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

BY: *CF* DEPUTY

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7 Defendant – Pro Per

8
9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11
12 PACIFIC LAW CENTER and SOLOMON
13 WARD SEIDENWURM & SMITH

14 Plaintiffs

15 vs

16
17 SHAHROKH SAADAT-NEJAD

18 Defendant.

CASE No.07cv0460 JLS

**DEFENDANT'S RESPONSE AND
OPPOSITION TO PLAINTIFFS
MOTION AND MOTION
FOR PERMANENT INJUNCTION**

Date: March 28, 2008
Time: 10:30 am
Department: 6
Hon. Janis L. Sammartino

19
20
21 COMES NOW THE DEFENDANT SHAHROKH SAADAT-NEJAD and respectfully
22 submits this DEFENDANT'S RESPONSE AND OPPOSITION TO PLAINTIFFS MOTION
23 AND MOTION FOR PERMANENT INJUNCTION. This opposition is based on an ongoing
24 civil court case filed by plaintiff Pacific Law Center on January 12, 2007 civil case No.
25 GIC878352 and fraud. There is a trial date set for June 3, 2008 in the Superior Court of
26 California and there is also a motion for dismissal date of April 25, 2008 for the defendant.
27 Exhibits and court transcripts from the Superior Court of California will be submitted in this
28

1 court as exhibits (evidences) for this case.

2
3 Since this civil action is related to alleged actions by plaintiffs and defendant on the internet,
4 it is required and it is demanded by me for the court to have access to the World Wide Web
5 (Internet), before, during and after this court hearing. This demand has been denied by Judge
6 Larry Alan Burns and this demand has been opposed by the plaintiffs several times in California
7 Superior Court and in the U.S. Federal court. One of the reasons that I make this demand is
8 because I need to show that the plaintiffs have, and are continuing to file manufactured evidences
9 in and presenting to the courts.
10

11
12 A website by the name of archive.org is a nonprofit organization established to preserve Web
13 sites by taking regular "snapshots". The WayBack Machine provides links to older versions of a
14 webpage. Archive.org took a snapshot of pacificlawcenters.com on January 10, 2007, and on
15 there is proof at minimum that the plaintiffs were knowingly misleading the courts and they are
16 now covering it up.
17

18
19 On the Superior Court of California transcript of March 9, 2007 which is attached to my
20 March 26, 2007 filing of DECLARATION OF SHAHROKH SAADAT-NEJAD AND
21 RESPONSE TO ALL EX PARTE IN ALL COURT CASES LISTED ON THIS DOCUMENT
22 on page 6, line 24 - down to - Page 7, line 5 the Plaintiffs give the impression to the court that the
23 defendant is angry at the government for not allowing child pornography on the internet.
24

25 (Mr. Edward J. McIntyre from "Solomon Ward Seidenwurm and Smith)

26 **MR. MCINTYRE: "HE HAS PUBLICLY EXPRESSED HIMSELF ON ANY NUMBER**
27 **OF ISSUES, INCLUDING METHAMPHETAMINE, INCLUDING CHILD**
28 **PORNOGRAPHY, INCLUDING CHILD BONDAGE, AND MANY, MANY OTHERS.**
HE HAS THE RIGHT TO DO SO. HE IS UPSET ABOUT THE FBI AND THE EXTENT
OF ITS POWER."

1 Mr. Edward J. McIntyre and his associates told me that they will use this transcript to ruin me
2 if I do not follow their orders.
3

4 My websites and blogs give information on the dangers of Methamphetamine which is a
5 highly addictive central nervous system stimulant. Methamphetamine addicts are turn into sex
6 addicts, in a manner that spreads diseases. Children are a target at all times for sex. In the gay
7 communities (Gay Pride Parade) where the use of Methamphetamine is very high, there are
8 always person(s) that offer sex with children. As stated in my March 26, 2007 filing of
9
10 **DECLARATION OF SHAHROKH SAADAT-NEJAD AND RESPONSE TO ALL EX PARTE**
11 **IN ALL COURT CASES LISTED ON THIS DOCUMENT,** there are active Methamphetamine
12 dealers and pimps of child sex in San Diego, California whom even call themselves Pastors. On
13 my websites and blogs there is information of how these children are lured into the child sex
14 trade, which includes child slavery. I even have videos on my websites and blogs related to these
15 issues.
16
17

18 According to the plaintiffs declarations filed February 26, 2007 in the Superior Court of
19 California case Mr. Edward J. McIntyre and his associates make a living from defending persons
20 that are charged with sex abuse on children, and they state that on their declarations very proudly.
21 And then for Mr. Edward J. McIntyre and his associates to come and mislead in court, and in
22 order to create anger and hate, they the plaintiffs say in court "**HE HAS PUBLICLY**
23 **EXPRESSED HIMSELF ON ANY NUMBER OF ISSUES, INCLUDING**
24 **METHAMPHETAMINE, INCLUDING CHILD PORNOGRAPHY, INCLUDING CHILD**
25 **BONDAGE, AND MANY, MANY OTHERS. HE HAS THE RIGHT TO DO SO. HE IS**
26 **UPSET ABOUT THE FBI AND THE EXTENT OF ITS POWER"** Is very disturbing to me.
27
28

1 I am having nightmares of those meetings with the plaintiffs, just writing about it upsets me right
2 now in a manner that my body trembles and shakes. How can this behavior of Mr. Edward J.
3 McIntyre and his associates be accepted in any society? In my eyes what the plaintiffs Pacific
4 Law Center, and Solomon Ward Seidenwurm & Smith law firm have done is rape the children
5 that I have been writing about, or that are on videos and they have done it with no shame, and
6 they still are raping the children. It has come to my attention that another law firm that is highly
7 connected to the plaintiffs is making a living by defending alleged child slave masters, and child
8 sex abusers. The civil complaint was filed in the U.S. district court in Miami, Florida by the firm
9 Motley Rice LLC and private practice lawyer John Andres Thornton in 2007. Motley Rice is
10 described by Fortune magazine as "the most feared asbestos/tobacco/mass-torts plaintiffs' law
11 firm in the country (United States)." It won roughly \$250 billion from a settlement with the
12 tobacco industry in the 1990s. The law firm that is defending the accused is DLA Piper, which
13 has over 3600 active lawyers worldwide, and it has an office in San Diego, California just five
14 floors above the office of Solomon Ward Seidenwurm & Smith law firm. Now DLA Piper is
15 allegedly subcontracting the case to smaller law firms out of shame, instead of dumping the
16 clients, because they still want to make money. I will encourage on the World Wide Web for the
17 boycott of DLA Piper and any of its clients as a whole. If a company hires DLA Piper, I will ask
18 for a boycott of that company which will be posted on but not limited to on PHAWKU.com and
19 PHAWKU2.com with pride. IT IS SO ORDERED.

20
21
22
23
24
25 One can visit this website address

26 <http://web.archive.org/web/20070207025731/http://www.pacificlawcenters.com> and see for them
27 selves that the plaintiffs Pacific Law Center and Solomon Ward Seidenwurm & Smith did
28 mislead the court with the full intention of inflicting harm to me and my work, which I do not

1 profit from, and I never have.

2
3 Archive.org can and will prove that the plaintiffs are crooks, liars with full of hate towards
4 Muslim Iranians.

5
6 Archive.org can and will also prove at minimum that Pacific Law Center knowingly mislead
7 the government and the public that they have more lawyers than they really do.

8
9 On November 15, 2007 Plaintiffs filed for this civil case a PACIFIC LAW CENTER AND
10 SOLOMON WARD'S MEMORANDUM IN SUPPORT OF THEIR MOTION FOR
11 PERMANENT INJUNCTION. On page 6, line 21, the plaintiffs state that:

12 **...through a lawyer purporting to represent him, told Pacific Law Center that unless it**
13 **pays him \$500,000 he will continue to use its domain name.**

14
15 A lawyer by the name of **Mary Frances Prevost contacted me** on January 12, 2007 and said
16 that she will represent me for a civil action against Pacific Law Center for violating my civil
17 rights, and I agreed. **January 12, 2007** happens to be the same day that Pacific Law Center filed
18 a civil action against me at the Superior Court of California which was unknown to me. Mary
19 Frances Prevost told me that my case against Pacific Law Center is so solid that we may be able
20 to settle without filing a complaint by demanding a settlement in a letter. Little did I know that
21 Mary Frances Prevost was collaborating with at minimum Pacific Law Center. A copy of an
22 email from Mary Frances Prevost to me is attached to this document, labeled as **EXHIBIT 1**.

23
24
25
26 Before January 12, 2007 I had a meeting with Pacific Law Center, which was recorded on
27 tape. Mary Frances Prevost asked me for that tape on January 22, 2007 and to this day she still
28 has it, even though I have asked for her to return it several times. A copy of an email from Mary

1 Frances Prevost to me asking about the tape is attached to this document, labeled as **EXHIBIT 2**.

2
3 In my March 26, 2007 filing of DECLARATION OF SHAHROKH SAADAT-NEJAD AND
4 RESPONSE TO ALL EX PARTE IN ALL COURT CASES LISTED ON THIS DOCUMENT
5 there is substantial evidences that Mary Frances Prevost was setting me up for cyber squatting.
6 Mary Frances Prevost needs to be ordered to appear in this court regarding her full intentions,
7 and she needs to be ordered to bring to court my audio tape(s) so I may present my evidences.
8

9 A court order to yahoo.com would also be appropriate to provide to this court copies of all
10 emails coming in and going out from my previous email pacificlawcenters@yahoo.com just so
11 there is no allegations of tampering with emails.
12

13
14 On October 5, 2007 there was a default prove-up hearing for the Superior Court of California
15 case. Transcript of that hearing is attached to this document labeled as **EXHIBIT 3**.
16

17 On October 5, 2007 Superior Court of California court transcript Page 11, Line 10 to Line 18
18 the Judge ordered plaintiffs attorneys Mr. Edward J. McIntyre from Solomon Ward Seidenwurm
19 & Smith to provide Fed-Ex Tracking Numbers to prove that the plaintiffs have been notifying
20 me of all paper work that they have filed with the court.
21

22 **THE COURT:** IF YOU USE FED-EX, THERE WOULD BE TRACKING NUMBERS.

23 **MR. MCINTYRE:** THERE ARE. THERE SHOULD BE.

24 **THE COURT:** MAKE AN ARRANGEMENT WITH FED-EX THAT YOU OBTAIN THE
25 TRACKING NUMBERS, SO YOU WON'T HAVE A DISPUTE ABOUT THIS.

26 **MR. MCINTYRE:** ALL RIGHT, YOUR HONOR. WOULD YOU SET A HEARING DATE,
27 YOUR HONOR, FOR THE HEARING ON THE PERMANENT INJUNCTION?
28

I had told the court that I was not being notified by the plaintiff's council and the court of any

1 of the past hearings since late April of 2007 let alone October 5, 2007. I had found out about the
2 October 5, 2007 hearing by walking into court and checking the court computer in late
3 September of 2007.
4

5 On the October 5, 2007 Superior Court of California transcript on Page 10 – Lines 14 to 25:

6 **MR. SAADAT-NEJAD: NO PROBLEM, SIR. BUT THEY ARE JUST FILING**
7 **PAPERWORK SAYING, "YES, WE SERVED HIM." BUT THEY ARE NOT SERVING**
8 **ME. THESE ARE FALSE STATEMENTS THAT THEY ARE MAKING. I HAVE NO**
9 **REASON TO LIE ABOUT ANYTHING. ALL I WANT TO DO IS PRESENT MY**
10 **EVIDENCES TO THE COURT. PLEASE ORDER THEM TO SHOW THE TRACKING**
11 **NUMBERS FOR THESE PAPERWORKS THAT THEY SAY THEY HAVE SENT ME.**
THERE IS NO TRACKING NUMBER BECAUSE THERE NEVER WAS FED EX
PACKAGES SENT. PROVIDE THE TRACKING NUMBERS.

12 **MR. MCINTYRE: SO THE COURT MIGHT UNDERSTAND, I'M ALSO ACCUSED OF**
13 **HAVING JUDGE BURNS IN MY POCKET. JUDGE BURNS DENIED IT ON THE**
14 **RECORD. AS YOUR HONOR MIGHT GUESS, IT ISN'T TRUE. PUT THAT IN**
15 **CONTEXT.**

16 Mr. Edward J McIntyre from Solomon Ward Seidenwurm & Smith whom is the plaintiff's
17 council still has not provided the Fed-Ex Tracking Numbers to me or the court. At minimum the
18 plaintiffs and their counsel are in contempt of the court order which I will bring up on April 25,
19 2008.
20

21 On the October 5, 2007 Superior Court of California transcript on Page 7 – Line 1 – Mr.
22 Edward J McIntyre says:

23 **MR. MCINTYRE: HE DOESN'T GET A JURY TRIAL ON THAT ISSUE.**
24 **JUDGE BURNS MADE THAT PATENTLY CLEAR TO HIM. AND I THINK YOUR**
25 **HONOR CAN EQUALLY MAKE IT PATENTLY CLEAR TO HIM. THAT IS YOUR**
26 **JURISDICTION, AND YOURS ALONE.**
27
28

1 On the October 5, 2007 Superior Court of California transcript at minimum on Page 6 - Line
2 3 - the words SATELLITE and ANTENNA is missing.
3

4 On the October 5, 2007 Superior Court of California transcript at minimum on Page 4 - Line
5 8 - Down to Page 5 - Line 28 - seven domain names are missing. I am reading from a copy of
6 emails in my hands from my service provider godaddy.com and the court reporter has added a
7 domain name (pacificlawcenters.com) that is not written on the emails, but it makes the court
8 transcript look good for the plaintiffs. Copy of email from godaddy.com to me is attached to this
9 document labeled as **EXHIBIT 4**.
10
11

12 I am asking this court to give a court order to godaddy.com to provide the court and I of all
13 copies of anything that the plaintiffs, their counsel and any third party has provided to
14 godaddy.com regarding any and all of my websites, and court cases. Godaddy.com has made it
15 clear that they will not give me back my domain names and services and my contents unless they
16 get a court order.
17

18
19 There never was a court order for godaddy.com to shut, or suspend any of my domains. I
20 believe that the plaintiffs have manufactured their own court order and forged a Judges signature
21 either by hand or a rubber stamp.
22

23 The plaintiffs constantly bring up Judge Larry Alan Burns name in the Superior Court of
24 California case, and the plaintiffs have constantly brought up Judge Richard E.L Strauss's name
25 in the U.S. District Court case. These are all part of their ongoing psychological games of they
26 can turn a judge against their opponent. On the plaintiffs **REPLY IN SUPPORT OF PACIFIC**
27 **LAW CENTER AND SOLOMON WARD SEIDENWURM & SMITH, LLP'S EX PARTE**
28

1 APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW
2 CAUSE FOR A PRELIMINARY INJUNCTION which was filed on March 27, 2007 – Docket
3 number 8, the plaintiffs wrote:

4 **Shahrokh Saadat-Nejad is angry. He is angry at the government, state and federal. He is**
5 **angry at the judiciary, in particular Judge Strauss. He is angry at Mary Prevost and**
6 **Gregory Harvey.**

7
8 One reason that the plaintiffs wrote that I am angry at so many including the government is
9 that they were hoping for a terrorist act. A attorney for Pacific Law Center named Matthew Lee
10 Spiegel and another person that was with him but he refused to identify himself have told me at
11 the office of "Solomon Ward Seidenwurm & Smith" statements related to me being a martyr and
12 they used the words suicide bomber. I thought that it was a sick joke until I remembered the
13 same style of persuasion under the same style of circumstances from the past. Both Matthew Lee
14 Spiegel and his friend had a Jewish cap on their head (Kippot) and they had strings hanging
15 down their waists (Gartels). Matthew Lee Spiegel had his hair colored blonde and he had a new
16 hair design, curly. Matthew Lee Spiegel also had color contact lenses in his eyes colored blue.

