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

**DECLARATION OF EDWARD J.
 MCINTYRE**

Date: July 25, 2007

Time: 12:15 p.m.

Courtroom: 9

Hon. Larry Alan Burns

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1 I, Edward J. McIntyre, declare:

2 1. I am a member of the Bar of this Court, and a partner at Solomon Ward
3 Seidenwurm & Smith, LLP, counsel for Pacific Law Center and Solomon Ward. I personally
4 know the facts in my declaration.

5 **Saadat-Nejad's Self-Representation.**

6 2. Shahrokh Saadat-Nejad has, both in the superior court and this Court, insisted
7 on representing himself.

8 3. Indeed, this whole matter began when Saadat-Nejad fired his appointed—
9 public defender—counsel in a superior court criminal action and then hired, and
10 subsequently fired, Pacific Law Center. Thereafter, Saadat-Nejad fired his reappointed
11 public defender and represented himself in the criminal proceeding. In that respect, he has
12 bragged about the result he achieved for himself.

13 4. At both the March 28 temporary restraining order hearing and the April 26
14 preliminary injunction hearing, Saadat-Nejad represented himself. In each proceeding, he
15 has filed papers on his own behalf.

16 **Harm to Solomon Ward and Pacific Law Center.**

17 5. As the chairman of Solomon Ward's litigation department, one of my
18 responsibilities is recruiting new litigators.

19 6. During a recent—within the last two weeks—interview of a prospective new
20 associate, I asked him what he would like me to tell him about the firm. He immediately
21 mentioned all of the Saadat-Nejad anti-Semitic and other postings that he found when he
22 "Googled" Solomon Ward.

23 7. As a consequence, I spent the next 20 minutes of the interview explaining
24 Saadat-Nejad, his antipathy toward the firm merely because we represent Pacific Law
25 Center, and the proceedings in this Court.

26 8. In our recruiting effort, we constantly run advertisements in, among others,
27 legal publications. We have no way of knowing how many potential fine young lawyers
28 have not responded to us because they found the same materials—all of which infringe

1 Solomon Ward's registered domain names and violate this Court's orders.

2 9. In tandem, there is no way to determine how many potential clients have
3 avoided Pacific Law Center for the very same reason.

4 10. Accordingly, Solomon Ward and Pacific Law Center respectfully request this
5 Court to enter an order directing the hosts of Saadat-Nejad's websites previously identified to
6 this Court, and adjudged to violate this Court's orders, immediately to remove his offending
7 websites.

8 I declare on penalty of perjury under the laws of the State of California and United
9 States of America that the facts in this declaration are true and correct, based on my own
10 personal knowledge, and that I executed this declaration in San Diego, California on July 24,
11 2007 at San Diego, California.

12 */s/ Edward J. McIntyre*
13 EDWARD J. MCINTYRE

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CERTIFICATE OF SERVICE

I caused the **DECLARATION OF EDWARD J. MCINTYRE** 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

David Blaire-Loy, Esq.
ACLU Foundation of San Diego & Imperial Counties
P.O. Box 87131
San Diego, CA 92101
Telephone: (619) 232-2121

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