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CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

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MAY 21 2007

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

SOLOMON WARD SEIDENWURM
AND SMITH,
PACIFIC LAW CENTER

CASE No.3:2007-CV-00460

Plaintiffs,

ANSWER

vs.

SHAHROKH SAADAT-NEJAD

Defendant.

Hon. Judge Larry Alan Burns

TO THE CLERK OF THE UNITED STATES DISTRICT COURT,
SOUTHERN DISTRICT OF CALIFORNIA, JUDGE LARRY ALAN
BURNS, JUDGE M. JAMES LORENZ, MAGISTRATE JUDGE
LOUIASA S. PORTER, AND TO ALL PARTIES ON RECORD.

1
2 1. I, Shahrokh Saadat-Nejad am the defendant for Civil Case No.3:2007-CV-
3 00460.

4
5 2. Attached to this document is EXHIBIT (A) which is excerpt copy of
6 "RESPONSE AND OPPOSE DEFAULT AND MOTION FOR CASE
7 DISMISSAL AND DECLARATION OF SHAHROKH SAADAT-NEJAD"
8 which was filed on May 14, 2007 in this court.


9
10 3. Attached to this document is EXHIBIT (B).

11 4. I am being denied of obtaining court transcripts for this case which I am
12 able to pay money for.

13
14 5. Court transcripts and audio tapes of recorded meetings with I and the
15 plaintiffs can and will prove at minimum crimes of persuasion.

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18 I declare under penalty of perjury under the laws of United States of
19 America that the forgoing is true and correct of my own personal knowledge.

20 Date: MAY 21, 2007

21 
22 SHAHROKH SAADAT-NEJAD
23 Defendant
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EXHIBIT

(A)

1 Shahrokh Saadat-Nejad
2 Mail: 3713 Mount Ashmun Place
3 San Diego, California 92111
4 Email: c9729972@yahoo.com
5 Telephone: (646)225-8213
6 Defendant

FILED

07 MAY 14 PM 2:18

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

DEPUTY

6 **UNITED STATES DISTRICT COURT**
7 **SOUTHERN DISTRICT OF CALIFORNIA**

9 SOLOMON WARD SEIDENWURM
10 AND SMITH,
11 PACIFIC LAW CENTER

CASE No.07-CV-00460

12 Plaintiffs,

13 RESPONSE AND OPPOSE
14 DEFAULT AND MOTION
15 FOR CASE DISMISSAL
16 AND DECLARATION OF
17 SHAHROKH
18 SAADAT-NEJAD

14 vs.

17 SHAHROKH SAADAT-NEJAD

18 Defendant.

18 Date: , 2007
19 Department:
20 Time:

21 Hon. Judge Larry Alan Burns

22 TO: THE CLERK OF THE UNITED STATES DISTRICT COURT,
23 SOUTHERN DISTRICT OF CALIFORNIA AND JUDGE ALAN LARRY
24 BURNS AND TO ALL PARTIES ON RECORD.
25 SHAHROKH SAADAT-NEJAD DECLARES:

26 I, Edward J. McIntyre did not serve me with a summons and or complaint of
27 this civil action case on March 14, 2007.
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2. On March 16, 2007 was the first time that I was verbally told by Edward J. McIntyre and Thomas Sluttery from Pacific Law Center that a civil action has been filed against me in a Federal Court. The meeting was recorded on audio tape(s). The tape(s) prove ongoing fraud and ongoing corruption by Judges.

3. I had no knowledge of Edward J. McIntyre filing a affidavit of personal service on March 29, 2007 until April 11, 2007 by walking in to the federal court building and looking up this case on the courts computer.

4. I filed a declaration on March 26, 2007 with this court.

5. I am not an Attorney.

6. I am illiterate of understanding the court rules, but I try my best and I did respond to this action by filing declaration(s) and making all court appearances.

7. On September 18, 2006 Pacific Law Center went to a San Diego, California court and waived my rights to appear in two criminal cases and got a continuance for both criminal cases while I was in Jail AFTER Pacific Law Center was fired on September 8, 2006.

8. Intentional civil rights violations on court record and yes, government prosecutors for both criminal cases were present in court when these violations happened.

9. Pacific Law Center and Solomon Ward Seidenwurm and Smith (Solomon Ward Attorneys at Law) with the blessings of government prosecutors have filed four complaints in different courts which includes The United States District Court, Southern District of California case No.07-CV-00460 against me in order to keep me silent. This is called fraud and railroading a person in jail and/or prison and railroading a person in contempt of court and violating freedom of speech.