17
18
19
20 Zionist terrorists and alike linked to AIPAC Terrorist Organization and alike have always
21 been believed are behind most if not all suicide bombers. I highly believe that Zionist terrorists
22 use at minimum blackmail and psychological tactics to persuade persons to commit suicide by
23 blowing them selves up. This tactic has been planed on me too many times for me to think
24 otherwise.

25
26 San Diego County Criminal Case No.CD200499 and M897962.

27
28 On July 25, 2006 San Diego Police took away my Passport, and \$9800.00 cash.

1 On July 25, 2006 I was arrested and booked into the Central Jail in San Diego, California.
2 After I was fingerprinted and before I was to exchange my street clothes for jail clothes, I was
3 interrogated by a high ranking San Diego County Deputy Sheriff regarding the horrible events of
4 September 11, 2001, my website USHOSTAGE.com, about my close to \$10,000 cash, why I
5 have not become a American Citizen, the events of what took place on July 25, 2006, medical
6 marijuana, active terrorist group agents of Mossad, Mojahedin-e-Khalq, Sipah-e-Sahaba Pakistan,
7 Millat-e-Islamia and even how I felt about Prophet Jesus.
8

9
10 For about 9 months the San Diego County Sheriff's Office denied such interrogation. On
11 March 26, 2007 I filed a declaration with the Computer IP Address of (206-190-25-
12 2.gen.twtelecom.net) that was used to visit my website USHOSTAGE.com by the San Diego
13 County Sheriff's computer from the Jail on July 25, 2006 and July 26, 2006 along with a IP
14 Address of the computer that visited my website in the same time frame
15 (81.199.145.58.ipplanet.com) which is from Israel (Occupied Land). The Judge for criminal
16 case numbers CD200499 and M897962 denied that I had filed this declaration, which I did get a
17 stamped copy from the court(s) when I filed.
18
19

20
21 August 30, 2006 Called Pacific Law Center from jail.

22
23 August 31, 2006 Pacific Law Center became council on record.

24
25 September 8, 2006 Fired Pacific Law Center by phone from jail because of lack of
26 communication and council service.

27
28 September 11, 2006 Pacific Law Center refused to acknowledge of being fired and came to
jail - I refused to see them.

1 September 12, 2006 Interrogated by San Diego Sheriff Deputy(s) about my criminal charges,
2 Terrorism, 9/11 and my website USHOSTAGE.com

3
4 September 18, 2006 Taken from jail to court - Was not taken into the court room - No
5 information given to me.

6
7 September 19, 2006 Posted Self Bail Cash.

8
9 September 21, 2006 Went and looked at court file - Discovered Pacific Law Center went to
10 court on September 18, 2006 and waived my rights to appear in court and got a continuance - I
11 did a walk in on court calendar 9/21/06 and told Judge Pacific Law Center has committed crimes
12 against me - Took Pacific Law Center off case.

13
14 November 20, 2006 Pacific Law Center tried to buy me in court.

15
16 December 15, 2006 received a very disturbing phone call regarding pacificlawcenters.com

17
18 January 26, 2007 Pacific Law Center went to my father's house in San Diego, California and
19 harassed him and others that were there. Short time later Pacific Law Center [License Plate No.
20 5GJM708] went back to my father's house with the San Diego Police Department. I do not live
21 with my father, which is a fact that Pacific Law Center knows. What lies did Pacific Law Center
22 tell the San Diego Police Department for them to go to my father's house with Pacific Law
23 Center in a very short notice? San Diego Police Department is very short on officers and it is not
24 fair to say lies about a person(s) in order for the Police to show up, or does Pacific Law Center
25 have an influence on the San Diego Police Department? My father has a very bad heart condition,
26 and this kind of harassment with the police may justify a civil complaint from my father against
27
28

1 Pacific Law Center.

2
3 My father's wife was so shaken up by Pacific Law Center harassing her at her home with the
4 San Diego Police Department that she was still shaken up by the whole thing a day later.
5

6 On March 28, 2007 the San Diego District Attorney Office recognized in court that the San
7 Diego Police Department has my Passport, and my \$9800.00 cash, so I made a deal with the San
8 Diego District Attorneys Office and that deal was recognized by the court, and the court gave a
9 order to the San Diego Police Department to return to me my Passport, and cash. When I went to
10 get my Passport and Cash, the San Diego Police Department said that they do not have my
11 Passport or cash, but another law agency does but they don't know who.
12
13

14 On April 20, 2007 Judge Richard E. L. Strauss gave his final order for in his department, but
15 the deputy court clerk Lydia Johnson made her own order to benefit the plaintiffs.
16

17 On or around September 21, 2007 I received mail from the court. I did not go to look at the
18 mail because I knew that whatever it was, it would be on court file, so I went to court to find out
19 and I discovered that there is a DEFAULT- PROOF UP ON HEARING set for October 5, 2007
20 and that this hearing was originally set for September 14, 2007 which I was not notified of by
21 plaintiff or the court. For some odd reason the court continued it to October 5, 2007. The mail I
22 received on or around September 21, 2007 from the court had nothing to do with this case or any
23 criminal case.
24

25
26 On December 17, 2007 I was notified by Fed-Ex that the plaintiffs have filed for a withdrawal
27 of Permanent Injunction Hearing.
28

On December 17, 2007 a CIVIL CASE MANAGEMENT CONFERENCE was entered in the

1 court and scheduled for January 11, 2007. The plaintiffs and the court did not notify me of this
2 new court date. Melisa Wong-Jimenez filed a declaration signed and dated on December 17,
3 2007 that I have been notified by mail.
4

5 On December 18, 2007 I went to court on the second floor and found out that a CIVIL CASE
6 MANAGEMENT CONFERENCE is set for January 11, 2008. I must file papers within 15 days
7 before January 11, 2008, so that would mean that I must file by December 20, 2007 because
8 weekends and holidays do not count. Christmas and New Years Day do not count because court
9 is closed as well as weekends.
10

11
12 Assuming that the court did send me a notice on December 17, 2007 which they did not nor
13 did the plaintiffs council, I would have received the notice on December 18, 2007 at the earliest.
14 I would only have had 2 days to prepare and file my papers. If I would have missed the deadline
15 and or not appear in court on January 11, 2008 then the case would have been closed in favor of
16 the Plaintiffs.
17

18
19 Technically I busted the court of collaborating with the plaintiffs to cover up fraud again. On
20 February 27, 2007 I was not in court, but the court and the plaintiffs say that I was. The court and
21 the plaintiffs say that I was in court and I did not want to sign the sign in sheet, and that I did not
22 want the hearing on court record, and that I did not want a court reporter. Who makes the rules? I
23 have a video of Knox Services going to my father's house to serve the court order of February 27,
24 2007 which they all say that I was in court for. Why would they serve it if I was in court?
25 Attached to this document is copy of the Superior Court of California sign in sheet for February
26 27, 2007 labeled as **EXHIBIT 5**.
27
28

1 On December 19, 2007 Eva Oemick whom is the court reporter for Judge Larry Alan Burns in
2 the U.S. District Court which is across the street from the Superior Court of California called me
3 from (619) 615-3103 on my cell phone on or around 10:35 am. I answered the phone but Eva
4 Oemick hung up her phone without saying anything. Less than an hour later on or around 11:27
5 am on December 19, 2007 Melisa Wong-Jimenez called me from (619) 531-1168 on my cell
6 phone and told me that a new date has been set to February 29, 2008 and it has been entered on
7 the court computer. On December 20, 2007 the court and Melisa Wong-Jimenez changed the
8 entry date on government court computers from December 19, 2007 to December 20, 2007.
9 Melisa Wong-Jimenez and the court have been changing anything that they desire on the
10 government court computers in order to only cover up corruptions by the government and the
11 plaintiffs and the plaintiffs council whom are AIPAC Terrorist Attorneys.
12
13
14

15 On December 19, 2007 in retaliation from the government, San Diego Police Department
16 Impounded my vehicle. I believe the phone call that came in from Eva Oemick on December 19,
17 2007 was a sick sign that they the government are saying that we can do whatever we want
18 (Judge Larry Alan Burns). All I can do is write about it. A revenge reaction resulting in terrorism
19 and or suicide they the government will never ever get from me.
20
21

22 In the Superior Court of California court transcript of March 9, 2007 hearing on (Page 17,
23 Line 27 down to Page 18, Line 7) the plaintiff's counsel's statements also confirms that I was not
24 present in court on February 27, 2007.
25

26 **MR. MCINTYRE:** WELL, I WILL SAY THIS FOR MR. SAADAT-NEJAD. APPARENTLY,
27 ONCE HE BECAME AWARE OF THE COURT'S TEMPORARY RESTRAINING ORDER,
28 HE HAS BLACKED OUT HIS PACIFICLAWCENTERS SITE. YOUR HONOR MAY HAVE
ALREADY TRIED IT. IF ONE --

THE COURT: NO.

1 **MR. MCINTYRE: IF ONE GOES AND TRIES TO LOG ON, ALL YOU GET IS A BLACK**
2 **PAGE. I COMMEND HIM FOR THAT. THAT WAS THE COURT'S ORDER.**
3 **THE COURT: OKAY.**

4
5 On February 27, 2007 I had posted several times on craigslist.org website and at the time of
6 8:56am I had posted an ad from a computer IP address (land line) which is located over 10 miles
7 away from the court in Downtown. The alleged hearing was at 9:00am. Attached to this
8 document is copies of emails I received from craigslist.com labeled as **EXHIBIT 6.**
9

10 **EXHIBIT 6** has copies of a emails from craigslist.org. **EXHIBIT 6**, page 1 has a date on top
11 of the email that states Wed, 28 Feb 2007 14:55:23 UT - UT stands for Universal Time, which is
12 8 hours ahead of California (PST) Time. On the bottom of the email it states that the posting that
13 was flagged and removed is from 2007-2-27 16:56:26 (February 27, 2007 at 8:56 and 26 seconds
14 am) That would give me 3 minutes and 34 seconds to allegedly make it to court which is over 10
15 miles away. The alleged hearing was set for 9:00am(pst) - See **EXHIBIT 5** for time of alleged
16 hearing.
17

18
19 On March 9, 2007 which was the first court appearance I made regarding this civil case, the
20 plaintiffs give the impression (Page 11, Line 26 - Down to Page 12, Line 13) to the court that
21 they did not have my telephone number.
22

23
24 On the court transcript of March 9, 2007 on page 6, line 24 - down to - Page 7, line 5 the
25 Plaintiffs give the impression to the court that the defendant is angry at the government for not
26 allowing child pornography on the internet.
27

28 (Mr. Edward J. McIntyre from "Solomon Ward Seidenwurm and Smith Law Firm)

"HE HAS PUBLICLY EXPRESSED

1 **HIMSELF ON ANY NUMBER OF ISSUES, INCLUDING METHAMPHETAMINE,**
2 **INCLUDING CHILD PORNOGRAPHY, INCLUDING CHILD BONDAGE, AND MANY,**
3 **MANY OTHERS. HE HAS THE RIGHT TO DO SO. HE IS UPSET ABOUT THE**
4 **FBI AND THE EXTENT OF ITS POWER."**

5
6 Mr. Edward J. McIntyre and his associates told me that they will use this transcript to ruin me
7 if I do not follow their orders. **Suicide.**

8
9 On July 23, 2007 ACLU filed an AMICUS CURIAE – Docket number 46 – and on that same
10 day Pacific Law Center made an Amendment on their information filed with the California
11 Secretary of State Debra Bowen. Mr. Jeffrey L. Phillips had himself listed as the agent for
12 Pacific Law Center and Mr. Jeffrey L. Phillips was allegedly residing at 4025 Bayard Street, San
13 Diego, California 92109.

