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F I L E D
Clerk of the Superior Court
FEB 26 2007
By: M. WONG-JIMENEZ, Deputy

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6 Attorneys for Pacific Law Center

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

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

CASE NO. GIC 878352

**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**

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

Complaint Filed: January 12, 2007

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

1 I, Matthew Spiegel, declare:

2 1. I am a member of the State Bar of California and an attorney in the criminal
3 law division of Pacific Law Center. I speak both English and Spanish.

4 2. I graduated from the University of Arizona with a bachelor's degree in
5 economics and earned my law degree from Thomas Jefferson School of Law in San Diego. I
6 am experienced in handling various kinds of misdemeanor and felony cases and have tried
7 many misdemeanor and felony cases, including those involving charges of driving under the
8 influence, child abuse and related sex-offender matters.

9 3. I was admitted to practice law in California in November 2005.

10 **Mr. Saadatnejad.**

11 4. Mr. Saadatnejad's mother retained our firm extremely late at night the eve of
12 trial.

13 5. I received a call to that effect at approximately 8:15 in the morning, with trial
14 call in Department 2 being at 8:15-8:30.

15 6. I was able to make it to the courthouse just as Mr. Saadatnejad's case was
16 about to be sent out to a judge for trial. The judge reluctantly allowed me to sub in.

17 7. I then had time to go and actually see Mr. Saadatnejad, who was in custody. I
18 explained that his mom had hired us to represent him and that I had subbed in. I also
19 informed him that I continued the trial date and set a date for another status conference. I
20 also had him initial and sign the retainer agreement.

21 8. It was approximately two weeks later that I received a message from my
22 paralegal that Mr. Saadatnejad wanted to fire us and I tried to see him in county jail but he
23 refused.

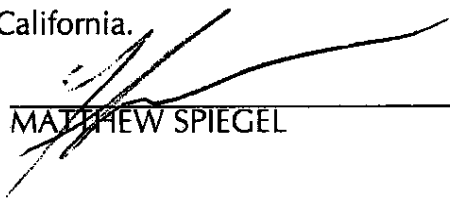
24 9. Then I appeared at the readiness conference and indicated to the judge that I
25 thought we may have been fired but I was not sure and did not want prematurely to ask to
26 be relieved as counsel.

27 10. Mr. Saadatnejad then bailed out of jail two days later, added himself onto
28 calendar, and formally relieved me as attorney of record.

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11. I understand that Pacific Law Center has refunded to Mr. Saadatnejad not only the unused portions of the retainer paid to the firm but **all** of that retainer, even though we had already begun representing him.

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 February 26, 2007 at San Diego, California.


MATTHEW SPIEGEL