenwurm & Smith, LLP  
 6  
 7

8 **UNITED STATES DISTRICT COURT**  
 9 **SOUTHERN DISTRICT OF CALIFORNIA**

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 Defendant.

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

**DECLARATION OF EDWARD J.  
 MCINTYRE IN SUPPORT OF PACIFIC  
 LAW CENTER AND SOLOMON WARD  
 SEIDENWURM & SMITH, LLP'S  
 APPLICATION FOR A TEMPORARY  
 RESTRAINING ORDER AND ORDER TO  
 SHOW CAUSE FOR A PRELIMINARY  
 INJUNCTION**

Date: Not Yet Scheduled  
 Time: Not Yet Scheduled  
 Courtroom: 14

Hon. M. James Lorenz

19  
 20  
 21  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 I, Edward J. McIntyre, declare:

2 1. I am a member of the State Bar and a partner at Solomon Ward Seidenwurm &  
3 Smith, LLP, counsel for Pacific Law Center and Solomon Ward and general counsel to the  
4 firm. I have personal knowledge of the facts in my declaration.

5 2. I represent Pacific Law Center both in this case and in an action in superior  
6 court, *Pacific Law Center v. Saadat-Nejad*, Case No. GIC 878352.

7 3. On behalf of Pacific Law Center, I dismissed the defendant, ushostage.com,  
8 from the state-court action as a precondition that Saadat-Nejad imposed before he would  
9 meet to see if this dispute could be resolved.

10 **Friday Meeting with Saadat-Nejad.**

11 4. On Friday, March 15, 2007, I invited Saadat-Nejad to meet at our offices with,  
12 Thomas Slattery, a supervising criminal law attorney at Pacific Law Center, Matthew  
13 Spiegel—whom Saadat-Nejad insisted be present—and me.

14 5. Saadat-Nejad showed up with, among other items, a tape recorder and a  
15 baseball bat. That notwithstanding, we met with him for four hours or more to see if we  
16 could reach resolution.

17 6. Mr. Slattery and I, as of Friday evening, were hopeful.

18 7. After a telephone conversation with Saadat-Nejad on Monday morning,  
19 however, and based on other actions he took on Monday, Pacific Law Center and Solomon  
20 Ward conclude that it is necessary for them to come to this Court and seek both a temporary  
21 restraining order and an order to show cause for a preliminary injunction.

22 **Solomon Ward.**

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

25 9. Solomon Ward has used the exclusive service marks and trade names  
26 “Solomon Ward Seidenwurm & Smith” and “Solomon Ward” in its professional business.

27 10. Solomon Ward has registered the internet domain names “swsslaw.com” and  
28 “solomonward.com” and has operated internet sites at “swsslaw.com” to make the public

1 aware of its professional practice.

2 11. Solomon Ward has, over the years, built up valuable good will in its service  
3 marks and trade names and the general public has come to associate those names  
4 exclusively with Solomon Ward's professional practice in San Diego, throughout California  
5 and across the nation.

6 **Superior Court Suit.**

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

9 13. On February 23, 2007, Pacific Law Center retained Solomon Ward to  
10 represent it in that lawsuit.

11 14. On February 27, 2007, Solomon Ward successfully obtained a superior court  
12 temporary restraining order against Saadat-Nejad. The original order the court signed  
13 restrained Saadat-Nejad:

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

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

18 On March 9, 2007, the superior court extended that temporary restraining order until  
19 an April 20, 2007 hearing.

20 15. At a March 14, 2007 hearing, the superior court explained or modified its  
21 February 27 order that Saadat-Nejad is restrained from using the website/domain name  
22 "pacificlawcenters.com."

23 **Saadat-Nejad's Attack on Solomon Ward.**

24 16. On March 10 or 11, Saadat-Nejad registered "solomonwardlawfirm.com" a  
25 confusingly similar domain name to the names Solomon Ward owns.<sup>1</sup>

26 17. Based on my Monday telephone conversation with him, Saadat-Nejad has

27 <sup>1</sup> I attach true and correct samples of pages from the solomonwardlawfirm.com and  
28 solomonwardsandiego.com websites.