14
15
16 The plaintiffs did not fear the local, state and federal government, of finding out the truth but
17 they did fear the ACLU. I got this information on November 8, 2007. I immediately posted it on
18 the World Wide Web (Internet) and the plaintiffs immediately the next day filed a NOTICE OF
19 CONTINUANCE OF PACIFIC LAW CENTER'S MOTION FOR PERMANENT
20 INJUNCTION for the Superior Court of California case, which followed with a NOTICE OF
21 WITHDRAWAL OF PACIFIC LAW CENTER'S MOTION FOR PERMANENT
22 INJUNCTION. See attached documents labeled as **EXHIBIT 7.**

23
24
25 At minimum since March 24, 2003 Mr. Jeffrey L. Phillips whom is the owner of Pacific Law
26 Center and the client of Solomon Ward Seidenwurm & Smith has been claiming that he is a
27 California attorney, but he is not, and he still is not because he and his associates keep failing the
28

1 California Bar Exam – yes there are more than one fake attorneys listed with Pacific Law Center.
2 Archive.org can and will prove it. This is another reason that I demand the World Wide Web in
3 the court, so I may show the court and the people. The plaintiffs have been erasing any and all
4 websites that can prove that they the plaintiffs have fake attorneys. I have captured those website
5 pages and have them stored away. Copies of FindLaw.com with web addresses are attached to
6 this document as **EXHIBIT 8**.
7

8
9 At minimum Mr. Jeffrey L. Phillips, Mr. John A. Schill, and a Mr. Barry S. Wagner listed
10 them selves at minimum on their website pacificlawcenter.com and FindLaw.com as licensed
11 California attorneys. I had told this to Judge Larry Alan Burns in court, but it is not in the court
12 transcript. What is in the court transcript that was related to this issue is that I had asked Judge
13 Burns “Why then are they offering me money?” His answer was “I don’t know.”
14

15 I Shahrokh Saadat-Nejad refuse to sell myself to corruption.
16

17 I had filed the same information in the Superior Court of California on February 6, 2008 as an
18 attachment to a CASE MANAGEMENT STATEMENT. I put all the paperwork in Department
19 75 Box like I was told to do with a date and time stamp, but the court has yet to file it in the court
20 file for the record. But what the plaintiffs did file the very next day was a SUBSTITUTION OF
21 ATTORNEY. Copy of SUBSTITUTION OF ATTORNEY from the California Superior Court
22 case is attached to this document as **EXHIBIT 9**. Mr. Edward J. McIntyre from Solomon Ward
23 Seidenwurm & Smith law firm allegedly signed it on Super Bowl Sunday February 3, 2008. But
24 he still is the plaintiffs counsel for the federal case. I bet he will drop out of this U.S. district
25 court case after I file this document. If he does, I ask the court to order him to appear.
26
27
28

On March 13, 2007 the plaintiffs Pacific Law Center and Solomon Ward Seidenwurm &

1 Smith filed a PACIFIC LAW CENTER'S EX PARTE APPLICATION FOR AN ORDER TO
2 SHOW CAUSE RE CONTEMPT AND SOLOMON WARD'S EX PARTE APPLICATION
3 FOR A TEMPORARY RESTRAINING ORDER in the Superior Court of California case.

4 Attached to this document is a copy of PACIFIC LAW CENTER'S EX PARTE APPLICATION
5 FOR AN ORDER TO SHOW CAUSE RE CONTEMPT AND SOLOMON WARD'S EX
6 PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER labeled as **EXHIBIT**
7

8 **10.** On the page 2, line 3, you will see the typical riddle and poetry of Mr. Edward J. McIntyre as
9 his introduction. On page 2 again you, line 16 you will see that the plaintiffs are complaining that
10

11 I am writing about Pacific Law Center on postings of craigslist.com which is a nonprofit website,
12 as far as I know. This is proof that the plaintiffs goal is and has been to violate my freedom of
13 expression and speech. On the same document again on page 2, lines 20 to 25, the plaintiffs
14 wrote:

15 **RELIEF SOUGHT – Solomon Ward seeks a temporary restraining order and eventually a**
16 **preliminary and permanent injunction barring Saadat-Nejad from using Solomon Ward**
17 **Seidenwurm & Smith, Solomon Ward or the name of any attorney in that firm in anything**
18 **other than papers that he files in this court or in federal court.**

19 The above is another proof that the plaintiffs goal is and has been to violate my freedom of
20 expression and speech. On that document it also has the name of an attorney that works for
21 Solomon Ward Seidenwurm & Smith law firm. The name of the attorney is CHRISTINA

22 MARIE MILLIGAN whom now works for the government. Convenience for corruption.
23 Christina Marie Milligan was involved with the phony court order of February 27, 2007.
24

25 Defendant respectfully asks the court in the interest of Justice and the people to issue a
26 preliminary injunction on Pacific Law Center and its attorneys in the State of California, Phillips
27 and Associates Law Firm and its attorneys in the State of Arizona, Solomon Ward Seidenwurm
28 & Smith Law Firm and its attorneys in the State of California, and attorney Mary Frances

1 Prevost in the State of California to halt their law practice, which would include halting all
2 advertisement and taking in new clients until this issue of at minimum fraud is resolved. My
3 liberty has been violated at minimum due to this fraud. This court has the power to protect the
4 people from this form of fraud without a lawsuit being filed.
5

6 Defendant respectfully asks the court to order the Department of Justice to investigate the
7 plaintiffs and their alleged accomplices regarding fraud.
8

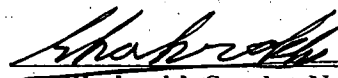
9 Defendant also respectfully asks the court to order the FBI to investigate the plaintiffs for hate
10 crimes, and for attempts of creating terrorism, which includes suicide bombers.
11

12 Defendant also respectfully asks the court to order the FBI and the Department of Justice to
13 investigate violations of my civil rights.
14

15 Defendant also respectfully asks the court to give a court order to godaddy.com to return my
16 all of my domain names and to refrain from taking such actions unless a court orders them
17 directly.
18

19 Defendant respectfully asks the court to forgive my writing skills. I am very upset about these
20 Zionist terrorists of trying to get me to behave like a terrorist. I am a bit relieved that it is going
21 on a public record, which in this case it is a U.S. district court. This document will be posted on
22 the World Wide Web (Internet). **DLA Piper, here I come!**
23
24

25
26 Date: MARCH 11, 2008

27 
28 **Shahrokh Saadat-Nejad**
Defendant



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FROM \$14.⁹⁹/MONTH



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Folders [Add - Edit]

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Bulk (1) [Empty]

Trash [Empty]

This message is not flagged. [Flag Message - Mark as Unread] Printable View

From: Impd2rq@aol.com Add to Address Book Add Mobile Alert

Date: Fri, 12 Jan 2007 19:57:33 EST

Subject: Address

To: pacificlawcenters@yahoo.com

CC: Impd2rq@aol.com

Search Shortcuts

My Photos

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Hello:

My address is below:

555 West Beech Street, Ste. 500
San Diego, CA 92101

It is in the corner of West Beech and India Street. I rent my space from the Law Offices of Greco and Traficante. When you come out of the elevator, please take a left and go into Greco & Traficante. Ask for me, and I will come out and get you.



See your credit score - free



Find Any Email Address



\$200K loan as low as \$771/mo.*



Find Any Email Address

Sincerely,
MARY FRANCES PREVOST
555 West Beech Street
Suite 500
(619) 692-9001
Impd2rq@aol.com
www.acrimedefenseattorney.com

"SOME MEN SEE THINGS AS THEY ARE AND SAY 'WHY'? I DREAM OF THINGS THAT NEVER WERE AND SAY 'WHY NOT'?" (from Edward Kennedy's eulogy of his brother, Bobby).

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EXHIBIT 1 - PAGE 1

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Get AT&T Yahoo! High Speed Internet

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Trash [Empty]

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From: Impd2rq@aol.com [Add to Address Book](#) [Add Mobile Alert](#)

Date: Mon, 22 Jan 2007 23:38:02 EST

Subject: Re: Pacific Law Center

To: pacificlawcenters@yahoo.com

Search Shortcuts

My Photos

My Attachments

P.S., do you have a copy of the tape from your meeting? I need it.

Mary

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CA Credit Score
667 Yours is \$0

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EXHIBIT 2 - PAGE 1

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This is how it sh
WEST
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- Inbox (18)
- Draft
- Sent
- Bulk (1) [Empty]
- Trash [Empty]


This message is not flagged. [Flag Message - Mark as Unread] Printable View

From: Impd2rq@aol.com  Add to Address Book  Add Mobile Alert
Date: Wed, 24 Jan 2007 19:44:41 EST
Subject: Re: Pacific Law Center
To: pacificlawcenters@yahoo.com
CC: Impd2rq@aol.com


Search Shortcuts

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Shahrokh:

 CA Credit Score
667 Yours is \$0


I'm confused. I am on the way to the hospital to pick up my dog, and I see this very confusing email from you. What's happened? Marisela told me when you came to view the complaint, that you decided you wanted to take on and destroy Pacific Law Center, go the whole way including trial, and that you were very upset.

 Earn a degree
In 1 yr

I realize you are, but what has caused this decision? Is it that I didn't leave my dog to die at home and call you over the past two days? Or perhaps I was in court? You have to understand that different cases get priority when priority is needed for that case. I had every intention of discussing this with you over the weekend, when I could not be interrupted by telephones or other clients.

 5.5% 30yr Fix
Good credit refi

Why would you take a loss when you very well may have a nice settlement coming your way? I don;t understand why you want to give up the fight.

 Find Any
Email Address

Please talk to me!

Mary Frances Prevost

In a message dated 1/24/2007 4:11:53 P.M. Pacific Standard Time, pacificlawcenters@yahoo.com writes:

Hi Mary,
I know you are very busy, but right now I have to think of me.

EXHIBIT 2 - PAGE 2

I have been waiting for your phone call for almost three days now, and I must give up waiting. At \$350 an hour that I signed maybe adding up to a point where I can be controlled. I have to take my loss and move on. I had to unplug my buy online ticket service.

Please STOP all work on this matter and send me a bill. I will be back in San Diego after the NFL Super Bowl in Miami. The latest that you will have your money is on or around February 11, 2007. (It should be around 4:00pm on 2/11/07) Is that OK? It is only three weeks away.

I think I will handle what Pacific Law Center did to me outside of the country or look for other avenues. There seems to be too much corruption in the Justice system here in the United States.

Shahrokh Saadat-Nejad
(646) 225-8213

Please Mail the bill and tape to:
Shahrokh Saadat-Nejad
3713 Mount Ashmun Place
San Diego, California 92111

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From: Impd2rq@aol.com [Add to Address Book](#) [Add Mobile Alert](#)

Date: Thu, 25 Jan 2007 00:21:46 EST

Subject: Re: Pacific Law Center

To: pacificlawcenters@yahoo.com

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I won't do anything for now. But think about us getting a demand letter out to them at least. Just think about it. (:

Mary

CA Credit Score 667 See Yours

In a message dated 1/24/2007 9:12:29 P.M. Pacific Standard Time, pacificlawcenters@yahoo.com writes:

Earn a degree In 1 yr

Hi Mary,

5.5% 30yr Fix Good credit refi

It is not because of you. I think you and your team are angels. But I am too confused right now. I hired a lawyer 5 weeks ago (Gary) and he has not filed anything for me, but he did take my money. I feel that I been ripped off again. Then I think about the contract I signed with you at \$350 per hour, it freaks me out.

Degrees in as fast as 1 year.

Sorry for the change of mind.

Lawyers confuse the heck out of me.

Shahrokh Saadat-Nejad

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EXHIBIT 2 - PAGE 4

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Earn a degree
In less than 1 yr.

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Draft	
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See your credit score - free

Earn a degree In 1 yr

Good Credit? 30-yr rate 5.5%*

Find Any Email Address

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From: Impd2rq@aol.com Add to Address Book Add Mobile Alert

Date: Sat, 27 Jan 2007 12:49:23 EST

Subject: Re: Bill & Tape

To: pacificlawcenters@yahoo.com

CC: Impd2rq@aol.com, mjh_crimlaw@yahoo.com

Hi: Yes I will get that out on Monday. But what are you going to do? They have a suit against you, and you have a solid issue against them. What if you get served? Are you going to let it go into default? Will you let them get a judgment against you? I still suggest getting out a demand letter to globally resolve the whole thing.

I think a report to the state bar is warranted. Do you want me to file one? I don;t charge for that, by the way. It would be an honor and pleasure to let the state bar know what's going on. These dumptrucks are killing my business!

Go to Miami. Nothing is going to happen here while you are gone that can't be taken care of upon your return.

Mary

In a message dated 1/26/2007 2:45:17 P.M. Pacific Standard Time, pacificlawcenters@yahoo.com writes:

Hi Mary,

Could you please email and mail me a bill. Please mail the tape too. (I need it)

Pacific Law Center server with an attorney went to my fathers house today and tried to serve him. My father refused. Pacific Law Center

EXHIBIT 2 - PAGE 5

server with a attorney went back to my fathers house with the San Diego Police minutes later.

Gary told me that my criminal case is looking like intentional foul play from the DA and Court.

Pacific Law Center may become co-defendants. I still want to file.

I may skip Miami.

Mail To:
Shahrokh Saadat-Nejad
3713 Mount Ashmun Place
San Diego, Ca 92111
pacificlawcenters@yahoo.com

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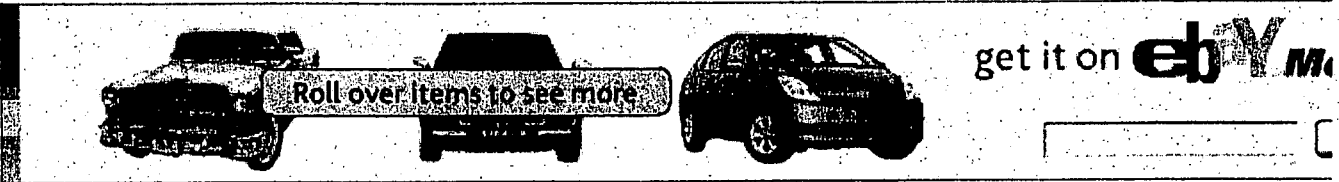
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EXHIBIT 2 - PAGE 6

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[Call or Instant Message](#) mjh_c

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 - Draft
 - Sent
 - Bulk (1)** [\[Empty\]](#)
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Date: Thu, 1 Feb 2007 12:15:32 -0800 (PST)

From: "Marisela J. Hernandez" <mjh_crimlaw@yahoo.com> [Add to Address Book](#)
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Subject: Enclosed Please Find..

To: pacificlawcenters@yahoo.com

- Search Shortcuts**
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Shahrok,

Enclosed please find the Demand Letter that was mailed to Pacific Law Center this afternoon.

Please Give us a Call if You have any Questions.

