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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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10
 11 PACIFIC LAW CENTER, a Professional Law
 Corporation,

12 Plaintiff,

13 v.

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

17 Defendants.
 18

CASE NO. GIC 878352

**DECLARATION OF JEFFREY PHILLIPS IN
 SUPPORT OF PACIFIC LAW CENTER'S
 SUPPLEMENTAL MEMORANDUM IN
 SUPPORT OF ITS MOTION FOR
 PRELIMINARY INJUNCTION**

Date: April 20, 2007
 Time: 3:00 p.m.
 Dept. 75

Complaint Filed: January 12, 2007

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

1 Jeffrey Phillips declares:

2 1. I am an attorney admitted to practice law in Arizona. I am an owner of Pacific
3 Law Center, a professional law corporation.

4 **Pacific Law Center.**

5 2. Pacific Law Center is registered with the state bar of California. Pacific Law
6 Center has more than 20 licensed attorneys at its three San Diego offices—La Jolla,
7 Escondido and Chula Vista. Overall, Pacific Law Center has more than 100 employees.

8 3. During the last four years in San Diego, Pacific Law Center has spent millions
9 of dollars in print and other media advertising.

10 4. The sole purpose of that advertising is to associate Pacific Law Center with
11 high quality legal services for our clients in the three areas in which Pacific Law Center
12 attorneys primarily practice: personal injury, criminal law and consumer bankruptcy
13 representation.

14 5. Over the course of time, and because of that advertising, consumers of legal
15 services identify Pacific Law Center with the professional corporation that is registered with
16 the State Bar and that provides high quality legal services for clients throughout San Diego
17 county.

18 6. Pacific Law Center has registered and owns the websites
19 pacificlawcenter.com, pacificlawcenter.net, pacificlawcenter.org and pacificlawcenter.ws.
20 Those websites are a major avenue for clients to learn about Pacific Law Center, its attorneys
21 and the services it provides. They also provide a way for clients to reach Pacific Law Center.

22 7. As a result, the trade name and service mark, "Pacific Law Center" has
23 achieved a secondary meaning in the minds of the consuming public as a specific source of
24 high quality legal services for clients in San Diego county.

25 **Saadat-Nejad's Conduct.**

26 8. Saadat-Nejad has registered at least the websites/domain names
27
28

1 "pacificlawcenters.com"¹ and "pacific-law-center.com." In one instance he simply added an
2 "s" behind Pacific Law Center's name; in the other instance he did not even do that; he
3 merely threw in hyphens.

4 9. Saadat-Nejad, through a lawyer purporting to represent him, has told Pacific
5 Law Center that, unless it pays him \$500,000, he will continue to use the confusingly similar
6 pacificlawcenters.com website and continue to say the things that he has said about Pacific
7 Law Center and its attorneys and employees. I attach a true and correct copy of her letter as
8 Exhibit 1.

9 10. He has personally reiterated that demand to me.

10 11. Since Saadat-Nejad began his campaign using pacificlawcenters.com² and
11 "pacific-law-center.com" there is confusion among consumers of legal services whether his
12 websites are official websites of Pacific Law Center or whether Pacific Law Center endorses
13 them.

14 12. Pacific Law Center has had clients and potential clients call and inquire
15 whether Pacific Law Center admits to engaging in the kind of conduct that Saadat-Nejad
16 accuses it on his pacificlawcenters.com and pacific-law-center.com websites.

17 13. Pacific Law Center has had clients and potential clients tell us that they will
18 not retain Pacific Law Center as a result of what they see on pacificlawcenters.com and
19 what they apparently believe are admissions of Pacific Law Center, the professional
20 corporation.

21 14. Saadat-Nejad has made clear that he will not stop using the Pacific Law Center
22 mark and trade name unless this Court enters an injunction that forces him to do so.

23 15. Indeed, Saadat-Nejad has told Pacific Law Center that he intended to use
24 pacificlawcenters.com to create precisely the kind of confusion in the minds of the
25 consuming public that has in fact occurred.

26
27 ¹ Emphasis added.

² Emphasis added.

1 16. I attach true and correct copies of some of the postings Saadat-Nejad made on
2 the pacificlawcenters.com website as Exhibit 2.

