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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.
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CASE NO. 07-CV-00460 LAB (POR)
**EX PARTE APPLICATION FOR AN ORDER
 TO SHOW CAUSE CONCERNING
 SAADAT-NEJAD'S CONTEMPT OF THIS
 COURT'S APRIL 26, 2007 PRELIMINARY
 INJUNCTION ORDER**
 Date: To Yet Scheduled
 Time: To Yet Scheduled
 Courtroom: 9
 Hon. Larry Alan Burns

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I
INTRODUCTION

Pacific Law Center and Solomon Ward respectfully request that this Court issue an order to show cause why Saadat-Nejad should not be found in contempt for his willful and deliberate violation of the preliminary injunction this Court issued on April 26, 2007 and set a hearing date and briefing schedule.

II
BASIS FOR AN ORDER TO SHOW CAUSE

As the transcripts of both the March 29, 2007 hearing—at which this Court issued a temporary restraining order—and the April 26, 2007—hearing, at which this Court issued the preliminary injunction—make unequivocally clear, this Court patiently told Saadat-Nejad what he could not do, and the consequences.

As the Court said:

I'm going to give you the benefit of the doubt, but I want to remind you again. I issued a preliminary injunction against you now and the injunction is in effect. I've had two conversations with you where I've delineated what is permissible and what's not, and I think you and I both know, and everybody here, even those that aren't Internet savvy, understand where the line is, what you can and can't do. If it comes back to me, not through a cache engine, but **there's a new registration of a domain name that involves one of these law firms such that I look at it and say, hmm, I think what Mr. Saadat is doing is playing games again. I think he's trying to create a domain name here that's so similar that if somebody is looking for Solomon Ward or Pacific Law Center, that they may click on his, and then they're going to be exposed to all this negative information that he has about them. If that happens, you are going to be in violation of the injunction, and having spent time with you now twice, patiently listened to you, I'm not going to tolerate a violation of the rule. You're going to go to jail, and I say that not to threaten you, but I want you to understand that there's consequences to violating court orders.**¹

Saadat-Nejad has new domain names. One is “pacificlawyerscenter.com.” On it, the Court will find some of the same racist rant that filled papers he filed with this Court.

He also now has “solomonwardswsslawcom.aspx.” If the Court clicks on that site, the Court will also be taken to the same unvarnished racism. And there is

¹ Transcript of April 26, 2007 hearing, 22:12-23:8. [Emphasis added.]

1 "solomonwardpacificlawcenter.aspx."

2 Pacific Law Center's counsel has "googled" Pacific Law Center and was taken to,
3 among others, "pacificlawyerscenter.com." As this Court may recall, one of Pacific Law
4 Center's domain names is "pacificlawcenter.com." Solomon Ward's counsel, when he
5 "googled" Solomon Ward, found, among other sites, "solomonwardswsslawcom.aspx" and
6 solomonwardpacificlawcenter.aspx." The Court will remember that one of Solomon Ward's
7 registered domain names are "solomonward.com," and "swsslaw.com." Saadat-Nejad also
8 has "phillipslawphillipsandassociatesphoenixarizonadui.aspx" and "solomonward
9 seidenwurmandsmithsandiegorealestateconstructionlitigationattorneyslawyers.aspx."

10 This Court's preliminary injunction barred Saadat-Nejad from:

- 11 1. Registering and trafficking in any internet website or domain name that
12 contains the words Pacific, Law and Center, with or without other words or symbols, in any
13 respect whatsoever;
- 14 2. Registering and trafficking in any internet website or domain name that
15 contains the words Solomon and Ward, with our without other words or symbols, in any
16 respect whatsoever;
- 17 3. Registering and trafficking in the service mark or trade name Pacific Law
18 Center in any respect whatsoever; and
- 19 4. Registering and trafficking in the service mark or trade name Solomon Ward or
20 Solomon Ward Seidenwurm & Smith in any respect whatsoever.

21 This Court warned Saadat-Nejad:

22 If you come back here having crossed the line or even having chalk on your
23 shoes, you know, from walking close to the line and **I get the impression that**
24 **you're trying to defy the court order deliberately, you're trying to do**
25 **something that's pushing the envelope, then there's going to be problems.** If
26 you violate the court order, then I will schedule an order to show cause, and if
27 you're found in violation after a hearing, you'll be in contempt, and one of the
28 penalties for contempt is going to jail. I don't want to put you in jail, but I
want the order to be followed. I don't do this for my health, and it's costing
Solomon Ward, it's costing Pacific Law Center, and it's costing you.²

² Transcript of April 26, 2007 hearing, 31:7-18.