- CA Credit Score
667 See Yours
- Earn a degree
In 1 yr
- Bad Credit
Refinance Rates
- Find Any
Email Address

Thank You

Marisela J. Hernandez
 Paralegal to Mary F. Prevost
 555 West Beech Street, Suite 500
 San Diego, CA 92101
 Tel. (619) 692-9001
 Fax. (619) 255-0726
www.acrimedefenseattorney.com

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Attachments Attachment scanning provided by:

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EXHIBIT 2 - PAGE 7

MARY FRANCES PRÉVOST

ATTORNEY AT LAW

*National Association of Criminal Defense Lawyers * Board of Directors: San Diego Criminal Defense Bar Association (1997-2004) * National College for DUI Defense * California Attorneys for Criminal Justice * California Public Defender's Association * California DUI Defense Lawyers Association * North County Criminal Defense Bar Association * Consumer Attorneys of San Diego * American Inns of Court * Federal Bar Association * International Criminal Defence Attorneys Association * American Trial Lawyers Association*
February 1, 2007

Thomas W. Slattery
Pacific Law Center, P.C.
4225 Executive Square, Suite 1550
La Jolla, California 92037

Robert Arentz
Phillips & Associates, P.C.
3030 North 3rd Street, Suite 1100
Phoenix, Arizona 85012-3049

Re: Shahrokh Saadatnejad

Dear Messrs. Slattery & Arentz:

This letter is a request for a global pre-filing settlement of Mr. Saadatnejad's malpractice case against Pacific Law Center, Thomas Slattery and Matthew Spiegel. As you are aware, Mr. Saadatnejad's constitutional rights were violated when Pacific Law Center appeared on his behalf in court after your firm was fired, and waived his constitutional right to be present in the courtroom as well as waived his speedy trial rights without his permission.

As you are aware, Mr. Saadatnejad has been broadcasting this very clear malpractice across the internet via his own website, as well as posting warnings on numerous other message boards. He intends to continue doing so.

Ultimately, a junior attorney in your office, Matthew Spiegel, filed a complaint for injunctive relief and damages in the Superior Court identifying how Mr. Saadatnejad's actions have cost Pacific Law Center clients.

As you know, or should know, Pacific Law Center is a public figure pursuant to the New York Times versus Sullivan rule and, as such, even if an injunction were granted by Judge Strauss, Mr. Saadatnejad may still proceed for the rest of his life to post his very valid complaints warning other citizens to beware of Pacific Law Center. In any event, I do not believe an injunction would be granted. And certainly any loss claimed by Pacific Law Center is as a result of the malpractice of Pacific Law Center. Mr. Saadatnejad simply made that malpractice very public.

ORANGE COUNTY
1500 QUAIL STREET, STE. 550
NEWPORT BEACH, CALIFORNIA 92618
TELE: (866) 464-6662

LOS ANGELES
468 NORTH CAMDEN DRIVE
BEVERLY HILLS, CALIFORNIA 90210
TELE: (866) 464-6662
E-MAIL: IMPD2@GMAIL.COM

SAN DIEGO
555 W. BEECH STREET, STE. 500
SAN DIEGO, CALIFORNIA 92101
TELE: (619) 692-9001

WEBSITE: [HTTP://ACRIMEDFENSEATTORNEY.COM](http://ACRIMEDFENSEATTORNEY.COM)
FAX: (619) 255-0726

EXHIBIT 2 - PAGE 8
EXHIBIT 1

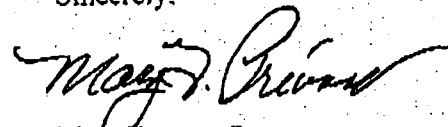
However, in an attempt to globally settle Mr. Saadatnejad's Complaint for Malpractice prior to filing, I suggest the following:

Pacific Law Center, P.C. pay Mr. Saadatnejad \$500,000 in damages. In return, Mr. Saadatnejad will sign over all domain names in his possession related to or referring to Pacific Law Center. Mr. Saadatnejad will cease and desist, and will sign the appropriate documents to that effect, from further posting the story of Pacific Law Center's malpractice on any site on the internet, or broadcasting in any way or through any medium and comments pertaining or relating to his association with Pacific Law Center. Pacific Law Center will dismiss its complaint for injunctive relief and damages with prejudice.

This offer remains outstanding until 5 p.m. on Thursday, February 15, 2007. Thereafter, if our global settlement rejected, I will file a Complaint for malpractice against Pacific Law Center, Thomas Slattery and Matthew Spiegel, and immediately schedule depositions. The lawsuit, I suspect, will become a very public matter.

I look forward to your speedy reply.

Sincerely,



Mary Frances Prevost

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO

DEPARTMENT 75

HON. RICHARD E.L. STRAUSS,

PACIFIC LAW CENTER,
A PROFESSIONAL CORPORATION,

PLAINTIFF,

VS.

SHAROKH SAADATNEJAD,
INDIVIDUALLY AND DOING BUSINESS AS
PACIFICLAWCENTERS.COM AND
USHOSTAGE.COM; AND DOES 1 THROUGH 50,
INCLUSIVE,

DEFENDANTS.

CASE NO. GIC 878

REPORTER'S TRANSCRIPT OF PROCEEDINGS

OCTOBER 5, 2007

APPEARANCES:

FOR THE PLAINTIFF:

EDWARD J. MCINTYRE, ESQ.
SOLOMON, WARD, SEIDENWURM & S.
401 B STREET, SUITE 1200
SAN DIEGO, CALIFORNIA 92101

FOR THE DEFENDANTS:

IN PRO PER

REPORTED BY:

JAMES PARTRIDGE, CSR NO. 6226
OFFICIAL REPORTER
330 WEST BROADWAY
SAN DIEGO, CALIFORNIA 92101

3 --000--

4 THE COURT: GOOD MORNING.

5 MR. MCINTYRE: GOOD MORNING, YOUR HONOR.

6 MR. SAADAT-NEJAD: GOOD MORNING, YOUR HONOR.

7 THE COURT: EVERYBODY'S APPEARANCE FOR THE RECORD,
8 PLEASE.

9 MR. MCINTYRE: GOOD MORNING, YOUR HONOR. EDWARD MCINTY
10 ON BEHALF OF PACIFIC LAW CENTER. WITH ME IS MR. SLATTERY, THE
11 SUPERVISING ATTORNEY AT PACIFIC LAW CENTER.

12 MR. SLATTERY: GOOD MORNING, YOUR HONOR.

13 MR. SAADAT-NEJAD: GOOD MORNING, YOUR HONOR. SHAROKH
14 SAADAT-NEJAD. I AM THE DEFENDANT FOR THIS MATTER.

15 THE COURT: OKAY. THIS IS ON FOR A DEFAULT PROVE-UP
16 HEARING. WHAT'S THE SITUATION?

17 MR. MCINTYRE: DEFAULT JUDGMENT WAS ENTERED BY THE COURT
18 ON APRIL 16TH OF THIS YEAR, AND THE COURT WANTED THE PROVE-UP BY
19 LIVE APPEARANCE, RATHER THAN JUST DOING IT ON THE PAPERWORK.
20 I'M PREPARED TO GO FORWARD ON THAT, YOUR HONOR.

21 THE COURT: ALL RIGHT.

22 MR. MCINTYRE: LET ME TELL YOU WHAT I HAVE FOR THE COURT.
23 YOU ENTERED A PRELIMINARY INJUNCTION, AND ONE OF THE THINGS I
24 WANTED IN THE JUDGMENT IS A PERMANENT INJUNCTION THAT PUTS --
25 THIS IS REALLY THE END OF THE LINE OF THIS CASE. THERE IS, AS
26 YOU KNOW, A PARALLEL CASE IN FEDERAL COURT. YOU ENTERED A
27 PRELIMINARY INJUNCTION, AS DID THE FEDERAL COURT.

28 MR. SAADAT-NEJAD SAW FIT TO VIOLATE JUDGE BURNS' ORDER. THERE
WAS A HEARING ON CONTEMPT. JUDGE BURNS FOUND CONTEMPT BY CLEAR

1 AND CONVINCING EVIDENCE, AND PUT MR. SAADAT-NEJAD IN CUSTODY FOR
2 13 DAYS. I HAVE, AND I'D ASK THE COURT TO TAKE JUDICIAL NOTICE
3 OF IT, JUDGE BURNS' ORDER FINDING HIM IN CONTEMPT AND PUTTING
4 HIM IN CUSTODY.

5 I'M ALSO GOING TO ASK THE COURT TO MAKE A FINDING
6 UNDER 15 U.S.C. 1117, I BELIEVE, THAT THIS IS AN EXCEPTIONAL
7 CASE, SO THAT MY CLIENT IS ENTITLED TO ITS ATTORNEYS' FEES AS
8 PART OF THE JUDGMENT. AND I HAVE A DECLARATION, WHICH SHOULD BE
9 IN THE COURT FILE, BUT I HAVE AN EXTRA COPY FOR THE COURT.

10 THE COURT: I READ IT.

11 MR. MCINTYRE: OKAY. WHICH UNDERSCORES THE ATTORNEYS'
12 FEES AS OF THAT DATE. I BROUGHT IT TO CURRENT. THERE IS AN
13 ADDITIONAL ROUGHLY \$7800. I HAVE THAT DECLARATION, AND I WILL
14 SUBMIT THAT TO THE COURT SO WE HAVE IT CURRENT AND UP TO DATE.
15 THAT'S ONE QUANTUM OF THE DAMAGES. IT TOTALS ABOUT \$42,000 IN
16 ATTORNEYS' FEES AND COSTS.

17 IN ADDITION, I HAVE MR. SLATTERY HERE, WHO IS
18 PREPARED TO TESTIFY TO SOME OTHER ELEMENTS OF DAMAGE. FOR THE
19 COURT, I HAVE -- IF YOU WOULD LIKE TO TAKE A LOOK AT IT -- THIS
20 OWN COURT'S TEMPORARY RESTRAINING ORDER, OBVIOUSLY, THE ENTRY OF
21 DEFAULT, MY DECLARATION, ORIGINAL DECLARATION THAT WAS ASKING
22 FOR ATTORNEYS' FEES, AND THE ORDERS FROM THE FEDERAL COURT,
23 INCLUDING MR. SAADAT-NEJAD'S RESPONSE TO THE ALLEGED CONTEMPT,
24 WHERE HE TOLD JUDGE BURNS UNDER OATH THAT HE INTENDED TO GO ON
25 AND REGISTER PACIFIC LAWYERS CENTER, HIS LITTLE VARIANT ON THE
26 THEME, AS HIS TRADEMARK. HE HAS EXHIBITED, EVEN TO THE POINT OF
27 BEING INCARCERATED FOR CONTEMPT, A CONTINUING DESIRE TO FLAUNT
28 ORDERS, NOT ONLY OF THIS COURT BUT ALSO OF JUDGE BURNS.

EXHIBIT 3 - PAGE 2

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I BELIEVE WE QUALIFY TO HAVE THIS CASE MARKED AS AN
EXCEPTIONAL CASE, THE STANDARD FOR WHICH, YOUR HONOR, IS SIMPLY
THAT THE COURT FIND THAT HIS CONDUCT IS BEYOND THE PALE OF
REASONABLE CONDUCT. THEN, OBVIOUSLY, THERE ARE ALSO SOME
DAMAGES. I WILL ALSO CONCEDE ON THE RECORD THAT THE CHANCES OF
COLLECTING ON THAT JUDGMENT ARE PROBABLY SLIM, BUT WE'D LIKE TO
TERMINATE THIS CASE WITH A PERMANENT INJUNCTION AND A JUDGMENT
THAT WOULD AT LEAST GIVE US A JUDGMENT FOR DAMAGES. IF I COULD
HAND TO THE BAILIFF AND PERHAPS HE WOULD GIVE YOUR HONOR SOME
PAPERS, IT WILL SAVE YOUR LEAFING THROUGH THE FILE, YOUR HONOR.
AND ALSO THE ORDERS OUT OF THE FEDERAL COURT.

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THE COURT: ALL RIGHT.

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MR. MCINTYRE: AS YOU REMEMBER, IN EARLY COLLOQUY, YOUR
HONOR, ABOUT THE FIRST AMENDMENT IMPLICATIONS FOR COMMERCIAL
SPEECH THAT WAS PENDING BEFORE THE CALIFORNIA SUPREME COURT, YOU
ASKED ME IF I HAD GONE AND READ THE BRIEFS FILED IN THE COURT.
I DID. AND THE CASE OUT OF LAGUNA BEACH, I BELIEVE, THE PERSON
STANDING OUTSIDE SLANDERING. AS YOUR HONOR KNOWS, IN A SPLIT
DECISION, THE CALIFORNIA SUPREME COURT CAME DOWN IN FAVOR OF
THAT INJUNCTION.

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IF THE COURT HAS QUESTIONS, I WILL ADDRESS ANY ONE
OF THEM. WHEN THE COURT IS READY FOR THE TESTIMONY OF
MR. SLATTERY, I WILL BE HAPPY TO CALL HIM. I HAVE FOR THE
COURT, AND I'LL AGAIN, THROUGH THE BAILIFF, ASK HIM TO PRESENT
IT TO YOUR HONOR, A DAMAGES SUMMARY. I'VE JUST DONE THE MATH
HERE, YOUR HONOR, SO THAT YOU DON'T HAVE TO. AS WELL AS MY
DECLARATION THAT BREAKS DOWN THE ADDITIONAL ATTORNEYS' FEES.
AND I'VE PREPARED A FORM OF JUDGMENT, WHICH WE CAN GET TO, A

2 1 FORMAL PERMANENT INJUNCTION, WHEN YOUR HONOR IS READY.

2 THE COURT: OKAY.

3 MR. MCINTYRE: THAT LAYS OUT, YOUR HONOR, WHAT I HAVE. I
4 WILL BE HAPPY TO PRESENT, AS THE COURT DESIRES.

5 THE COURT: MR. SAADAT-NEJAD IS HERE.

6 MR. MCINTYRE: HE IS PRESENT, YOUR HONOR.

7 THE COURT: DO YOU HAVE SOMETHING TO SAY TO THE COURT?

8 MR. SAADAT-NEJAD: SIR, I HAVEN'T BEEN NOTIFIED OF ANY OF
9 THIS. MARCH 9TH OF THIS YEAR WAS THE FIRST COURT APPEARANCE I
10 MADE IN THIS CASE, AND AGREEMENT WAS MADE THAT I RECEIVE TWO
11 COPIES VIA FEDERAL EXPRESS FOR ANYTHING THAT'S FILED. NOT ONLY
12 THESE, BUT I JUST WALKED INTO COURT ABOUT TEN DAYS AGO, A WEEK
13 AGO, AND DISCOVERED THAT THERE'S BEEN THINGS GOING ON ON
14 CALENDAR REGARDING THIS CASE. THEY HAVEN'T MAILED ME ANYTHING.
15 I RECEIVED ONE ENVELOPE ABOUT THREE WEEKS AGO FROM YOUR COURT.
16 I STILL HAVEN'T BEEN ABLE TO GO RETRIEVE THAT FROM MY DAD, BUT
17 I'M GUESSING IT HAS TO DO WITH THE CONTINUATION OF LAST MONTH,
18 SEPTEMBER 14TH. NOBODY IS MAKING ME AWARE OF ANY OF THIS. THEY
19 ARE NOT MAILING ME OR FED-EXING ME ANY OF THE PAPERS THAT ARE
20 THEY ARE FILING.

