

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
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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)

**REPLY MEMORANDUM IN SUPPORT OF
 ORDER TO SHOW CAUSE RE SAADAT-
 NEJAD'S CONTEMPT OF THIS COURT'S
 APRIL 26, 2007 PRELIMINARY
 INJUNCTION ORDER**

Date: July 12, 2007
 Time: 12:00 noon
 Courtroom: 9

Hon. Larry Alan Burns

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THE ONLY ISSUE BEFORE THE COURT

The issue is not Saadat-Nejad’s complaint about Pacific Law Center’s brief representation of him; nor Solomon Ward’s representation of Pacific Law Center; not even Saadat-Nejad’s racist, anti-Semitic rant. The **only** issue is whether Saadat-Nejad can flaunt his disobedience of this Court’s orders.

The Evidence Speaks for Itself.

There is no need for a computer with Internet capacity in the courtroom at the hearing—as Saadat-Nejad demands. All this Court has to do is enter pacificlawyerscenter.com into its web browser. The result says it all.

The Only Solution.

A temporary restraining order did not work; neither did a preliminary injunction. Nor did the Court’s two extended and patient colloquies that warned Saadat-Nejad not to “get chalk on his shoes.”

Saadat-Nejad’s response to the order to show cause says it all—“...filing multiple cases against me (Criminal or Civil) **will not keep me silent.**”¹ While free, he will not obey. Regrettably, the only solution is for this Court to use its coercive powers to ensure obedience with its orders. Otherwise, we surrender to chaos.

DATED: July 9, 2007

Respectfully submitted,
SOLOMON WARD SEIDENWURM & SMITH, LLP

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

¹ Saadat-Nejad’s July 6, 2007 Response to Alleged Contempt, 5:18-19. [Emphasis added.]

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CERTIFICATE OF SERVICE

I caused the **REPLY MEMORANDUM IN SUPPORT OF ORDER TO SHOW CAUSE RE SAADAT-NEJAD'S CONTEMPT OF THIS COURT'S APRIL 26, 2007 PRELIMINARY INJUNCTION ORDER** 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