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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**

11 PACIFIC LAW CENTER, a Professional Law
 Corporation,

12 Plaintiff,

13 v.

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

17 Defendants.

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

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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).

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

DATED: March 13, 2007

Respectfully submitted,
SOLOMON WARD SEIDENWURM & SMITH, LLP

By: 
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