21 I WANT TO TAKE THIS MATTER TO TRIAL. I HAVE BEEN
22 GATHERING EVIDENCE, SPENDING TIME AND MONEY TO PREPARE FOR THIS.
23 MY WEB SITES ARE SHUT DOWN OR SUSPENDED BECAUSE OF YOUR -- PART
24 HAS TO DO WITH THE COURT ORDER THAT YOU HAVE GIVEN. AND I WILL
25 QUOTE FROM THE GODADDY.COM EMAIL. PER THE PRELIMINARY,
26 INJUNCTION, YOU AND ANYONE ACTING IN CONCERT WITH YOU ARE
27 ENJOINED FROM REGISTERING OR TRAFFICKING ON ANY INTERNET WEB
28 SITE OR DOMAIN THAT CONTAINS THE WORDS PACIFIC, LAW AND CENTER

2 1 AND SOLOMON AND WARD IN ANY RESPECT WHATSOEVER. FOR EXAMPLE,
2 USHOSTAGE.COM AND THE PACIFICLAWCENTERS.COM HAS BEEN SHUT DOWN
3 AND SUSPENDED BECAUSE OF YOUR COURT ORDER. AGAIN, MY FREEDOM OF
4 SPEECH HAS BEEN GETTING VIOLATED EVER SINCE YOU SIGNED THIS
5 COURT ORDER BEHIND CLOSED DOORS, WHICH I NEVER WAS SERVED TO
6 SHOW UP IN COURT FOR.

7 THE COURT: NOTHING IS DONE BEHIND CLOSED DOORS, SIR.

8 MR. SAADAT-NEJAD: SIR, I WASN'T IN COURT ON FEBRUARY
9 27TH, OR EVEN SERVED WITH THIS LAWSUIT, WHEN YOU SIGNED THE
10 COURT ORDER.

11 THE COURT: I THINK MR. MCINTYRE PRESENTED A PROOF OF
12 SERVICE.

13 MR. MCINTYRE: CORRECT, YOUR HONOR. MR. SAADAT-NEJAD,
14 ALTHOUGH HE CONTINUES TO CLAIM HE WASN'T HERE, WAS HERE. IN
15 FACT, ONE OF YOUR COURT ATTACHES ASKED HIM ON THAT DATE WHETHER
16 HE WANTED THE TRO HEARING RECORDED OR NOT, TRANSCRIBED OR NOT,
17 AND HE SAID NO.

18 JUST FOR THE RECORD, YOUR HONOR, THE INJUNCTION TO
19 WHICH HE IS REFERRING THAT WOULD BAR HIM OR ANYONE ACTING IN
20 CONCERT WITH HIM FROM USING THE WORDS PACIFIC, LAW OR CENTER ON
21 ANY WEB SITE, ET CETERA, IS JUDGE BURNS' PRELIMINARY INJUNCTION,
22 OBVIOUSLY ENFORCED WITH CONTEMPT AND CUSTODY, AND THAT'S THE ONE
23 WE SENT TO GODADDY.COM, AND ANYBODY ELSE, INVITING HIM EITHER TO
24 SHUT DOWN OR STAND IN POSSIBLE CONTEMPT OF JUDGE BURNS' ORDER.
25 HAS NOTHING TO DO WITH YOUR ORDER, YOUR HONOR.

26 MR. SAADAT-NEJAD: LET A JURY DECIDE ON THIS. I'M
27 ALLEGING THAT THIS IS FRAUD IN THIS COURT. THAT COURT ORDER, I
28 WAS NOT SERVED. I WALKED IN ON MY OWN ON MARCH 9TH FOR THE

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1 FIRST TIME. FOR THIS MAN TO SAY THAT I WAS HERE -- I CAN EASILY
 2 GO AND GET SOME KIND OF TRACE WHERE I WAS, MOST LIKELY ON MY
 3 CELL PHONE, TO SEE WHAT WAS USED DURING THE TIME FRAME OF
 4 WHENEVER IT WAS THAT YOU SIGNED THE COURT ORDER. I WASN'T EVEN
 5 IN THE VICINITY. I CAN PROVE THAT.

6 LET ME PRESENT MY EVIDENCE TO A JURY, TO SHOW THAT
 7 THIS WHOLE THING IS A FRAUD, THEY ARE TRYING TO COVER UP ALL THE
 8 CRIMES THAT THEY HAVE COMMITTED AGAINST ME, AND VIOLATION OF MY
 9 FREEDOM OF SPEECH. IT'S STILL GOING ON. WHAT THEY ARE ASKING
 10 THE COURT TO DO IS TO COVER THIS WHOLE THING UP. I WANT TO SHOW
 11 THE JURY ALL MY EVIDENCE.

12 THE COURT: A DEFAULT WAS ENTERED BECAUSE THERE WAS NO
 13 ANSWER FILED?

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14 MR. MCINTYRE: CORRECT, YOUR HONOR, BACK IN APRIL OF THIS
 15 YEAR.

16 MR. SAADAT-NEJAD: SIR, THEY FILED THE EXACT SAME THING
 17 ACROSS THE STREET IN JUDGE BURNS' COURT, A DEFAULT FOR NOT
 18 FILING AN ANSWER. I CAN EASILY TYPE UP A PAPER RIGHT ON THERE
 19 AND SAY THIS IS FRAUD, AND FILE IT WITH THE COURT. I HAD NO
 20 KNOWLEDGE WHAT THIS HEARING IS ABOUT. ALL I READ ON THE
 21 PAPERWORK THAT IS PRINTED OUT FROM THE COMPUTER WAS DEFAULT
 22 HEARING, THAT'S IT. I HAVEN'T RECEIVED NO PAPERWORK. WHAT HE
 23 HAS JUST SERVED ME RIGHT NOW IS THE FIRST TIME I GET COPIES OF
 24 THIS. I NEED A CHANCE TO RESPOND TO THE ATTEMPTS THAT I HAVE
 25 BEEN TRYING TO DO.

26 THE COURT: ALL RIGHT, SIR.

27 MR. MCINTYRE, HE SAYS HE WANTS TO RESPOND. YOU
 28 KNOW THE RULES ABOUT SETTING ASIDE DEFAULTS.

1 MR. MCINTYRE: WELL, FIRST, NO JURY. WE ARE HERE SEEKING
2 INJUNCTIVE RELIEF AND, AS THE COURT MAY FIND, AN EXTRAORDINARY
3 CASE FOR DAMAGES. HE HAD THE TIME TO FILE AN ANSWER. HE KNEW
4 HOW TO FILE AN ANSWER. HE FILED ONE IN FEDERAL COURT. JUDGE
5 BURNS ACCEPTED IT, EVEN THOUGH --

6 THE COURT: I UNDERSTAND ALL THAT. IF I DO THIS AND HE
7 TELLS ME HE WANTS TO SET IT ASIDE, DON'T I HAVE TO SET IT ASIDE?

8 MR. MCINTYRE: YOU DON'T HAVE TO. IT'S WITHIN THE
9 COURT'S DISCRETION, OBVIOUSLY.

10 THE COURT: I KNOW. BUT YOU KNOW THE CALIFORNIA LAW.

11 MR. MCINTYRE: I UNDERSTAND.

12 THE COURT: I'M INCLINED TO LET HIM FILE HIS ANSWER.

13 MR. MCINTYRE: THEN WHAT, YOUR HONOR?

14 THE COURT: THEN WE WILL GO ACCORDING TO THE USUAL RULES,
15 AND WE WILL SEE WHAT HAPPENS.

16 MR. MCINTYRE: SINCE YOU'VE ALREADY ENTERED THE TRO, I
17 WOULD ASK THE COURT TO GIVE HIM TWO OR THREE DAYS TO FILE AN
18 ANSWER, AND SET IT FOR HEARING ON A PERMANENT INJUNCTION, WHICH
19 IS WHY WE ARE HERE.

20 MR. SAADAT-NEJAD: SIR --

21 MR. MCINTYRE: HE DOESN'T GET A JURY TRIAL ON THAT ISSUE.
22 JUDGE BURNS MADE THAT PATENTLY CLEAR TO HIM. AND I THINK YOUR
23 HONOR CAN EQUALLY MAKE IT PATENTLY CLEAR TO HIM. THAT IS YOUR
24 JURISDICTION, AND YOURS ALONE.

25 THE COURT: SIR.

26 MR. SAADAT-NEJAD: YOUR HONOR, I HAVE A LIFE, TOO. AS I
27 SAID, NOBODY NOTIFIED ME OF THESE COURT HEARINGS. SHOULD THE
28 PADRES HAVE MADE IT TO THE PLAYOFFS, IT WOULD BE VERY DIFFICULT

3 1 FOR ME TO MAKE IT TO THIS HEARING.

2 THE COURT: BUT THE PADRES ARE NOT IN THE PLAYOFFS.

3 MR. SAADAT-NEJAD: I KNOW, I KNOW, WHICH REALLY SUCKS.

4 BUT FOR THEM TO MAKE ALL THESE DECISIONS FOR THE COURT GIVEN TWO
5 OR THREE DAYS? GIVE ME SOME MORE TIME TO RESPOND TO THIS. I
6 MEAN, I'M BEING CORNERED. I'VE BEEN GETTING NOTHING BUT
7 CORNERED FROM THE BEGINNING OF THIS. AND FROM JUDGE BURNS.
8 TAKE IT TO TRIAL. THEY WROTE ON THEIR LAWSUIT THAT "WE DEMAND A
9 JURY TRIAL." LET'S TAKE IT OVER THERE.

10 THE COURT: THERE'S NO RIGHT TO A JURY IN THIS TYPE OF A
11 CASE, SIR. YOU HAVE TO UNDERSTAND THAT.

12 MR. SAADAT-NEJAD: SO YOU CAN MAKE ANY DECISION AND
13 THAT'S IT, YOUR HONOR?

14 THE COURT: I'LL GIVE YOU -- CAN YOU FILE YOUR ANSWER
15 WITHIN TWO WEEKS?

16 MR. SAADAT-NEJAD: YES, SIR.

17 THE COURT: ALL RIGHT. YOU HAVE UNTIL THE 19TH TO FILE
18 YOUR ANSWER.

19 MR. SAADAT-NEJAD: OKAY.

20 THE COURT: IF NOT, THIS DEFAULT WILL STAY IN PLACE. IF
21 YOU FILE YOUR ANSWER WE WILL REMOVE THE DEFAULT AND WE WILL GO
22 FORWARD FROM THERE.

23 MR. SAADAT-NEJAD: FAIR ENOUGH, SIR.

24 THE COURT: I DON'T KNOW WHY YOU'RE NOT GETTING THE
25 NOTIFICATION, BECAUSE MR. MCINTYRE IS SENDING TO YOU
26 NOTIFICATIONS. HAVE YOU CHANGED YOUR ADDRESS?

27 MR. SAADAT-NEJAD: NO, SIR. CAN YOU HAVE HIM PROVIDE
28 TRACKING NUMBERS? FROM MY UNDERSTANDING FROM THE COURT, THERE

3 1 WAS A DEFAULT SUBMITTED, AND IT WAS REJECTED BY THE COURT ON MAY
2 31ST OF 2007. I WASN'T EVEN AWARE OF THIS. THEY HAVEN'T BEEN
3 SENDING ME ANYTHING. I MEAN, THEY DID THE SAME THING ACROSS THE
4 STREET WITH JUDGE BURNS. THERE WAS PAPERWORK THAT WAS FILED AND
5 I NEVER RECEIVED THEM IN THE MAIL. I COME TO DOWNTOWN EVERY NOW
6 AND THEN. YES, I WILL COME INSIDE AND LOOK ON THE COMPUTER, IF
7 ANYTHING NEW IS HAPPENING. THAT'S PRETTY MUCH HOW I'M FINDING
8 OUT ABOUT THESE COURT DATES. IT'S NOT BECAUSE THEY ARE
9 FED-EXING ME ANYTHING. THE AGREEMENT WAS TWO COPIES. HAVE THEM
10 PROVIDE TRACKING NUMBERS.

11 MR. MCINTYRE: I THOUGHT I HEARD HIM ADMIT A FEW MINUTES
12 AGO THAT THERE WERE PAPERS AT HIS FATHER'S HOUSE, WHICH, AS THE
13 COURT WILL RECALL, WAS THE AGREEMENT ABOUT WHERE WE SEND PAPERS.
14 WE CAN'T BABY HIM, YOUR HONOR.

15 MR. SAADAT-NEJAD: ABOUT THREE WEEKS AGO AN ENVELOPE CAME
16 IN FROM YOUR COURT.

17 THE COURT: IF YOU'RE GOING TO USE YOUR FATHER'S ADDRESS,
18 ALL THEY HAVE TO DO IS SEND IT TO THAT ADDRESS.

19 MR. SAADAT-NEJAD: YES.

20 THE COURT: IF YOU DON'T GET THEM BECAUSE --

21 MR. SAADAT-NEJAD: NO --

22 THE COURT: JUST A SECOND.

23 -- BECAUSE YOU DON'T GO LOOK FOR IT, YOU DON'T GO
24 VERY OFTEN, YOUR FATHER LOSES IT, OR WHATEVER ELSE, THAT'S NOT
25 THEIR FAULT. IF YOU WANT TO USE A DIFFERENT ADDRESS THAT WORKS
26 BETTER FOR YOU, TELL US WHAT IT IS.

