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5 Attorney for Plaintiffs

6 **UNITED STATES DISTRICT COURT**  
 7 **SOUTHERN DISTRICT OF CALIFORNIA**

8 PACIFIC LAW CENTER, a Professional Law  
 Corporation: and SOLOMON WARD  
 9 SEIDENWURM AND SMITH LLP,  
 10 Plaintiff,  
 11 v.  
 12 SHAHROKH SAADAT-NEJAD, an individual,  
 13 Defendant,

Civil No: 07-cv-0460-JLS (POR)

**PLAINTIFF PACIFIC LAW CENTER'S  
 NOTICE OF LODGMENT IN REPLY  
 TO COURT'S ORDER TO SHOW  
 CAUSE WHY ACTION SHOULD NOT  
 BE STAYED PENDING DISPOSITION  
 OF STATE ACTION**

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1 Pacific Law Center lodges the following documents with the reply to the Court's March  
2 24, 2008 order why this Court should not abstain and stay these proceedings:

3 Exhibit A: Plaintiff Pacific Law Center's Request for Dismissal of State Court  
4 Proceedings.

5 Exhibit B: Documents filed in said State Court action, identified as follows:

- 6 Attachment 1: Summons; Proof of Service of Summons  
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8 Attachment 2: Complaint for Injunctive Relief and Money Damages  
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10 Attachment 3 Civil Case Cover Sheet  
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12 Attachment 4 Notice of Case Assignment  
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14 Attachment 5 Stipulation to Use of Alternative Dispute Resolution Process  
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16 Attachment 6 Amended Notice of Case Assignment  
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18 Attachment 7 Plaintiff's First Amended Complaint for Injunctive Relief  
19 and Money Damages  
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21 Attachment 8 Substitution of Attorney  
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23 Attachment 9 Pacific Law Center's Ex Parte Application for a Temporary  
24 Restraining Order and Order to Show Cause for a  
25 Preliminary Injunction  
Attachment 10 Declaration of Thomas Slattery in Support of Pacific Law  
Center's Ex Parte Application for a Temporary Restraining  
Order and Order to Show Cause for a Preliminary Injunction  
Attachment 11 Declaration of Matthew Spiegel IN Support of Pacific Law  
Center's Ex Parte Application for a Temporary Restraining  
Order and Order to Show Cause for a Preliminary Injunction  
Attachment 12 Declaration of Edward j. McIntyre in Support of Pacific  
Law Center's Ex Parte Application for a Temporary  
Restraining Order and Order to Show Cause for a  
Preliminary Injunction

1	Attachment 13	Order Granting Pacific Law Center's Ex Parte Application for a Temporary Restraining Order and Order to Show Cause for a Preliminary Injunction
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3	Attachment 14	Certificate of Service
4	Attachment 15	Ex Parte Minutes Re: Preliminary Injunction
5	Attachment 16	Declaration of Shahrokh Saadat-Nejad and Cause for Case Dismissal
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7	Attachment 17	Pacific law Center's Supplemental Memorandum in Support of Its Motion for Preliminary Injunction; Proof of Service
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9	Attachment 18	Declaration of Edward j. McIntyre in Support of Pacific law Center's Motion for Preliminary Injunction
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11	Attachment 19	Pacific law Center's Notice of Lodgment in Support of Its Motion For Preliminary Injunction
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13	Attachment 20	Supplemental Declaration of Edward J. McIntyre in Support of Pacific Law Center's Motion for Preliminary Injunction
14	Attachment 21	Mot- Minutes/ Order of the Court re: Plaintiff Preliminary Injunction
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16	Attachment 22	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
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18	Attachment 23	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
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21	Attachment 24	Declaration of Edward J. McIntyre re: Notice
22	Attachment 25	Request for Dismissal re: Trademark Infringement; As to ushostange.com Only
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24	Attachment 26	Stipulation and Order Concerning Domain Name
25	Attachment 27	Ex Parte Minutes re: Contempt Hearing

1	Attachment 28	Cause for Case Dismissal and Cause for Criminal Actions(s) Against Pacific law Center and Solomon Ward Seidenwurn & Smith
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3	Attachment 29	Withdrawal of Solomon Ward Seidenwurn & Smith, LLP's Application for Injunctive Relief; Declaration of Service
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5	Attachment 30	Response to Saadat-Nejad's Ex Parte
6	Attachment 31	Ex Parte Minutes re: Request to Set A Motion Hearing Date To Dismiss Case
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8	Attachment 32	Pacific Law Center's Supplemental Memorandum in Support of Its Motion for Preliminary Injunction; Declaration of Service
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10	Attachment 33	Declaration of Jeffery Phillips In Support of Pacific Law Center's Supplemental Memorandum in Support of Its Motion for Preliminary Injunction
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12	Attachment 34	Pacific Law Center's Supplemental Memorandum in Support of Its Motion for Preliminary Injunction
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14	Attachment 35	Shahrokh Saadat- Nejad's Response to Ex Parte Attempts and of Ongoing Violations of My Civil Rights
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16	Attachment 36	Request for Entry of Default
17	Attachment 37	Request for Entry of Default Judgment by Court
18	Attachment 38	Plaintiff Pacific Law Center's memorandum of Points and Authorities in Support of request for Entry of Default Judgment by Court
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20	Attachment 39	Declaration of Edward J. McIntyre In Support of Plaintiff's Request for Attorney's Fees
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22	Attachment 40	Plaintiff Pacific Law Center's Notice of Lodgment in Support of Its Memorandum of Points and Authorities In Support of Request for Entry of Default Judgment by Court
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24	Attachment 41	Request for Dismissal
25	Attachment 42	Notice of Rescheduled hearing (Default Prove- Up Hearing)

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- Attachment 43 Notice of Hearing: Civil Court Trial
- Attachment 44 Answer from Shahrokh Saadat- Nejad
- Attachment 45 Notice of Continuance of Pacific Law Center's Motion for Permanent Injunction
- Attachment 46 Notice of Withdrawal of Pacific Law Center's Motion for Permanent Injunction
- Attachment 47 Notice of Hearing (Civil Case Management Conference)
- Attachment 48 Notice of Association of Counsel
- Attachment 49 Case Management Statement
- Attachment 50 Notice of Hearing
- Attachment 51 Notice of Hearing- Trial Readiness Conference

Exhibit C: Declaration of Tatiana Ganuza

Dated: April 25, 2008

Respectfully submitted,  
PACIFIC LAW CENTER

By: /s/ Robert F. Clarke, Esq.  
Robert F. Clarke  
Attorneys for Pacific Law Center