1 made clear that he will not stop using the Solomon Ward mark and trade name. He further  
2 made clear that he intends to continue his vendetta against Solomon Ward because it is  
3 representing Pacific Law Center in both the state and this action.

4 18. Saadat-Nejad, through a lawyer purporting to represent him, told Pacific Law  
5 Center that unless it pays him \$500,000 he will continue to use its domain name. Saadat-  
6 Nejad reiterated that threat at the meeting Friday evening at my office.

7 19. Solomon Ward has already had inquiries about the pirate site that Saadat-  
8 Nejad has used. Solomon Ward has already suffered irreparable harm as a result of Saadat-  
9 Nejad's conduct and it will continue to suffer irreparable harm unless this Court stops him.

10 20. There is no way accurately to determine the whole of the harm that Saadat-  
11 Nejad has done to Solomon Ward and its reputation and the reputation of its attorneys. As a  
12 result, money damages are inadequate to repair that harm. In that respect, Solomon Ward  
13 has suffered and continues to suffer irreparable harm and will do so until this Court stops  
14 Saadat-Nejad.

15 I declare on penalty of perjury under the laws of the State of California and United  
16 States of America that the facts set forth in this declaration are true and correct, based on my  
17 own personal knowledge, and that I executed this declaration in San Diego, California on  
18 March 21, 2007 at San Diego, California.

19 /s/ Edward J. McIntyre  
20 EDWARD J. MCINTYRE

21  
22  
23  
24  
25  
26  
27  
28

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

**CERTIFICATE OF SERVICE**

I caused the DECLARATION OF EDWARD J. MCINTYRE IN SUPPORT OF PACIFIC LAW CENTER AND SOLOMON WARD SEIDENWURM & SMITH, LLP'S APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE FOR A PRELIMINARY INJUNCTION to be served in the following manner:

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

Electronic Mail Notice List

NONE.

I manually served the following:

Shahrokh Saadat-Nejad  
3713 Mt. Ashmun Place  
San Diego, CA 92111  
**VIA FEDERAL EXPRESS**