27 MR. SAADAT-NEJAD: SIR, THE SAME ADDRESS WORKS. MY
28 FATHER WILL INFORM ME IF THERE IS A FED EX PACKAGE OR TWO FED-EX

4 1 PACKAGES FOR ME, AND I WILL GO THERE AND PICK THEM UP. THERE
2 HASN'T BEEN. WHEN IT'S REGULAR MAIL, WHATEVER THE COURT WOULD
3 SEND ME, I'M SURE THAT WHEN I COME TO COURT AND LOOK AT YOUR
4 COMPUTER, LOOK AT THE FILE, THE SAME THING IS IN THERE. THAT'S
5 WHY I HAVEN'T GONE BACK. THIS IS ABOUT THREE WEEKS AGO. I'M
6 GUESSING THAT THAT PAPERWORK THAT WAS SENT TO ME HAS TO DO WITH
7 THIS BEING CONTINUED. BUT BEFORE THAT, NOTHING HAS BEEN SENT TO
8 ME. AS I SAID, I WASN'T EVEN AWARE OF A DEFAULT BEING IN THIS
9 WHOLE THING IN APRIL.

10 THE COURT: AT YOUR REQUEST OF USING YOUR FATHER'S
11 ADDRESS, THEY WILL SERVE AT YOUR FATHER'S ADDRESS. WITH A PROOF
12 OF SERVICE FILED, THAT'S GOOD ENOUGH FOR ME TO GO FORWARD. YOU
13 NEED TO GET YOUR ANSWER ON FILE BY THE 19TH.

14 MR. SAADAT-NEJAD: NO PROBLEM, SIR. BUT THEY ARE JUST
15 FILING PAPERWORK SAYING, "YES, WE SERVED HIM." BUT THEY ARE NOT
16 SERVING ME. THESE ARE FALSE STATEMENTS THAT THEY ARE MAKING. I
17 HAVE NO REASON TO LIE ABOUT ANYTHING. ALL I WANT TO DO IS
18 PRESENT MY EVIDENCES TO THE COURT. PLEASE ORDER THEM TO SHOW
19 THE TRACKING NUMBERS FOR THESE PAPERWORKS THAT THEY SAY THEY
20 HAVE SENT ME. THERE IS NO TRACKING NUMBER BECAUSE THERE NEVER
21 WAS FED EX PACKAGES SENT. PROVIDE THE TRACKING NUMBERS.

22 MR. MCINTYRE: SO THE COURT MIGHT UNDERSTAND, I'M ALSO
23 ACCUSED OF HAVING JUDGE BURNS IN MY POCKET. JUDGE BURNS DENIED
24 IT ON THE RECORD. AS YOUR HONOR MIGHT GUESS, IT ISN'T TRUE.
25 PUT THAT IN CONTEXT.

26 MR. SAADAT-NEJAD: WHAT WOULD TRIGGER ME TO GET ANGRY AT
27 JUDGE --

28 THE COURT: JUST A MOMENT, SIR.

EXHIBIT 3 - PAGE 10

4 1 MR. SAADAT-NEJAD: YEAH.

2 THE COURT: WHAT'S THIS ABOUT AN AGREEMENT OF FED EX TWO
3 COPIES, THAT THAT'S THE WAY THE SERVICE WOULD BE DONE?

4 MR. MCINTYRE: THAT IS CORRECT, YOUR HONOR. I BELIEVE
5 THAT'S WHAT IT WAS BECAUSE THAT'S WHAT HE ASKED FOR. IT'S
6 WHATEVER HE HAD ASKED FOR.

7 THE COURT: IS THAT THE WAY IT'S BEEN DONE?

8 MR. MCINTYRE: TO MY KNOWLEDGE. WELL, IN STATE COURT,
9 YES. IN FEDERAL COURT WE HAVE A TOTALLY CAN DIFFERENT REGIME.

10 THE COURT: IF YOU USE FED-EX, THERE WOULD BE TRACKING
11 NUMBERS.

12 MR. MCINTYRE: THERE ARE. THERE SHOULD BE.

13 THE COURT: MAKE AN ARRANGEMENT WITH FED-EX THAT YOU
14 OBTAIN THE TRACKING NUMBERS, SO YOU WON'T HAVE A DISPUTE ABOUT
15 THIS.

16 MR. MCINTYRE: ALL RIGHT, YOUR HONOR. WOULD YOU SET A
17 HEARING DATE, YOUR HONOR, FOR THE HEARING ON THE PERMANENT
18 INJUNCTION?

19 THE COURT: WHEN WOULD YOU BE ABLE TO DO THAT?

20 MR. MCINTYRE: LOOKING AT YOUR CALENDAR, ARE YOU
21 AVAILABLE FRIDAY, THE 26TH?

22 THE COURT: NO, THE 26TH IS A CALENDAR DAY. THIS IS
23 GOING TO TAKE SOME TIME, I ASSUME, FOR THIS HEARING.

24 MR. MCINTYRE: WHATEVER THE COURT WOULD LIKE.

25 THE COURT: HOW LONG WOULD THIS HEARING TAKE?

26 MR. MCINTYRE: FOR ME, YOUR HONOR, ALMOST NO TIME,
27 BECAUSE IT'S A PERMANENT INJUNCTION BASED ON THE PRELIMINARY
28 INJUNCTION THE COURT'S ALREADY ISSUED, BASED ON THE TEMPORARY

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1 RESTRAINING ORDER THE COURT'S ISSUED. ALL WE ARE LOOKING FOR IS
2 A JUDGMENT, AND THEN A PROVE-UP ON FEES, IF THE COURT FINDS IT'S
3 AN EXCEPTIONAL CASE, WHICH WOULD TAKE ABOUT FIVE MINUTES TO
4 PROVE UP.

5 THE COURT: SIR, HOW LONG DO YOU THINK THIS HEARING WOULD
6 TAKE?

7 MR. SAADAT-NEJAD: I HAVE TO READ THE STUFF THAT THEY ARE
8 GOING TO FILE. IT'S HARD FOR ME TO SAY. MY GUESS WOULD BE 45
9 MINUTES TO AN HOUR.

10 THE COURT: WE HAVE --

11 MR. SAADAT-NEJAD: THEY HAVE ATTEMPTED TO COLLECT FEES
12 TWICE, HERE AND ACROSS THE STREET, ON THE SAME ALLEGATIONS.
13 THEY ARE DOING A DOUBLE WHAMMY.

14 THE COURT: DO WE HAVE A DATE IN NOVEMBER SOMETIME WHERE
15 WE CAN HANDLE ALL THIS? I WANT TO GIVE -- MIGHT BE A LITTLE
16 LONGER THAN AN HOUR. I WANT TO GIVE MR. SAADAT-NEJAD AN
17 OPPORTUNITY TO GET HIS MATERIALS TOGETHER AND GET HIS THINKING
18 TOGETHER. I'M NOT SURE WHAT WE HAVE AVAILABLE.

19 THE CLERK: NOVEMBER 13TH.

20 THE COURT: HOW IS TUESDAY, THE 13TH?

21 MR. MCINTYRE: THAT'S FINE, YOUR HONOR.

22 THE COURT: MR. SAADAT-NEJAD, HOW IS THAT FOR YOU?

23 MR. SAADAT-NEJAD: THAT'S NOVEMBER?

24 THE COURT: YES, TUESDAY, THE 13TH. DOES THAT WORK FOR
25 YOU?

26 MR. SAADAT-NEJAD: YES, SIR, IT WOULD WORK.

27 THE COURT: OKAY. WE CAN DO IT AT NINE O'CLOCK --
28 PROBABLY TEN O'CLOCK IN THE MORNING.

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EXHIBIT 3 - PAGE 12

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MR. MCINTYRE: THAT WOULD BE FINE, YOUR HONOR. THANK YOU.

THE COURT: IS THAT ALL RIGHT?

MR. SAADAT-NEJAD: SURE.

THE COURT: TUESDAY, THE 13TH, 10 A.M. WE WILL TAKE IT UP THEN.

MR. MCINTYRE: THANK YOU, YOUR HONOR.

MR. SAADAT-NEJAD: THANK YOU, SIR.

THE COURT: THANK YOU VERY MUCH.

(PROCEEDINGS ADJOURNED.)

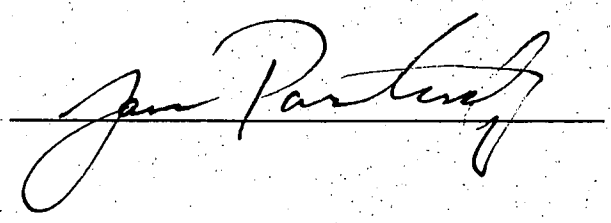
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1 STATE OF CALIFORNIA)
: SS.
2 COUNTY OF SAN DIEGO)

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I, JAMES PARTRIDGE, CSR NO. 6226, AN OFFICIAL
REPORTER FOR THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, IN
AND FOR THE COUNTY OF SAN DIEGO, DO HEREBY CERTIFY THAT I
REPORTED IN MACHINE SHORTHAND THE PROCEEDINGS HAD IN THE ABOVE
ENTITLED MATTER, AND THAT THE FOREGOING TRANSCRIPT, CONSISTING
OF PAGES NUMBERED 1 TO 13, INCLUSIVE, IS A FULL, TRUE AND
CORRECT TRANSCRIPT OF SAID PROCEEDINGS.

DATED AT SAN DIEGO, CALIFORNIA, THIS 17TH DAY OF
OCTOBER 2007.



JAMES PARTRIDGE, CSR NO. 6226

This message is not flagged. [Flag Message - Mark as Unread.]

From: sales@godaddy.com  Add to Address Book  Add Mobile Alert
To: c9729972@yahoo.com
Subject: Go Daddy Software Administrative Fee
Date: 8 Aug 2007 15:48:30 -0700

Dear Shahrokh Saadat-Nejad,

We recently received an inquiry related to your domain name, USHOSTAGE.COM, SOCOMMIL.COM, USGOVERNMENTCOURT.COM, CIVILCASENUMBERS.COM, USGOVERNMENTCOURTS.COM, DUISANDIEGODUI.COM, USGOVERNMENTJUDGES.COM, 100FREELAWYERS.COM. The specific inquiry related to your domain name can be described as follows:

A filed Legal Complaint has been received concerning the domain(s). Please contact domaindisputes@godaddy.com with any questions.

In accordance with our registration agreement,

https://www.godaddy.com/gdshop/legal_agreements/domain_registration_GD.asp?pr og_id=GoDaddy&isc=&se=&from_app=&app_hdr=,

we have charged your credit card in the amount of \$29.00 for our processing of this inquiry.

If you have any questions concerning the above, please contact our customer service center.

Thank you for your continued business,
GoDaddy.com

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EXHIBIT 4 - PAGE 1

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

CASE NUMBER 61K878352	COMPLAINT DATE	HEARING DATE FEB 27 2007	HEARING TIME 9 am	DEPT 75	FOR COURT USE ONLY of the Superior Court FEB 27 2007 BY: M. WONG-JIMENEZ Deputy
JUDGE RICHARD E.L. STRAUSS		CLERK M. WONG-JIMENEZ			
REPORTER				CSR #	
PLAINTIFF/PETITIONER Pacific Law Center			ATTORNEY FOR PLAINTIFF/PETITIONER Edward J. McEntire		
DEFENDANT/RESPONDENT Saadatnejad			ATTORNEY FOR DEFENDANT/RESPONDENT		

COUNSEL FOR MOVING PARTY MUST FILL IN TOP PORTION, EXCLUDING NAMES OF JUDGE, CLERK AND REPORTER. ALL COUNSEL MUST PRINT NAMES IN SPACE OPPOSITE THE NAME OF THE PARTY THEY REPRESENT.

EX PARTE APPLICATION FOR: Proposed Preliminary Injunction

MOVING PARTY: Plaintiff

ORDER BY COURT GRANTED DENIED ORDER SHORTENING TIME IS GRANTED DENIED

MOTION FOR PRELIMINARY INJUNCTION IS SET ON / CONT. TO 3/9 AT 3⁰⁰ AM / PM

MOVING PAPERS TO BE FILED AND FAXED / PERSONALLY SERVED BY 3/7/07 by C.O.B.

OPPOSITION TO BE FILED AND FAXED / PERSONALLY SERVED BY 3/7/07 by C.O.B. REPLY 3/7/07 by C.O.B.

TENTATIVE RULING / APPEARANCE NECESSARY

TRIAL DATE CONTINUED TO / SET ON: _____ AT _____ AM / PM ON MOTION OF PLT / DFT BY COURT

TRIAL CONTINUANCE FEE DUE BY _____ PAID [] NOT PAID []

TRIAL READINESS CONFERENCE CONTINUED TO: _____ AT _____ AM / PM ON MOTION OF PLT / DFT. BY COURT

CASE MANAGEMENT CONFERENCE CONTINUED TO / SET FOR _____ AT _____ AM / PM CASE DESIGNATED EXCEPTIONAL

1ST EXCHANGE OF EXPERTS _____ 2ND EXCHANGE OF EXPERTS _____ ALL DEADLINES REMAIN AS SET

MOTION / DISCOVERY / POSTING OF JURY FEES DATE EXT / CONT TO _____ NON JURY / JURY REQUESTED BY PLT / DFT EST. LENGTH OF TRIAL _____ DAYS

VACATE ALL HEARING DATES ORDERED TO ARB / MED. TO BE COMPLETED BY _____ REMOVED FROM ARB / MED. SET ON 45 DAY DISMISSAL CALENDAR

LEAD CASE NO. _____ CONSOLIDATED WITH _____

COURT ORDERS A STAY OF EVICTION UNTIL _____

SETTLEMENT CONFERENCE WITH JUDGE _____ COUNSEL ARE TO CALL FOR A DATE WITHIN THE NEXT _____ DAYS

OTHER: Court has read and considered the plaintiffs ex parte application and denies the preliminary injunction but grants a temporary protective order. Counsel for Pacific Law Center to post a \$10,000 bond. (may)

DATED: FEB 27 2007

→ EXHIBIT 5 - PAGE 1 ← JUDGE OF THE SUPERIOR COURT

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F I L E D

Clerk of the Superior Court

FEB 27 2007 *ty*

By: J. JOHNSON, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

PACIFIC LAW CENTER, a Professional Law Corporation,

Plaintiff,

v.

SHAHROKH SAADATNEJAD, individually and doing business as PACIFLAWCENTERS.COM and USHOSTAGE.COM; and DOES 1 through 50, inclusive,

Defendants.