3 17. In those postings, Saadat-Nejad accused Pacific Law Center of lying to and
4 cheating its clients. He calls Pacific Law Center attorneys "thieves," "liars," "scam artists,"
5 "hustlers." He also associates Pacific Law Center with methamphetamine laboratories and
6 child abuse and child slavery.

7 18. He made it look as if the official website of Pacific Law Center has been
8 "hacked."

9 19. He claimed that Pacific Law Center "robbed," him although all of his retainer
10 both unearned and earned was returned in full.

11 **Saadat-Nejad is a Former Client of Pacific Law Center.**

12 20. Saadat-Nejad's mother retained Pacific Law Center to represent him in a
13 criminal case in San Diego extremely late the night before his trial.

14 21. Matthew Spiegel, a Pacific Law Center attorney, was able to make it to the
15 courthouse just as Saadat-Nejad's case was about to be sent out for trial. The judge
16 reluctantly allowed him to substitute for the appointed public defender.

17 22. Mr. Spiegel then had time to go and see Saadat-Nejad, who was in custody.
18 He explained that Saadat-Nejad's mother had hired Pacific Law Center to represent him and
19 that Mr. Spiegel had substituted in for the public defender. He also informed Saadat-Nejad
20 that he continued the trial date and set a date for another status conference. He also had
21 Saadat-Nejad initial and sign the retainer agreement.

22 23. Approximately two weeks later, Mr. Spiegel received a message from a Pacific
23 Law Center paralegal that Saadat-Nejad wanted to fire Pacific Law Center. Mr. Spiegel tried
24 to see Saadat-Nejad at the jail but Saadat-Nejad refused even to speak with him.

25 24. Mr. Spiegel then appeared at the January 18 readiness conference and told the
26 judge that he thought Pacific Law Center may have been fired but was not sure and did not
27 want prematurely to ask to be relieved as counsel.

28 25. Saadat-Nejad then posted bail two days later, added himself on to the

1 January 21 calendar, and formally relieved Pacific Law Center as attorney of record.

2 26. Pacific Law Center has refunded to Mr. Saadat-Nejad not only unused portions
3 of his retainer but, in fact, the whole of that retainer.

4 27. The statements about Pacific Law Center and its attorneys and employees are
5 obviously false and are causing Pacific Law Center damage.

6 28. Pacific Law Center has already suffered irreparable harm as a result of Saadat-
7 Nejad's conduct and it will continue to suffer irreparable harm unless this Court stops him.

8 29. There is no way accurately to determine the whole of the harm that Mr.
9 Saadat-Nejad has done to Pacific Law Center and its reputation and the reputation of its
10 attorneys. As a result, money damages are inadequate to repair that harm. In that respect,
11 Pacific Law Center has suffered and continues to suffer irreparable harm and will do so until
12 this Court stops Mr. Saadat-Nejad.

13 I declare on penalty of perjury under the laws of the State of California that the facts
14 set forth in this declaration are true and correct, based on my own personal knowledge, and
15 that I executed this declaration in San Diego, California on April 6, 2007 at San Diego,
16 California.

17 
JEFFREY PHILLIPS

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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: MRPH2@GMAIL.COM

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

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

EXHIBIT ■ 1

EXHIBIT 1
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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,



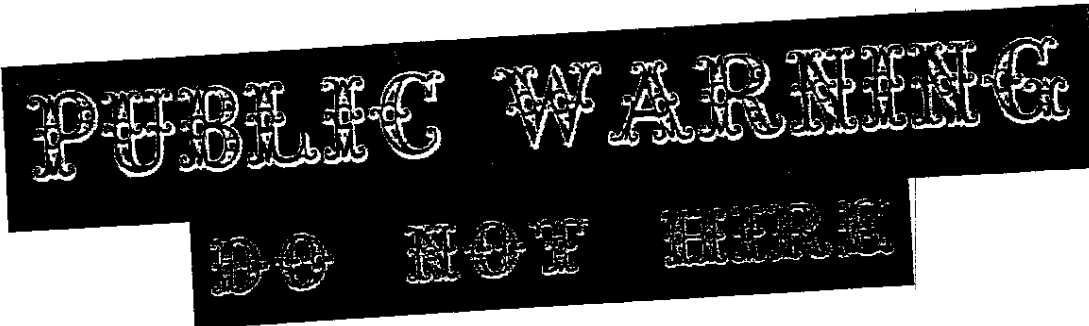
Mary Frances Prevost

M&L RUNWAYS L&M FREE BA ...