/s/ Edward J. McIntyre \_\_\_\_\_  
EDWARD J. MCINTYRE

Welcome to SolomonWardSanDiego.com

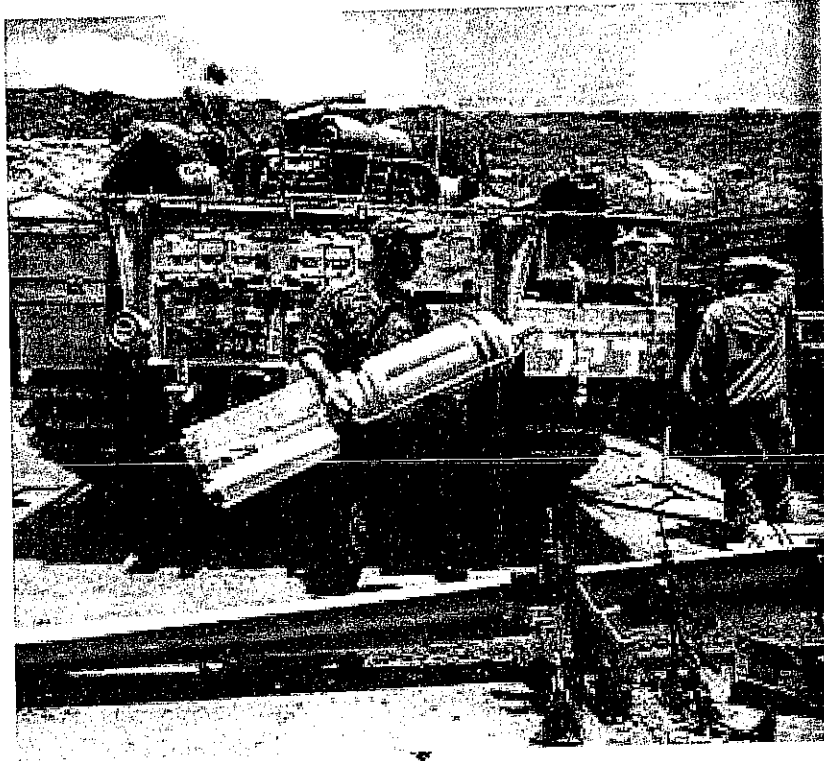
Open 24hrs Everyday 100% FREE Global

- [SolomonWardSanDiego.com](http://SolomonWardSanDiego.com)

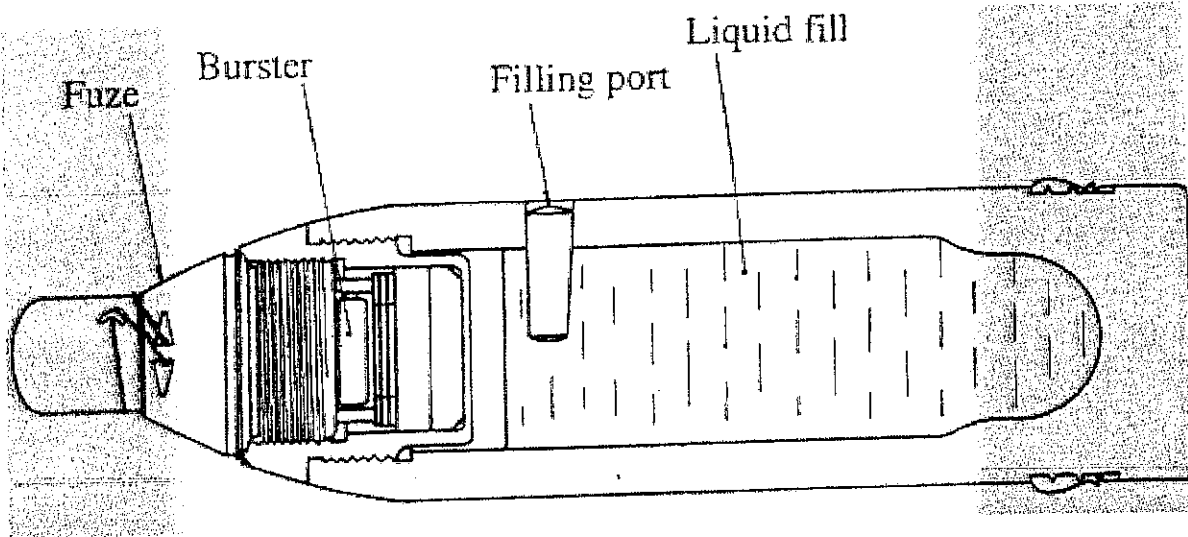
Asalamoalaikum, Shalom, Hello, Bonjour, hallo, hola, Merhaba, Ciao

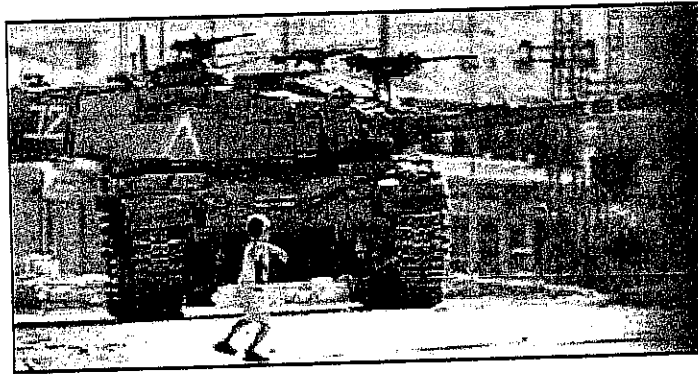












**NEW** On December 11, 2006 For the first time U.S. Government Backed Israel Terrorists publicly admitted its possession of nuclear weapons. Israeli Prime Minister Ehud Olmert confessed that Israel possessed

of nuclear weapons.