CASE NO. GIC 878352

ORDER GRANTING PACIFIC LAW CENTER'S EX PARTE APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE FOR A PRELIMINARY INJUNCTION

Date: February 27, 2007
Time: 9:00 a.m.
Dept: 75

Complaint Filed: January 12, 2007

I/C Judge: Hon. Richard E.L. Strauss

EXHIBIT 5 - PAGE 2

1 Upon the *ex parte* application of Pacific Law Center, and the declarations of Thomas
2 Slattery and Matthew Spiegel, and for good cause shown,

3 IT IS HEREBY ORDERED AND DECREED, as follows:

4 1. Plaintiff Pacific Law Center's *ex parte* application for a temporary restraining
5 order is GRANTED.

6 2. Until further order of this Court Shahrokh Saadatnejad shall immediately to
7 cease using the website pacificlawcenters.com or any similar website.

8 3. Until further order of this Court, Shahrokh Saadatnejad shall not use the trade
9 name Pacific Law Center in any published communication.

10 4. IT IS FURTHER ORDERED AND DECREED that Shahrokh Saadatnejad shall
11 appear on March 9, 2007 at 3:00 p.m. show cause why a preliminary injunction
12 should not issue enjoining and restraining him from using the website pacificlawcenters.com
13 or any similar website and from using the trade name Pacific Law Center in any published
14 communication until the trial of this case.

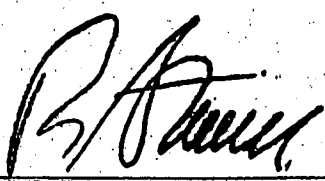
15 5. Plaintiff shall file and personally serve any supplemental papers in support of
16 its application for a preliminary injunction on or before March 7, 2007 by noon

17 6. Shahrokh Saadatnejad shall file and personally serve any opposition on or
18 before March 7, 2007 by 5pm.

19 7. Pacific Law Center shall file and personally serve any reply on or before
20 March 7, 2007 by 5pm.

21 IT IS SO ORDERED.

22 Dated: FEB 27 2007



23 RICHARD E.L. STRAUSS
24 JUDGE OF THE SUPERIOR COURT

25
26
27
28 EXHIBIT 5 - PAGE 3

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):
 Edward J. McIntyre [SBN 80402]
 Christina M. Milligan [SBN 231655]
 Solomon Ward Seidenwurm & Smith, LLP
 401 B Street, Suite 1200
 San Diego, CA 92101
 TELEPHONE NO. (Optional): (619) 231-0303 FAX NO. (Optional): (619) 231-4755
 E-MAIL ADDRESS (Optional): emcintyre@swsslw.com
 ATTORNEY FOR (Name): Pacific Law Center

FOR COURT USE ONLY

F I L E D
 Clerk of the Superior Court
FEB 27 2007
 By: M. WONG-JIMENEZ, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

HALL OF JUSTICE, 330 W. BROADWAY, SAN DIEGO, CA 92101-3827
 NORTH COUNTY DIVISION, 325 S. MELROSE DR., VISTA, CA 92083-6643
 EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020-3941
 RAMONA BRANCH, 1428 MONTECITO RD., RAMONA, CA 92065-5200
 SOUTH COUNTY DIVISION, 500 3RD AVE., CHULA VISTA, CA 91910-5649

PLAINTIFF(S) PACIFIC LAW CENTER, a Professional Law Corporation

JUDGE: Richard E.L. Strauss

DEFENDANT(S) SHAHROKH SAADATNEJAD, individually and doing business as PACIFICLAWCENTERS.COM, et al.

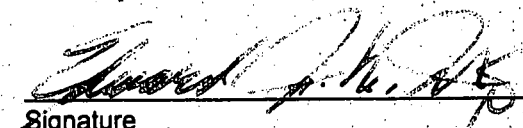
DEPT: 75

CERTIFICATE OF SERVICE
 (San Diego Superior Court Rules, Division II, Rule 2.5)

CASE NUMBER
 GIC 878352

I certify under penalty of perjury under the laws of the State of California that all defendants named in the complaint of the above-entitled case have either made a general appearance or have been properly and timely served in compliance with San Diego Superior Court Rules, Division II, Rule 2.5.

Date: February 27, 2007


 Signature

EDWARD J. MCINTYRE
 Typed or printed name

NOTES:

If service cannot be effected on all defendants within 60 days of filing the complaint, DO NOT USE THIS CERTIFICATE, but file the form CERTIFICATE OF PROGRESS (SDSC CIV-144) stating the reasons why service has not been effected on all parties and what is being done to effect service.

THE FILING OF A GENERAL APPEARANCE BY A DEFENDANT DOES NOT DISPENSE WITH THE PLAINTIFF'S OBLIGATION TO FILE THIS DOCUMENT.

EXHIBIT 5 - PAGE 4

Solomon Ward

Attorneys at Law

Solomon
Ward
Seidenwurm &
Smith LLP

Wells Fargo Plaza
401 B Street, Suite 1200
San Diego, California 92101
Telephone (619) 231-0303
Facsimile (619) 231-4755
www.swslaw.com

Edward J. McIntyre, Partner
emcintyre@swslaw.com
Direct Dial (619) 238-4823
Direct Fax (619) 615-7923

March 12, 2007

VIA FEDERAL EXPRESS

Mr. Shahrokh Saadat-Nejad
3713 Mt. Ashmun Place
San Diego, CA 92111

Re: *Pacific Law Center v. Shahrokh Saadatnejad*

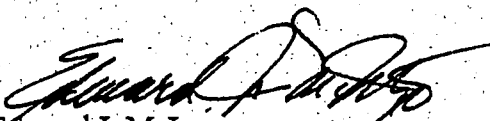
Dear Mr. Saadat-Nejad:

Thank you for telling me that, upon learning that Solomon Ward owns the domain name solomonward.com, you abandoned the domain name, solomonwardlawfirm.com.

As you know, the Court has set a preliminary injunction hearing on March 27, 2007 to address that precise issue.

If you are willing to sign the enclosed stipulation, then I will inform the Court. There will be no need for you to attend that hearing, there will be no hearing, and Solomon Ward will not attempt to get an injunction against you. Please let me know your response promptly.

Very truly yours,


Edward J. McIntyre
Solomon Ward Seidenwurm & Smith, LLP

EJM/d

Enclosure

P:303066.1:57122.002

EXHIBITS - PAGE 5

1 EDWARD J. MCINTYRE [SBN 80402]
emcintyre@swsslaw.com
2 CHRISTINA M. MILLIGAN [SBN 231655]
cmilligan@swsslaw.com
3 SOLOMON WARD SEIDENWURM & SMITH, LLP
401 B Street, Suite 1200
4 San Diego, California 92101
Telephone: (619) 231-0303
5 Facsimile: (619) 231-4755

6 Attorneys for Pacific Law Center
7

F I L E D

Clerk of the Superior Court

MAR 19 2007

By: M. WONG-JIMENEZ, Deputy

8 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO**
9

10

11 PACIFIC LAW CENTER, a Professional Law
Corporation,

12

Plaintiff,

13

v.

14

15 SHAHROKH SAADATNEJAD, individually
and doing business as
PACIFICLAWCENTERS.COM and
16 USHOSTAGE.COM; and DOES 1 through
50, inclusive,

17

Defendants.

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CASE NO. GIC 878352

**WITHDRAWAL OF SOLOMON WARD
SEIDENWURM & SMITH, LLP'S
APPLICATION FOR INJUNCTIVE RELIEF**

Date: March 27, 2007

Time: 9:00 a.m.

Dept. 75

Complaint Filed: January 12, 2007

I/C Judge: Hon. Richard E.L. Strauss

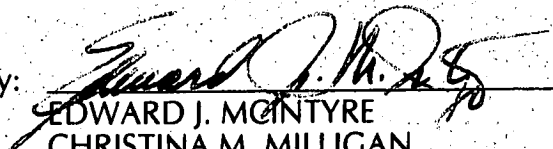
EXHIBIT 5 - PAGE 6

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Solomon Ward hereby withdraws, without prejudice, its motion for a preliminary injunction that this Court scheduled for hearing at 9:00 a.m. on March 27, 2007.

DATED: March 19, 2007

SOLOMON WARD SEIDENWURM & SMITH, LLP

By: 
EDWARD J. MCINTYRE
CHRISTINA M. MILLIGAN
Attorneys for Pacific Law Center and Solomon
Ward Seidenwurm & Smith, LLP

EXHIBITS - PAGE 7

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN DIEGO

DEPARTMENT 75

HON. RICHARD E.L. STRAUSS, JUDGE

PACIFIC LAW CENTER,
A PROFESSIONAL CORPORATION

PLAINTIFF,

VS.

SHAROKH SAADATNEJAD,
INDIVIDUALLY AND DOING BUSINESS AS
PACIFICLAWCENTERS.COM AND
USHOSTAGE.COM; AND DOES 1 THROUGH 50,
INCLUSIVE,

DEFENDANTS.

CASE NO. GIC 878352

I, JAMES PARTRIDGE, CSR NO. 6226, OFFICIAL REPORTER FOR THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, IN AND FOR THE COUNTY OF SAN DIEGO, AFTER HAVING PERFORMED A DILIGENT REVIEW OF MY STENOGRAPHIC RECORDS, DO HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THERE WERE NO PROCEEDINGS HELD ON THE RECORD IN THE ABOVE-ENTITLED MATTER ON FEBRUARY 27, 2007.



DATED THIS 17TH DAY OF OCTOBER 2007, AT SAN DIEGO, CALIFORNIA.



JAMES PARTRIDGE, CSR NO. 6226

This message is not flagged. [Flag Message - Mark as Unread]

Date: Wed, 28 Feb 2007 14:55:23 UT

From: "craigslist" <editor@craigslist.org>  Add to Address Book  Add Mobile Alert

To: c9729972@yahoo.com

Subject: flagged & removed: 285760251 (legal services) Pacific Law Center Will F UCK YOU WITH A SMILE =
PacificLawCenters.com

Your posting has been flagged down by craigslist users.

Approximately 98% of postings removed by flagging are in violation of craigslist posting guidelines.

Please make sure you are abiding by all posted site rules, including our terms of use:

<http://www.craigslist.org/about/terms.of.use.html>

If you need help figuring out why your posting was flagged, try asking other craigslist users in our flag help forum: <http://forums.craigslist.org/?forumID=3>. Include posting title, body, category, city, how often posted, any images, HTML markup, etc.

If your posting was wrongly flagged down (2% of flagged ads are) please accept our apologies and feel free to repost.

Sorry for the hassle, and thanks for your understanding.

Date: 2007-02-27 16:56:26

PostID: 285760251

EXHIBIT 6 - PAGE 1

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

NOV 09 2007
RECEIVED
CLERK OF SUPERIOR COURT
SAN DIEGO

7 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

10 PACIFIC LAW CENTER, a Professional Law
Corporation,

11 Plaintiff,

12 v.

13 SHAHROKH SAADATNEJAD, individually
and doing business as
14 PACIFICLAWCENTERS.COM and
15 USHOSTAGE.COM; and DOES 1 through
50, inclusive,

16 Defendants.

CASE NO. GIC 878352

NOTICE OF CONTINUANCE OF PACIFIC
LAW CENTER'S MOTION FOR
PERMANENT INJUNCTION

Date: December 18, 2007
Time: 10:00 a.m.
Dept. 75

Complaint Filed: January 12, 2007

I/C Judge: Hon. Richard E.L. Strauss

28 EXHIBIT 7 - PAGE 1

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NOTICE IS HEREBY GIVEN that Pacific Law Center's motion for a permanent injunction, previously scheduled for November 13, 2007 at 10:00 a.m. has been continued to December 18, 2007 at 10:00 a.m.

DATED: November 8, 2007

Respectfully submitted,
SOLOMON WARD SEIDENWURM & SMITH, LLP

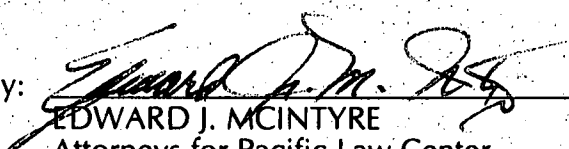
By: 
EDWARD J. MCINTYRE
Attorneys for Pacific Law Center

EXHIBIT 7 - PAGE 2
1



Secretary of State DEBRA BOWEN

11/08/07 SSCPL38

STATUS INQUIRY

PAGE 1

09:51:32.5

CPOISTA3

NAME PACIFIC LAW CENTER, P.C.

CORP NO C2486283 INC. DATE 01/14/2003 STATUS ACTIVE
 DOMESTIC STOCK CLASS
 NO OF PAGES 02 ST/CTRY

STMT/OFFICERS LAST COMPLETE C DATE 03/24/03 NO 0092919
 COMPL/NC N DATE 02/05/07 NO 0071877
 AMENDMENT A DATE 07/23/07 NO 0350148

PRINCIPAL EXECUTIVE ADDR 3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX ARIZONA
 ZIP 85012

CALIFORNIA ADDRESS 4225 EXECUTIVE SQUARE #1550

CITY LA JOLLA CA 92037

MAILING ADDRESS

3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX ARIZONA
 ZIP 85012

CEO NAME JEFFREY L PHILLIPS
 ADDRESS 3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX ARIZONA
 ZIP 85012

AGENT NAME ALAN SPEARS
 ADDRESS 4225 EXECUTIVE SQUARE #1550

CITY LA JOLLA CA 92037

TYPE OF BUSINESS LAW FIRM/LEGAL SERVICES

ENTR=CONTINUE PF2=HISTORY PF3=BACK TO WORKSCREEN PF10=MAIN MENU

1 EDWARD J. MCINTYRE [SBN 80402]
emcintyre@swsslw.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

DEC 14 2007
COURT CLERK, COUNTY

7 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

10 PACIFIC LAW CENTER, a Professional Law Corporation,
11 Plaintiff,
12
13 v.
14 SHAHROKH SAADATNEJAD, individually
and doing business as
15 PACIFICLAWCENTERS.COM and
USHOSTAGE.COM; and DOES 1 through
16 50, inclusive,
17 Defendants.

CASE NO. GIC 878352
**NOTICE OF WITHDRAWAL OF PACIFIC
LAW CENTER'S MOTION FOR
PERMANENT INJUNCTION**
Date: December 18, 2007
Time: 10:00 a.m.
Dept. 75
Complaint Filed: January 12, 2007
I/C Judge: Hon. Richard E.L. Strauss

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EXHIBIT 7 - PAGE 4

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NOTICE IS HEREBY GIVEN that Pacific Law Center withdraws, without prejudice, its motion for a permanent injunction, scheduled for December 18, 2007 at 10:00 a.m.