10. On March 28, 2007 in Department No.2 Commissioner Rice of the Superior Court of California in San Diego County conspired with prosecutors and San Diego County by railroading the defendant to a guilty plea.

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11. Judge Richard E.L. Strauss of the Superior Court of California in San Diego County Case No.GIC878352 has signed an order off court record with no court reporter on February 27, 2007 without the defendant being present that the defendant shall not use the words "Pacific Law Center" in any published communication. Defendant made first court appearance regarding civil case No.GIC878352 on March 9, 2007.

12. Judge Larry Alan Burns of the United States District Court, Southern District of California in San Diego County Case No.07-CV-00460 has signed a order on March 29, 2007 that the defendant shall not register and trafficking in any internet website the words "Pacific, Law, Center, Solomon, Ward".

13. On April 26, 2006 Judge Larry Alan Burns of the United States District Court, Southern District of California in San Diego County Case No.07-CV-00460 has signed a order on April 27, 2007 that the defendant shall not register and trafficking in any internet website the words "Pacific, Law, Center, Solomon, Ward".

14. The plaintiffs alleged trademark names are "Pacific Law Center", "Solomon ward" and "Solomon Ward Seidenwurm & Smith".

15. Judge Larry Alan Burns of the United States District Court, Southern District of California in San Diego County states in his order that I can not use the words and names:

- "Pacific"
- "Solomon"
- "Center"
- "Smith"
- "Seidenwurm"
- "Ward"
- "Law"

in any internet wabsite or domain names that has even just one word or name mentioned above. Judge Larry Alan Burns of the United States District Court, Southern District of California in San Diego County is and has been very well aware that the plaintiffs have been misleading the court(s) and the plaintiffs manufacture and submit false evidences.

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2 16. Pacific Law Center hired Solomon Ward Seidenwurm & Smith
3 Attorneys only because of a Mr. Herbert J. Solomon of Solomon Ward
4 Seidenwurm & Smith has a reputation of access to Judges, and they have
5 proven that they Solomon Ward Attorneys at Law do have Judges in their
6 back pockets.

7 17. Pacific Law Center which is owned by Phillips & Associates Law Firm
8 that claims "Over 150 years of combined experience" and with 27 attorneys
9 that work for Pacific Law Center, and 40 attorneys that work for Phillips &
10 Associates Law Firm hire Mr. Herbert J. Solomon.

11 18. Two Law Firms with 67 Lawyers which represent clients in all 50 States
12 hire "Solomon Ward Seidenwurm & Smith" Attorneys at Law in San Diego,
13 California.

14 19. List of corrupt commissioners and judges that are involved are posted on
15 USGovernmentCourts.com.

16 20. The Defendant is a Muslim and a citizen of The Islamic Republic of Iran
17 and is the owner and operator of USHOSTAGE.com which at a minimum
18 exposes terrorists that use Chemical Warfare Weapons on humans, Israel
19 Zionist Terrorists that occupy Palestine while murdering humans, and
20 United States secret prisons that are being used to torture and murder humans.

21 21. The Plaintiffs are supporters of Israel Zionist Terrorists and the plaintiffs
22 hate Muslim Iranians.

23 22. In my Declaration filed on March 26, 2007 there are copies of parking
24 citations. See Exhibit (A) attached to this document. On the top and bottom
25 of each parking citation there are citation ticket numbers along with a bar
26 code on the bottom of each parking citation.

27 Parking Citation Numbers issued on February 25, 2006 on or around 04:00
28 all by the same San Diego Police Department Officer Badge ID No.2934.
Every two Parking Citation were placed on the same vehicle. [See Exhibit A]

License plate number 4BIX512

Parking Citation Number 100154962 states the time 02:05

Parking Citation Number 100154963 states the time 03:15

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License plate number 3HMU205
Parking Citation Number 100154964 states the time 02:05
Parking Citation Number 100154965 states the time 03:15

License plate number SGYT726
Parking Citation Number 100154966 states the time 02:05
Parking Citation Number 100154967 states the time 03:15

License plate number 4YHZ619
Parking Citation Number 100154968 states the time 02:05
Parking Citation Number 100154969 states the time 03:30

License plate number 3BFK469
Parking Citation Number 100154970 states the time 02:05
Parking Citation Number 100154971 states the time 03:30

What the San Diego Police Officer has done is issue two Parking Citation Tickets on each vehicle with different times written on the Parking Citations all in the same order on or around 4:00am.

