

P 57122.002

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FILED
 Clerk of the Superior Court
 MAR 09 2007
 By: J. JOHNSON, Deputy

6 Attorneys for Pacific Law Center

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

PACIFIC LAW CENTER, a Professional Law Corporation,
 Plaintiff,
 v.
 SHAHROKH SAADATNEJAD, individually and doing business as PACIFICLAWCENTERS.COM and USHOSTAGE.COM; and DOES 1 through 50, inclusive,
 Defendants.

CASE NO. GIC 878352
SUPPLEMENTAL DECLARATION OF EDWARD J. MCINTYRE IN SUPPORT OF PACIFIC LAW CENTER'S MOTION FOR PRELIMINARY INJUNCTION
 Date: March 9, 2007
 Time: 3:00 p.m.
 Dept. 75
 Complaint Filed: January 12, 2007
 I/C Judge: Hon. Richard E.L. Strauss

1 I, Edward J. McIntyre, declare:

2 1. Mr. Saadatnejad called me yesterday and, during that conversation, asked to
3 meet and see if we could resolve all of these issues.

4 2. I agreed and immediately arranged a meeting at my office at 10:00 a.m. this
5 morning. Mr. Slattery from Pacific Law Center also attended.

6 3. Mr. Saadatnejad said he did not have a copy of Mr. Slattery's February 26,
7 2007 declaration. We immediately provided one for him.

8 4. After he read the declaration, and in particular paragraph 14, he left our office
9 without further conversation.

10 5. Mr. Saadatnejad complained that we had not put a letter from Mary Frances
11 Prevost—purporting to act as Mr. Saadatnejad's attorney—before the Court. Accordingly, I
12 attach, as Exhibit 1, what I understand to be a true copy of that letter demanding, among
13 other things \$500,000 in damages.

14 6. Mr. Saadatnejad suggested during our conversations that he had not been
15 refunded all moneys paid to Pacific Law Center on his behalf. I attach, as Exhibit 2, a true
16 and correct copy of Pacific Law Center's statement showing that all moneys have been
17 refunded.

18 I declare under penalty of perjury under the laws of the State of California that the
19 facts in this declaration are true and correct of my own personal knowledge and that I
20 executed it on March 9, 2007 at San Diego, California.

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EDWARD J. MCINTYRE

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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 Defense 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
TEL: (866) 464-6662

LOS ANGELES

468 NORTH CAMDEN DRIVE
BEVERLY HILLS, CALIFORNIA 90210
TEL: (866) 464-6662
E-MAIL: IMPD2R@AOL.COM

SAN DIEGO

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

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

EXHIBIT ■ 1

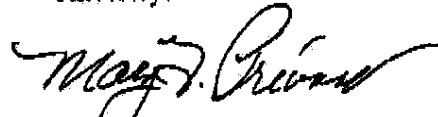
However, in an attempt to globally settle Mr. Saadatnejad's Complaint for Malpractice prior to filing, I suggest the following:

Pacific Law Center, P.C. pay Mr. Saadatnejad \$500,000 in damages. In return, Mr. Sadatnejad will sign over all domain names in his possession related to or referring to Pacific Law Center. Mr. Sadatnejad 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

Pacific Law Center. P.C.
 4225 Executive Square
 #1550
 La Jolla, CA 92037

Statement

Date
12/31/2010

To:
Shahrokh Saadatenjan 811 Alderbrook Lane Cupertino, CA 95014

Date	Transaction	Amount Due	Amount Enc.
		\$0.00	
Date	Transaction	Amount	Balance
05/04/2003	Balance forward		0.00
08/31/2006	INV #14303. Due 08/31/2006. Atty Fees 7990.00	7,990.00	7,990.00
09/01/2006	PMT #visa. Credit Card	-7,990.00	0.00
11/13/2006	CREDMEM #16162. Refund	-3,995.00	-3,995.00
11/13/2006	CHK #cc.	3,995.00	0.00
11/13/2006	CREDMEM #16163. Refund	-3,995.00	-3,995.00
11/13/2006	CHK #cc.	3,995.00	0.00

Saadatenjan, Shahrokh Saadatenjan, Shahrokh

PACIFIC LAW CENTER
 4225 EXECUTIVE SQ #1
 LA JOLLA, CA 92037

BATCH: 012
 S-A-L-E-S D-R-A-F-T
 75758777
 323135744484

REF: 0008
 CD TYPE: DISCOVER
 TR TYPE: CREDIT
 DATE: NOV 13, 06 13:56:43

TOTAL -\$3995.00*

ACCT: 6011000097193896 EXP: 04/09
 **** IMPRINT CARD ****

CARDMEMBER ACKNOWLEDGES RECEIPT OF GOODS AND/OR SERVICES IN THE AMOUNT OF THE TOTAL SHOWN HEREON AND AGREES TO PERFORM THE OBLIGATIONS SET FORTH BY THE CARDMEMBER'S AGREEMENT WITH THE ISSUER

PACIFIC LAW CENTER
 4225 EXECUTIVE SQ #1
 LA JOLLA, CA 92037

BATCH: 012
 S-A-L-E-S D-R-A-F-T
 75758777
 323135744484

REF: 0007
 CD TYPE: VISA
 TR TYPE: CREDIT
 DATE: NOV 13, 06 13:56:04

TOTAL -\$3995.00*

ACCT: 4266041032324277 EXP: 04/08
 **** IMPRINT CARD ****

CARDMEMBER ACKNOWLEDGES RECEIPT OF GOODS AND/OR SERVICES IN THE AMOUNT OF THE TOTAL SHOWN HEREON AND AGREES TO PERFORM THE OBLIGATIONS SET FORTH BY THE CARDMEMBER'S AGREEMENT WITH THE ISSUER

THANKS FOR USING VISA

CREDIT REFUND \$ 7,990.00

CURRENT	1-30 DAYS PAST DUE	31-	MERCHANT COPY	
0.00	0.00		0.00	0.00