DATED: December 14, 2007

Respectfully submitted,

SOLOMON WARD SEIDENWURM & SMITH, LLP

By: 
EDWARD J. MCINTYRE
Attorneys for Pacific Law Center

EXHIBIT 7 - PAGE 5



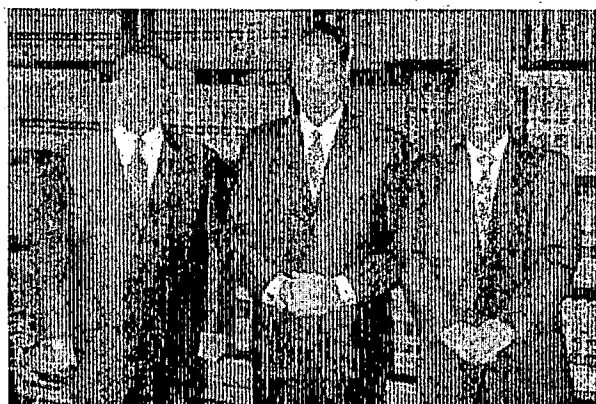
ARIZONA'S
LAW FIRM



SAN DIEGO'S
LAW FIRM



FRAUD ALERT - SAN DIEGO



Jeffrey L. Phillips - a La Jolla, California (CA) Lawyer

Jeffrey L. Phillips. Firm:, Pacific Law Center. Address:, 4225 Executive Square Suite 1550 ... State Bar of Arizona Member. State Bar of California Member ...

pview.findlaw.com/view/1722400_2?noconfirm=0 - 25k - [Cached](#) - [Similar pages](#)

John A. Schill - a La Jolla, California (CA) Accident Injury Lawyer

John A. Schill. Firm:, Pacific Law Center. Address:, 4225 Executive Square Suite 1550 La Jolla, CA 92037 Map & Directions. Phone:, (877) 749-0000 ...

pview.findlaw.com/view/2834483_2 - 19k - [Cached](#) - [Similar pages](#)

Barry S. Wagner - a La Jolla, California (CA) Lawyer

Barry S. Wagner. Firm:, Pacific Law Center. Address:, 4225 Executive Square Suite 1550 La Jolla, CA 92037 Map & Directions. Phone:, (877) 749-0000 ...

pview.findlaw.com/view/3549451_2?noconfirm=0 - 22k - [Cached](#) - [Similar pages](#)

11/08/07 SSCPL38

STATUS INQUIRY

PAGE 1

09:51:32.5

CPOISTA3

NAME PACIFIC LAW CENTER, P.C.

CORP NO C2486283 INC. DATE 01/14/2003 STATUS ACTIVE
DOMESTIC STOCK CLASS
NO OF PAGES 02 ST/CTRY

STMNT/OFFICERS LAST COMPLETE C DATE 03/24/03 NO 0092919
COMPL/NC N DATE 02/05/07 NO 0071877
AMENDMENT A DATE 07/23/07 NO 0350148

PRINCIPAL EXECUTIVE ADDR 3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX ARIZONA
ZIP 85012

CALIFORNIA ADDRESS 4225 EXECUTIVE SQUARE #1550

CITY LA JOLLA CA 92037

MAILING ADDRESS

3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX ARIZONA
ZIP 85012

CEO NAME JEFFREY L PHILLIPS
ADDRESS 3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX ARIZONA
ZIP 85012

AGENT NAME ALAN SPEARS
ADDRESS 4225 EXECUTIVE SQUARE #1550

CITY LA JOLLA CA 92037

TYPE OF BUSINESS LAW FIRM/LEGAL SERVICES

ENTR=CONTINUE PF2=HISTORY PF3=BACK TO WORKSCREEN PF10=MAIN MENU

EXHIBIT 8 - PAGE 2



Secretary of State DEBRA BOWEN

11/08/07 SSCPL38

STATUS INQUIRY

PAGE 1

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NAME PACIFIC LAW CENTER, P.C.

CPOISTA3

CORP NO C2486283 INC. DATE 01/14/2003 STATUS ACTIVE
DOMESTIC STOCK CLASS

NO OF PAGES 02 ST/CTRY

STMNT/OFFICERS LAST COMPLETE C DATE 03/24/03 NO 0092919
COMPL/NC N DATE 02/05/07 NO 0071877
AMENDMENT A DATE 07/23/07 NO 0350148

PRINCIPAL EXECUTIVE ADDR 3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX

ARIZONA

ZIP 85012

CALIFORNIA ADDRESS 4225 EXECUTIVE SQUARE #1550

CITY LA JOLLA

CA 92037

MAILING ADDRESS

3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX

ARIZONA

ZIP 85012

CEO NAME JEFFREY L PHILLIPS
ADDRESS 3030 N 3RD ST #1100

CITY/ST/CNTRY PHOENIX

ARIZONA

ZIP 85012

AGENT NAME ALAN SPEARS
ADDRESS 4225 EXECUTIVE SQUARE #1550

CITY LA JOLLA

CA 92037

TYPE OF BUSINESS LAW FIRM/LEGAL SERVICES

ENTR=CONTINUE PF2=HISTORY PF3=BACK TO WORKSCREEN PF10=MAIN MENU

EXHIBIT 8 - PAGE 3 WITH LOGO

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Edward J. McIntyre [SBN 80402] Solomon Ward Seidenwurm & Smith, LLP 401 B Street, Suite 1200 San Diego, CA 92101 TELEPHONE NO.: (619) 231-0303 FAX NO. (Optional): (619) 231-4755 E-MAIL ADDRESS (Optional): emcintyre@swsslw.com ATTORNEY FOR (Name): Pacific Law Center	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: CITY AND ZIP CODE: San Diego, CA 92101 BRANCH NAME: Central Branch	
CASE NAME: PACIFIC LAW CENTER v. SHAHROKH SAADATNEJAD, et al.	
SUBSTITUTION OF ATTORNEY—CIVIL (Without Court Order)	CASE NUMBER: GIC 878352

THE COURT AND ALL PARTIES ARE NOTIFIED THAT (name): **Pacific Law Center** makes the following substitution:

1. Former legal representative Party represented self Attorney (name): **Edward J. McIntyre**
2. New legal representative Party is representing self Attorney
 - a. Name: **Thomas W. Slattery, Esq.**
 - b. State Bar No. (if applicable): **208275**
 - c. Address (number, street, city, ZIP, and law firm name, if applicable): **Pacific Law Center, 4225 Executive Square, Suite 1550, La Jolla, CA 92037**
 - d. Telephone No. (include area code): **(888) 789-0123**
3. The party making this substitution is a plaintiff defendant petitioner respondent other (specify):

***NOTICE TO PARTIES APPLYING TO REPRESENT THEMSELVES**

- | | | |
|--|---|---|
| <ul style="list-style-type: none"> • Guardian • Conservator • Trustee | <ul style="list-style-type: none"> • Personal Representative • Probate fiduciary • Corporation | <ul style="list-style-type: none"> • Guardian ad litem • Unincorporated association |
|--|---|---|

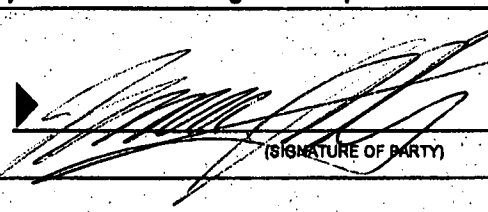
If you are applying as one of the parties on this list, you may NOT act as your own attorney in most cases. Use this form to substitute one attorney for another attorney. SEEK LEGAL ADVICE BEFORE APPLYING TO REPRESENT YOURSELF.

NOTICE TO PARTIES WITHOUT ATTORNEYS

A party representing himself or herself may wish to seek legal assistance. Failure to take timely and appropriate action in this case may result in serious legal consequences.

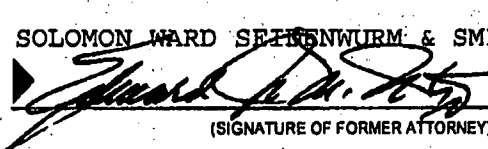
4. I consent to this substitution.
 Date: February 5, 2008.

PACIFIC LAW CENTER
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY)

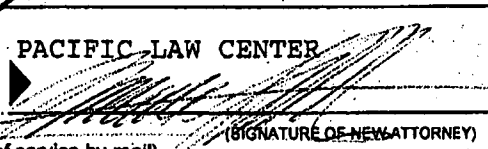
5. I consent to this substitution.
 Date: February 3, 2008

EDWARD J. MCINTYRE
 (TYPE OR PRINT NAME)

SOLOMON WARD SEIDENWURM & SMITH, LLP

 (SIGNATURE OF FORMER ATTORNEY)

6. I consent to this substitution.
 Date: February 5, 2008

THOMAS W. SLATTERY
 (TYPE OR PRINT NAME)

PACIFIC LAW CENTER

 (SIGNATURE OF NEW ATTORNEY)

(See reverse for proof of service by mail)

1 EDWARD J. MCINTYRE [SBN 80402]
emcintyre@swsslaw.com
2 CHRISTINA M. MILLIGAN [SBN 231655]
cmilligan@swsslaw.com
3 SOLOMON WARD SEIDENWURM & SMITH, LLP
401 B Street, Suite 1200
4 San Diego, California 92101
Telephone: (619) 231-0303
5 Facsimile: (619) 231-4755
6 Attorneys for Pacific Law Center
7

F I L E D
Clerk of the Superior Court
MAR 13 2007
By: M. WONG-JIMENEZ, Deputy

8 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO**
9

10
11 PACIFIC LAW CENTER, a Professional Law
Corporation,

12 Plaintiff,

13 v.

14 SHAHROKH SAADATNEJAD, individually
15 and doing business as
PACIFICLAWCENTERS.COM and
16 USHOSTAGE.COM; and DOES 1 through
50, inclusive,

17 Defendants.
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CASE NO. GIC 878352

**PACIFIC LAW CENTER'S EX PARTE
APPLICATION FOR AN ORDER TO
SHOW CAUSE RE CONTEMPT AND
SOLOMON WARD'S EX PARTE
APPLICATION FOR A TEMPORARY
RESTRAINING ORDER**

Date: March 14, 2007
Time: 8:45 a.m.
Dept. 75

Complaint Filed: January 12, 2007

I/C Judge: Hon. Richard E.L. Strauss

EXHIBIT 10 - PAGE 1

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**I
INTRODUCTION**

If you skirt near the edge of the cliff, you run the risk of falling off. Saadat-Nejad has.

**II
ATTACK ON SOLOMON WARD**

After Friday's hearing, Saadat-Nejad acquired the infringing domain name "solomonwardlawfirm.com" on which he has posted false and defamatory statements about the firm.

In that posting, however, he has also violated this Court's temporary restraining order. This Court ordered Saadat-Nejad not to use the domain name "pacificlawcenters.com." On the first full page, in the third full paragraph of the Solomon Ward posting, Saadat-Nejad has used pacificlawcenters.com three times and has attempted to redirect viewers to other sites where he posts the same defamatory material.¹

**III
ADDITIONAL POSTINGS ABOUT PACIFIC LAW CENTER
THAT VIOLATE THE COURT'S ORDER**

In a Craig's List posting about Pacific Law Center—page one, third full paragraph and on the last page—Saadat-Nejad has done the same; he has used pacificlawcenters.com in spite of this Court's temporary restraining order and has attempted to redirect viewers to the same material.

**IV
RELIEF SOUGHT**

Solomon Ward seeks a temporary restraining order and eventually a preliminary and permanent injunction barring Saadat-Nejad from using Solomon Ward Seidenwurm & Smith, Solomon Ward or the name of any attorney in that firm in anything other than papers that he files in this Court or in federal court.²

¹ McIntyre Declaration, ¶¶ 1 and 2.

² Solomon Ward has instituted an action on behalf of Pacific Law Center and itself in the District Court for the Southern District of California, Case No. 07-CV-0460 L (POR).

EXHIBIT 10 - PAGE 2

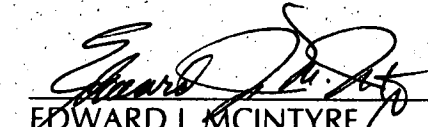
1 Pacific Law Center also asks for an order to show cause why Saadat-Nejad should not
2 be held in contempt for his obviously deliberate flouting of this Court's temporary restraining
3 order.

4
5 DATED: March 13, 2007

Respectfully submitted,

6 SOLOMON WARD SEIDENWURM & SMITH, LLP

7
8 By:



EDWARD J. MCINTYRE
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Attorneys for Pacific Law Center

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7
8 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO**
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11 PACIFIC LAW CENTER, a Professional Law
Corporation,

12 Plaintiff,

13 v.

14 SHAHROKH SAADATNEJAD, individually
15 and doing business as
PACIFICLAWCENTERS.COM and
16 USHOSTAGE.COM; and DOES 1 through
50, inclusive,

17 Defendants.
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CASE NO. GIC 878352

**DECLARATION OF EDWARD J.
MCINTYRE IN SUPPORT OF PACIFIC
LAW CENTER'S EX PARTE APPLICATION
FOR AN ORDER TO SHOW CAUSE RE
CONTEMPT AND SOLOMON WARD'S EX
PARTE APPLICATION FOR A TEMPORARY
RESTRAINING ORDER**

Date: March 14, 2007
Time: 8:45 p.m.
Dept. 75

Complaint Filed: January 12, 2007

I/C Judge: Hon. Richard E.L. Strauss

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28 **EXHIBIT 10 - PAGE 4**

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I, Edward J. McIntyre, declare:

1. I attach as Solomon Ward's Exhibit 1 to this Notice of Lodgment, true and correct copies of postings on "solomonwardlawfirm.com."

2. I attach as Pacific Law Center's Exhibit 2 to this Notice of Lodgment, true and correct copies of postings on "craigslist.com."

I declare under penalty of perjury under the laws of the State of California that the facts in this declaration are true and correct of my own personal knowledge and that I executed it on March 13, 2007 at San Diego, California

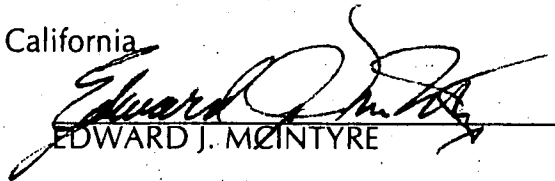

EDWARD J. MCINTYRE

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