In an interview with the German N24 SAT 1 TV channel, U.S. Backed Israel Zionist Terrorist Prime Minister, Ehud Olmert said "Iran openly, explicitly, and publicly threatens to whip Israel off the map, Can you say that this is the same level when they are aspiring to have nuclear weapons, as America, France, Israel, Russia?"

U.S. Backed Israeli Zionist Terrorist Infrastructure Minister Binyamin Ben Eliezer, in reference to Ehud Olmert's nuclear confession, said: "I recommend those who want to talk about this issue remain silent for God and the national security's sake."

On December 5, 2006 Robert Gates, the United States Secretary of Defense has candidly acknowledged that Israel has Nuclear Weapons.

"They [the Iranians] are surrounded by powers with nuclear weapons—Pakistan to their east, the Russians to the north, the Israelis to the west and us [the United States] in the Persian Gulf," - Robert Gates (Senate Committee confirmation hearing).

~~Serial numbers and markings on explosives used in Iraq~~ provide "pretty good" evidence that Iran is providing either weapons or technology for militants there, United States Defense Secretary Robert Gates asserted in Febuary of 2007.

Febuary of 2007 United States Defense Secretary Robert Gates said, "I think there's some serial numbers, there may be some markings on some of the projectile fragments that we found," that point to Iran.

USHOSTAGE.com says from the beginning of the invasion of Iraq by the United States Government, CIA and Israel Mossad Zionist Terrorist backed Mojahedin-e-Khalq Terrorists have been involved in setting up fake check points in Iraq with Iranian Traitors in

**Iranian Military Uniforms to give the image to Iraqi citizens that Iran is trying to invade Iraq. This was also done by the United States Government during Operation Desert Storm in 1991.**

**As for allegations of Iran made weapons with serial numbers and markings on the weapons, what the CIA and the Israel Mossad Zionist Terrorists have been doing is providing wahabi terrorists with weapons that have no serial numbers on them, not because they have scrubbed away the serial numbers, but because thats how the manufactures have made them for the Zionists to use in their terrorist operations. They the manufacturers also have been making weapons that look like they were made in Iran with serial numbers and markings as proof. "By Way Of Deception, Thou Shalt Do War"**

**United States maybe ready to make a truce deal with the Taliban and Al-Qaeda. Assassination of Pakistan President General Pervez Musharraf will be part of the truce deal. United States Government psychological plan to sell this bull crap to the general public is that the Taliban were not the extremists, but it was Al-Qaeda whom are the extremists. In short the U.S. Government will say Al-Qaeda infiltrated the Taliban.**

**USHOSTAGE.com says the Taliban and Al-Qaeda are nothing but a group of Wahabi thugs with deep pockets full of cash. Any Idiot (Wahabi) can go to the Taliban and get paid for a days work of attacking Americans. Thats how they get so many people to fight with them. In Afghanistan a Wahabi can get \$40 to \$60 American money per day for fighting for the Taliban. If the Wahabi knows how to use a shoulder guided missile, then he can get paid \$20 per missile that hits the target.**

**In Iraq it is the same, but it is the U.S. Backed Israel Zionist Mossad Terrorists that is doing the paying without the Wahabi knowing it, because he is blinded by revenge and/or money. This same pattern exists with Non-Wahabi.**

**Terrorists 9/11 Confession: "Our Purpose was to document the event"  
These Terrorists started filming the WTC on 9/11 BEFORE the first plane hit.**

Solomon Ward Seidenwurm & Smith (Solomon Ward Attorneys at Law) in California and Pacific Law Center in California have filed a lawsuit against me in The Superior Court of California (State) Case No. GIC878352 on January 12, 2007 and Pacific Law Center and Solomon Ward Seidenwurm & Smith (Solomon Ward Attorneys at Law) have filed lawsuit against me in The United States District Court (Federal) Case No. 3:2007CV00460 on March 13, 2007 all in part of railroading me in to jail or prison for criminal case No. CD200499 which the prosecutors are suppressing evidences and witnesses to shut me up.