Not only is this fraud but why did the San Diego Officer do this?

Where was this San Diego Police Officer on February 25, 2006 from 02:05 to 03:30. These Parking Citation Tickets all written in order with different times is the officers alibi for any alleged criminal activity against the San Diego Police Officer as if the Parking Citation Tickets are not a criminal activity itself.

The pattern of these Parking Citation Tickets shows fraud and this pattern has been going on for years from the same San Diego Police Officer. The same San Diego Police Officer has now been shuffling the Parking Citation Tickets and still issues two per vehicle.

I have complained about this to the San Diego City Attorneys Office, San Diego County District Attorneys Office and to The San Diego Police Department itself. None are willing to investigate, so I started to investigate myself.

1 Recently this San Diego Police Officer(s) vehicles from the Northern
2 Division has been seen at Bay Marina Drive. Bay Marina Drive is an area
3 where meth addicts and dealers linked to James Dalton and Aaron Fritz
4 commit crimes against runaway children. James Dalton owns websites of
5 kindrideshare.net and parkandride.us and Aaron Fritz is the operator of the
6 websites. the name kindrideshare.net can be found written on park benches,
7 under freeway bridges where runaways would be likely to see the name
8 kindrideshare.net.

9 Meth addicts and dealers that prey on children linked to James Dalton have
10 been issued many times, two Parking Citation Tickets on the same day by
11 the same San Diego Police Officer Badge ID No.2934. These meth addicts
12 and dealers do not complain about the Parking Citation Tickets. The dealers
13 and James Dalton pay it.

14 In my declaration filed in this court on March 26, 2007 on page number
15 seven item number thirty one I wrote about this San Diego Police Officer,
16 and not a single person including Judges and the Plaintiffs have brought up
17 the concern.

18 23. As stated in my declaration on page numbers four, five and six, filed in
19 this court on March 26, 2007 that on July 25, 2006 I was arrested and
20 booked in the San Diego County Jail (Central). After I was fingerprinted and
21 before I was to exchange my street clothes for jail clothes I was interrogated
22 by a high ranking San Diego County Deputy Sheriff regarding the horrible
23 events of September 11, 2001, my website USHOSTAGE.com, about ny
24 close to \$10,000 cash, why I have not become a American Citizen, the
25 events of what took place on July 25, 2006, medical marijuana, active
26 terrorist group agents of Mojahedin-e-Khalq, Sipah-e-Sahaba Pakistan,
27 Millat-e-Islamia, Mossad and even how I felt about Prophet Jesus.

28 I have the IP Address of the computer(s) that visited my website
USHOSTAGE.com on July 25, 2006 and July 26, 2006.

IP Address: 206.190.90.2 (206-190-25-2.gen.twtelecom.net)

IP Address: 66.27.52.146 (rrcs-66-27-52-146.west.biz.rr.com)

IP Address: 66.27.48.94 (rrcs-66-27-48-94.west.biz.rr.com)

From Israel which is occupied land by Zionist Terrorists IP Address:
81.199.145.58 (81.199.145.58.ipplanet.com)

1 Not a single person including Judges, Lawyers I hired, San Diego County
2 Public Defenders Office, San Diego City Attorneys Office, San Diego
3 County District Attorneys Office have brought up these issues.

4 24. My Passport from Islamic Republic of Iran and \$9,800 cash was taken
5 away from me on July 25, 2006 by the government.

6 On March 28, 2007 most of the false charges (allegations) against me were
7 dropped by the government and I was told by the San Diego County Deputy
8 District Attorney that I will get my Passport and cash back. The court gave
9 an order for me to get my Passport and cash back, and when I went to the
10 San Diego Police Department with the court order to get them back, I was
11 told that they do not have my Passport or cash, but another government
12 agency may but they do not know who. Bull Crap after Bull Crap from the
13 United States Government.

14 25. Pacific Law Center Civil complaints filed against me has nothing to do
15 with domain names but it has to do with be writing about these situations.
16 The United States Government has nothing to lose by me being vocal, but
17 the Private Attorney(s) that conspired with the United States Government do.
18 They will lose clients due to me exposing their corruption(s).

