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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.
 17

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

**PACIFIC LAW CENTER AND
 SOLOMON WARD'S NOTICE OF
 MOTION AND MOTION FOR
 PERMANENT INJUNCTION**

Date: March 28, 2008
 Time: 10:30 a.m.
 Ctrm: 6, Third Floor

Hon. Janis L. Sammartino

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1 PLEASE TAKE NOTICE that on March 28, 2008 at 10:30 a.m., or as soon thereafter as
2 the matter may be heard, in Court PLEASE TAKE NOTICE that on November 2, 2007 at 1:30
3 p.m., or as soon thereafter as the matter may be heard, in Courtroom 6 of the U.S. District Court,
4 Southern District of California, 880 Front Street, San Diego, California, Pacific Law Center and
5 Solomon Ward will move this Court to enter a permanent injunction as follows:

6 Saadat-Nejad, and anyone acting in concert with him, is hereby permanently
7 enjoined and restrained from:

8 1. Registering, and trafficking in, any internet website or domain name that
9 contains the words Pacific, Law and Center, with or without other words or
10 symbols, in any respect whatsoever;

11 2. Registering, and trafficking in, any internet website or domain name that
12 contains the words Solomon and Ward, with or without other words or symbols, in
13 any respect whatsoever;

14 3. Registering and trafficking in the service mark or trade name Pacific Law
15 Center in any respect whatsoever; and

16 4. Registering and trafficking in the service mark or trade name Solomon
17 Ward or Solomon Ward Seidenwurm & Smith in any respect whatsoever.

18 The motion will be based upon this notice of motion and motion, the accompanying
19 memorandum of points and authorities, the declaration of Edward McIntyre and the Court's files
20 in this case, including , McIntyre Declaration, with Exhibits (Docket No. 3); Slattery Declaration,
21 with Exhibits (Docket No. 3); Phillips Declaration, with Exhibits (Docket No. 18); Supplemental
22 Memorandum, with Exhibits (Docket No. 18); McIntyre Declaration (Docket No. 36); McIntyre
23 Declaration (Docket No. 39); Exhibits in Notice of Lodgment, and specifically Exhibits 5 through
24 11 (Docket No. 39); McIntyre Declaration (Docket No. 48), the transcripts of the March 29, 2007

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1 and April 26, 2007 hearings (Docket No. 39, Exhibits 2 and 4); oral argument, and on such other
2 and further evidence as may be presented at the time of the hearing.

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DATED: November 15, 2007

Respectfully submitted,

SOLOMON WARD SEIDENWURM & SMITH, LLP

By: /s/ Edward J. McIntyre
EDWARD J. MCINTYRE
Attorneys for Pacific Law Center and Solomon
Ward

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CERTIFICATE OF SERVICE

I caused the **PACIFIC LAW CENTER AND SOLOMON WARD'S NOTICE OF MOTION AND MOTION FOR PERMANENT 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.

The following party who is not on the list to receive e-mail notices for this case. He therefore requires manual noticing, via Federal Express:

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

/s/ Edward J. McIntyre
EDWARD J. MCINTYRE