There are 3 different court cases all at the same time pending against me with corruption in all 3 court cases all to shut me up about your civil rights and about Israel Zionist Terrorists having and using Weapons of Mass Destruction as you can see in the pictures which is the main reason that Solomon Ward Seidenwurm & Smith (Solomon Ward Attorneys at Law) are the attorneys on record for Pacific Law Center on both civil cases.

Pacific Law Center and Solomon Ward Seidenwurm & Smith Attorneys are Hustlers, Thieves, Zionist Terrorists. Do Not Hire Them.

**CALL US: (646) 225-8213**

Email us: [PacificLawCenters@yahoo.com](mailto:PacificLawCenters@yahoo.com)

Visit us at: [Pacific-Law-Center.com](http://Pacific-Law-Center.com)

**WARNING: DO NOT HIRE**

**PACIFIC LAW CENTER -  
CALIFORNIA USA  
OWNED BY  
PHILLIPS & ASSOCIATES -  
ARIZONA USA**

Pacific Law Center packages itself very well - They have made themselves a Public Icon by heavy advertising spending in the tens of millions of dollars. Below are some civil complaints filed against the "Over 150 years of combined experience" Pacific Law Center.

[1] CIVIL CASE No.GIC879397 - LUCKMAN, CHARLES vs. PACIFIC LAW CENTER - Filed at San Diego 02/01/2007

[2] CIVIL CASE No.GIS26363 - GATEWAY CHULA VISTA 2, LLC vs. PACIFIC LAW CENTER - Filed at South County 09/28/2006

[3] CIVIL CASE No.GIC872419 - COSSIO, COLIN C vs. PACIFIC LAW CENTER - Filed at San Diego 09/13/2006

[4] CIVIL CASE No.GIC871101 - MELTZ, TODD CLAYTON vs. PACIFIC LAW CENTER - Filed at San Diego 08/18/2006

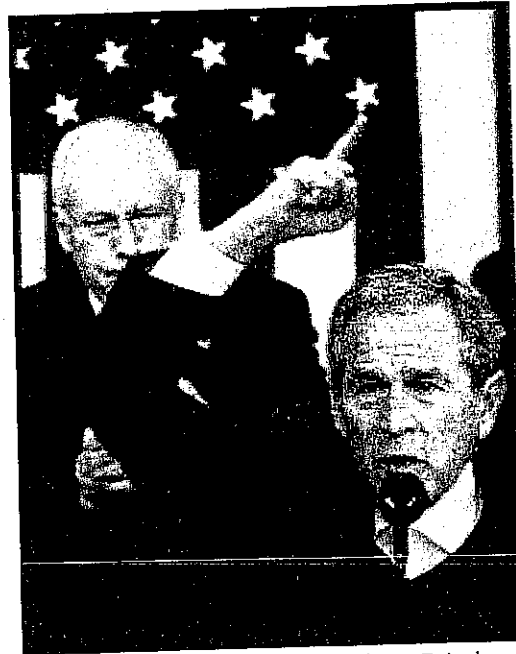
[5] CIVIL CASE No.GIC868515 - RHOAD, KRISTEN vs. PACIFIC LAW CENTER - Filed at San Diego 07/03/2006

[6] CIVIL CASE No.SN037043 - ZITO, PHYLLIS vs. PACIFIC LAW CENTER - Filed at North County 05/01/2006

[7] CIVIL CASE No.SC158346 - GOMEZ, ISABEL vs. PACIFIC LAW CENTER - Filed at Kearny Mesa 12/07/2004

[8] CIVIL CASE No.SC150154 - SANCHEZ, JOAQUIN TAPIA vs. PACIFIC LAW CENTER - Filed at Kearny Mesa 03/10/2004

There are many parallels to the controversy over intentional wrongdoings by Pacific Law Center.