OWNER OF PACIFICLAWCENTERS.com IS NOT A LAWYER, ATTORNEY or LAW ENFORCEMENT.
PACIFICLAWCENTERS.com IS NOT INTENDED TO PROVIDE LEGAL ADVICE.

"THE NOBLEST MOTIVE IS THE PUBLIC GOOD"

"I WAS ROBED BY PACIFIC LAW CENTER"



PACIFIC LAW CENTER - CALIFORNIA USA
OWNED BY
PHILLIPS & ASSOCIATES - ARIZONA USA

Pacific Law Center packages itself very well - They have made them selves a Public Icon by heavy advertising spending in the tens of millions of dollars. Below are some civil complaints filed against the "Over 150 years of combined experience" Pacific Law Center.

[1] CIVIL CASE No.GIC879397 - LUCKMAN, CHARLES vs. PACIFIC LAW CENTER - FILED San Diego 02/01/2007

[2] CIVIL CASE No.GIS26363 - GATEWAY CHULA VISTA 2, LLC vs. PACIFIC LAW CENTER - FILED South County 09/28/2006

- [3] CIVIL CASE No.GIC872419 - COSSIO, COLIN C vs. PACIFIC LAW CENTER
- FILED San Diego 09/13/2006
- [4] CIVIL CASE No.GIC871101 - MELTZ, TODD CLAYTON vs. PACIFIC LAW
CENTER - FILED San Diego 08/18/2006
- [5] CIVIL CASE No.GIC868515 - RHOAD, KRISTEN vs. PACIFIC LAW CENTER
- FILED San Diego 07/03/2006
- [6] CIVIL CASE No.SN037043 - ZITO, PHYLLIS vs. PACIFIC LAW CENTER -
FILED North County 05/01/2006
- [7] CIVIL CASE No.SC158346 - GOMEZ, ISABEL vs. PACIFIC LAW CENTER -
FILED Kearny Mesa 12/07/2004
- [8] CIVIL CASE No.SC150154 - SANCHEZ, JOAQUIN TAPIA vs. PACIFIC LAW
CENTER - FILED Kearny Mesa 03/10/2004



"It Is Not Worth The Risk.
Call and Hire Another Attorney."

EXPOSING CORRUPTION AGAINST PHILLIPS & ASSOCIATES AND PACIFIC LAW CENTER

Warning: Video Contains Explicit Language

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E

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

August 30, 2006 Called Pacific Law Center from jail

August 31, 2006 Pacific Law Center became council on record

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

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

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

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

September 19, 2006 Posted Self Bail Cash

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

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

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

January 18, 2007 Pacific Law Center approached my attorney in court, followed my attorney to his car, and has influenced him.

January 26, 2007 Pacific Law Center went to my fathers house in San Diego, California and harassed him and others that were there. Short time later Pacific Law

Center [License Plate [] 5GJM708] went back to my fathers house with the San Diego Police Department. I do not live with my father, which is a fact that Pacific Law Center knows. What lies did Pacific Law Center tell the San Diego Police Department for them to go to my fathers house with Pacific Law Center in a very short notice? San Diego Police Department is very short on officers and it is not fair to say lies about a person(s) in order for the Police to show up, or does Pacific Law Center have a influence on the San Diego Police Department? My father has a very bad heart condition, and this kind of harassment with the police may justify a civil complaint from my father against Pacific Law Center.

My fathers wife was so shaken up by Pacific Law Center harrassing her at her home with the San Diego Police Department that she is still shaken up by the whole thing a day later.

January 26, 2007 on or around 6:22pm EST, I called Pacific Law Center and left a message that if they do not drop their civil complaint against me (I just assumed it has to be a civil matter), then I will expose Phillips and Associates on the World Wide Web. On January 29, 2007 I kept checking the internet and it seems that there is no complaint filed against me from Pacific Law Center or they have dropped their complaint if there was one.