19 26. Judge(s) Granting Court Order(s) behind closed doors without a court
20 reporter, and without defendant having been served with the civil complaint,
21 Judges Ignoring defendants civil rights, Judges Intimidations and threats is
22 and will continue to be published on the World Wide Web by me.

23 27. Civil case No.GIC878352 filed January 12, 2007 at The Superior Court
24 of California, County of San Diego by Pacific Law Center, and Civil case
25 No.07-CV-00460 filed March 13, 2007 at The United States District Court,
26 Southern District of California by Pacific Law Center are fraud. Pacific Law
27 Center is seeking MONEY for the same allegation in both court cases, how
28 is this not against the law. Does that mean that I can file civil complaints
against Pacific Law Center in different courts (STATE and FEDERAL)
make the same allegations and demand MONEY in both courts? You the
Judges are a FRAUD.

29 28. I want my Passport and cash back that the government took away from
me. I do not want do make any deals with Pacific Law Center and specially

1 Solomon Ward Seidenwurm and Smith whom are/were board members of
2 terrorist organizations.

3 Israel is occupied land by child molesters which Pacific Law Center,
4 Solomon Ward Seidenwurm and Smith, and Phillips and Associates Law
5 Firm defend and make a living on. These attorneys and lawyers feed their
6 family with money they get from child molesters, pimps of child prostitution,
7 and child pornography. How convenient for the San Diego Police Officer.

8 29. Edward J. McIntyre from Solomon Ward Seidenwurm and Smith
9 declares on his webpage that he is "Selected among the Best Lawyers in
10 America, 1993-1994, 1995-1996, 1997-1998, 1999-2000, and 2001-2002 for
11 First Amendment Law", but he has knowingly filed manufactured evidences,
12 made false statements, filed false documents, and has knowledge of the First
13 Amendment Law so well that he knows how to violate and rape it with the
14 courts help. (<http://www.swsslaw.com/attorneys/edwardmcintyre/>)

15 30. Filing multiple law suites against the homeless in order to stop the
16 homeless from speaking is a crime. Judges granting orders and manipulating
17 order(s) on paper so the plaintiff(s) can abuse the homeless freedom of
18 speech is a crime, or is this just against Muslim Iranians?

19 31. On March 29, 2007 Judge Larry Alan Burns complained several times
20 on record to me that my declaration that I filed on March 26, 2007 is not
21 double spaced. It was my first time ever to respond to a federal civil action
22 and my first time to be in a federal court. I am homeless and very low
23 income and I can not afford right now to double space this document
24 because it will require me to buy more paper.

25 32. In my declaration that was filed in this court on March 26, 2007 in one
26 of the exhibits there are copies of pictures that are posted on my website
27 USHOSTAGE.com.

28 Pacific Law Center filed a civil complaint against my website
USHOSTAGE.com which had nothing to do with pacificlawcenters.com so I
filed some of the content that was/is on USHOSTAGE.com which is
pictures of Israel Zionist Terrorists using Biological and Chemical Weapons
against humans. Not a single person including Judges have brought up these
issues.

1 33. In 1998 I filed a law suit (Case No.CV774848) in The Superior Court of
2 California, County of Santa Clara against Wahabi Terrorists alleging at
3 minimum that they the Wahabis are raising money, and recruiting here in the
4 United States. The government never complained that I call the Wahabi
5 Talibans "Terrorists", but Judge Larry Alan Burns complains that I call
6 Israel Zionists "Terrorists".

7 If the Israel Zionist Terrorists pictures on my website (See exhibit B
8 attached to this document) were pictures of Arabs using Biological and
9 Chemical weapons with turbans on their heads I would not be harassed by
10 the plaintiffs, Judges, or the U.S. Government.

11 Your silence and ongoing attempts of keeping me silent of Israel Zionist
12 Terrorists that call themselves Jews using Biological and Chemical Weapons
13 against humans puts blood on your hands.

14 34. Patmont Motor Werks Inc. v. Gateway Marine Inc., C-96-2703 United
15 States District Court, Northern District of California 1997. Judge Thelton
16 Henderson found that the use of the trademark in the URL constituted
17 "nominative fair use."

18 Judge Larry Alan Burns has said that I can not use seven words and names
19 in a URL address. For example I can not use
20 100freelawyers.com/pacific_solomon_center.html, and this is nothing but
21 Judges doing favors for Solomon Ward Seidenwurm and Smith whom are
22 members of Terrorist Organization "American Israel Public Affairs
23 Committee - AIPAC" which are well known to have Judges in their back
24 pockets.