"It Is Not Worth The Risk.  
Call and Hire Another Attorney."

**EXPOSING CORRUPTION AGAINST  
PHILLIPS & ASSOCIATES  
LAW FIRM**

AND

**PACIFIC LAW CENTER**

Warning: Video Contains Explicit Language

Please Visit us at:

SolomonWardLawFirm.com

&

USHOSTAGE.com

EXHIBIT 1  
PAGE 10

100% FREE

Welcome - 100% FREE Global Everyday - From USHOSTAGE.com

EXHIBIT 1  
PAGE 11





**EXHIBIT 1**  
**PAGE 12**

3/21/2007 1:59 PM

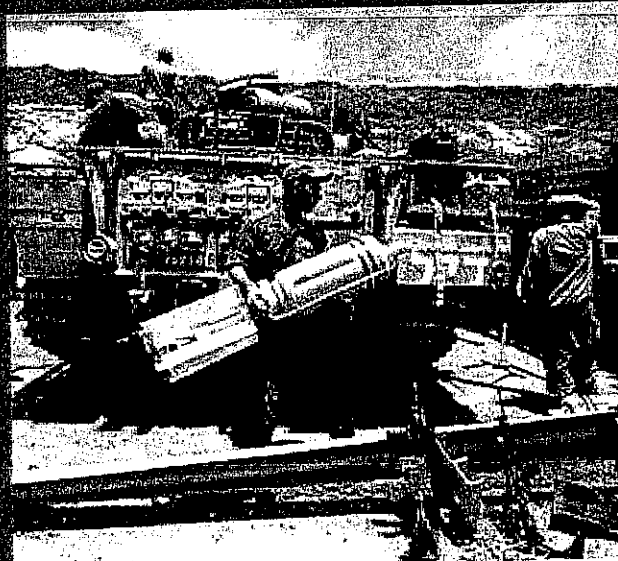
**EXHIBIT 1**  
**PAGE 13**

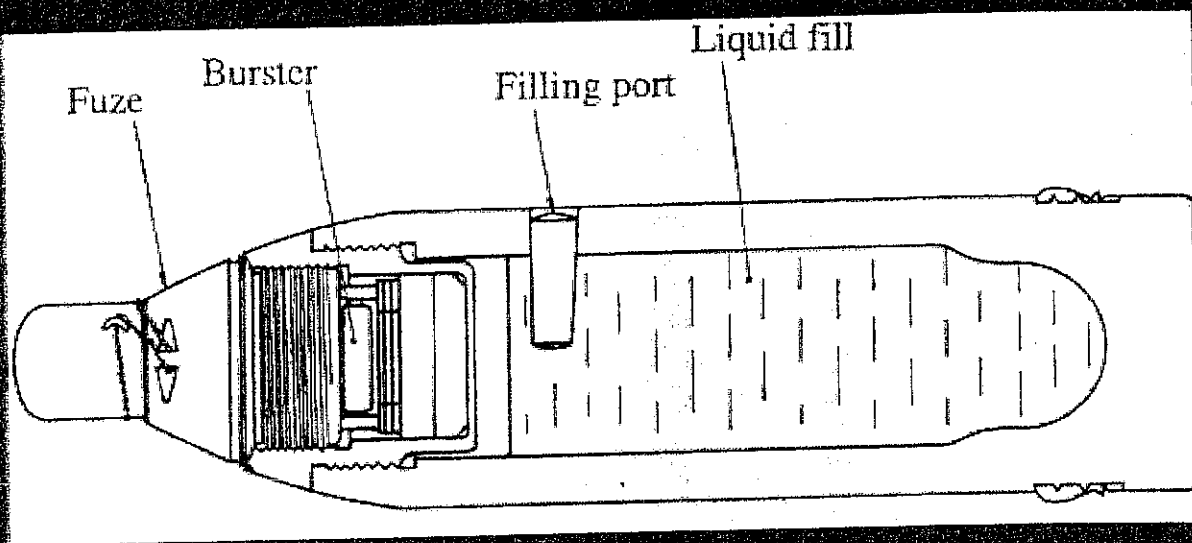
100% FREE

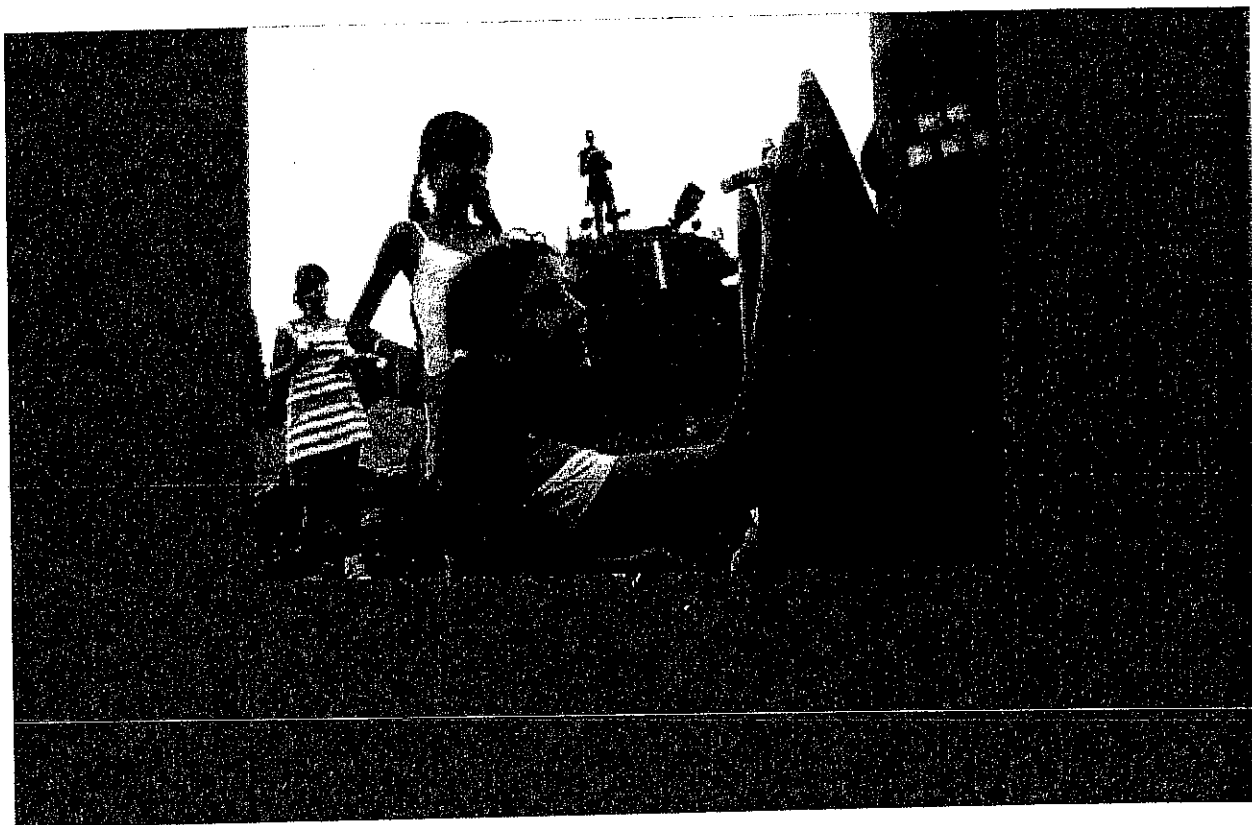
Welcome - 100% FREE Global Everyday - From USHOSTAGE.com



EXHIBIT 1  
PAGE 14







**EXHIBIT 1**  
**PAGE 17**