25 I declare under penalty of perjury under the laws of The United States of
26 America and the laws of The State of California that the forgoing is true and
27 cocorrect of my own personal knowledge.

28 Date: MARCH 14, 2007


Shahrokh Saadat-Nejad

EXHIBIT

(B)

Justice Department For Sale by United States of Israel:

On September 18, 2006 Pacific Law Center went to a San Diego California court and waived a defendants rights to appear in two criminal cases and got a continuance for both criminal cases while the defendant was in Jail AFTER Pacific Law Center was fired on September 8, 2006.

Intentional civil rights violations on court record and yes, government prosecutors for both criminal cases were present in court when these violations occurred.

Pacific Law Center and Solomon Ward Seidenwurm and Smith (Solomon Ward Attorneys at Law) with the blessings of government prosecutors have filed four complaints in different courts which includes The United States District Court, Southern District of California case No.07-CV-00460 against the the defendant in order to keep the defendant silent. This is called fraud and railroading a person in jail and/or prison and railroadind a person in contempt of court and violating freedom of speech.

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Pacific Law Center hired Solomon Ward Seidenwurm & Smith Attorneys only because of a Mr. Herbert J. Solomon of Solomon Ward Seidenwurm & Smith has a reputation of access to Judges

and they have proven that they Solomon Ward Attorneys at Law do have Judges in their back pockets. Think about it..... Pacific Law Center which is owned by Phillips & Associates Law Firm that claims "Over 400 years of combined experience" and with 27 attorneys that work for Pacific Law Center, and 40 attorneys that work for Phillips & Associates Law Firm hire Mr. Herbert J. Solomon.

Two Law Firms with 67 Lawyers which represent clients in all 50 States Federal and State Courts hire "Solomon Ward Seidenwurm & Smith" Attorneys at Law in San Diego, California

The Defendant is a Muslim and a citizen of The Islamic Republic of Iran and is the owner and operator of USHOSTAGE.com which at a minimum exposes Israel Zionist Terrorists that use Chemical Warfare Weapons on humans, Zionist Terrorists that occupy Palestine while murdering humans, and United States secret prisons that are being used to torture and murder humans.

Attorneys Herbert J. Solomon, Michael D. Breslauer, Adam R. Rosenthal, Jeffrey H. Silberman of "Solomon Ward Seidenwurm & Smith Attorneys at Law in San Diego, California" are or were at minimum Presidents and or Board Members of Barbaric Israel Zionist Terrorist Organizations Hillel - (Brandeis Zionist Alliance), and United Jewish Federation - (Congregation Beth Israel)



Judge Larry Alan Burns

U.S. District Court Judge of the Southern District of California
(San Diego)



Kevin Cole

Interim Dean and Professor of Law University of San Diego



Solomon Ward Seidenwurm & Smith, LLP

- Michael Abramson
- Michael Breslauer
- Lawrence Kaplan
- Paul Metsch
- Elizabeth Mitchell
- Miguel Smith
- John Roberts



Orly Lobel

Orly Lobel Background:

2007 Assistant Professor of Law at University of San Diego School of Law full-time faculty member today

1998 - 1999 Law Clerk for Justice Professor Itzhak Zamir on the Israeli Supreme Court

1998 The **Israeli Parliament (Knesset)** Award of Academic Excellence

1991 - 1992 - 1993 Israel Defense Forces, Commander, **Israel Military Intelligence**, The TALPIOT project of the **Israel Military Intelligence**, including a seven months pre-service training in International Relations, Arabic, and Physics. Positions Held: Commanding post, instructor, director of a division.

Judge Larry Alan Burns, Kevin Cole, Solomon Ward Seidenwurm & Smith, and Orly Lobel all work together at minimum on projects at University of San Diego - School of Law.

<http://www.sandiego.edu/usdlaw/docs/pubs/advocate/Su06advocate.pdf>

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3 **CERTIFICATE OF SERVICE**
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5 I Shahrokh Saadat-Nejad served SOLOMON WARD SEIDENWURM &
6 SMITH with "ANSWER" in the manner of VIA U.S. MAIL and I
7 personally dropped off a copy at:
8

9 SOLOMON WARD SEIDENWURM & SMITH
10

11 401 B Street, Suite 1200

12 San Diego, California 92101
13

14
15 Date: MAY 21, 2007


16 Shahrokh Saadat-Nejad
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