Phillips and Associates in Arizona which owns Pacific Law Center in California needs to act professional and pull their lawyers out of court and see if these attorneys need to be disciplined. This is just one of the things that proves that Phillips and Associates is just as dirty as Pacific Law Center . I must inform the general public about Phillips and Associates. The Public has the right to know, plus I would assume that any attorney that sees intentional wrong doings by another attorney, they must report it to the State Bar. I am not a lawyer, but Ethics and Professionalism is mostly common sense.

On September 18, 2006 when Pacific Law Center waived my right to appear in court and then went ahead and represented me after I had fired them, they got a continuance for the case for several days. If I would not have come up with the money to bail out of jail, I would have been still locked up in jail without having the opportunity to tell the judge that Pacific Law Center was fired on September 8, 2006.

San Diego City Attorney Office was in court on September 18, 2006, and San Diego County District Attorney Office was in court on September 18, 2006 for my case (But I was not). The Deputy San Diego City Attorney, and the Deputy San Diego District Attorney for this case that were in court on September 18, 2006 will also be reported to the State Bar. I can only assume that the City and County of San Diego Law Enforcement are attempting to stop me from exposing this kind of holding a person hostage in jail. I have been seeking a Civil Rights Attorney.

I have decided to take at minimum Pacific Law Center to court for holding me hostage in a jail. San Diego County District Attorney Office is and has been well aware of what Pacific Law Center has done to me by waving my rights to appear in court which resulted me being held in jail like a hostage after I had fired them. San Diego County District Attorney Office is not going to halt Pacific Law Center from representing people in any court which was proven on January 26, 2007 when the San Diego Police Department went to my fathers house with Pacific Law Center , but I will. I am going after their license - All of them! - NO AMOUNT OF MONEY CAN STOP ME -

PACIFICLAWCENTERS.com has a right to expose any and all wrong doings by Pacific Law Center and it is called freedom of speech.

Coming soon: From your computer Listen to Pacific Law Center lie!

EXHIBIT 2
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Please Visit <http://www.phillipslaw.com>
Please Visit <http://www.pacificlawcenter.com>

Do Not Hire Them Darn Hustlers

Look How Similar The Two Websites Are (\$10,000,000 Packaging)

Phillips and Associates in Arizona which owns Pacific Law Center in California spend over \$10,000,000 combined in advertising (Internet and not Internet) per year.

The Attorney that was assigned to my case (CD200499) passed his bar exam only 10 months before I hired Pacific Law Center. Phillips and Associates in Arizona, and Pacific Law Center in California, spend more on advertising than they do on experienced attorneys.

What Pacific Law Center claim for example that they have over 150 years combined experience maybe correct, but when you got for example five supervisors that are in their 40's, thats 100 years of it right there, then you have for example two other supervisors in their 50's that supervise the five supervisors and thats another 40 to 50 years right there, all together you can see their combined experience of 140 to 150 years.

Trust me, these supervisors rarely see a court room.

These experienced lawyers hire inexperienced lawyers and tell the general public [YOU] that they have over 150 years of experience. Save your money and hire a real experienced Lawyer.

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FACT IS: pacificlawcenter.com, phillipslaw.com, fosamax-injury.com,
orthoevraattorneys.net, ketek-injury.com, vioxx-injuryinformation.com,
azabogados.com, trasyolol-info.com, trileptalhelp.com are all owned by Phillips and
Associates located at 3030 North 3rd Street, Suite 1100 Eleventh floor Phoenix,
Arizona 85012 USA (858) 459-1182

Most of the domain names listed above are related to defective medicine. Phillips and Associates and Pacific Law Center buy domain names that are similar to companies domain names that they are complaining about in court and on the World Wide Web.

I am doing the same thing as Phillips and Associates and Pacific Law Center, by exposing what they did to me on the World Wide Web (pacificlawcenters.com) and will probably do so in a court of law as well. It turns out that I am not the only one that has been wronged intentionally by Pacific Law Center . If I was to look into Phillips and Associates (phillipslaw.com) in Arizona , I bet the same pattern as Pacific Law Center will be discovered.

**EXHIBIT 2
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% FREE::Phillips & Associates:Pacific Law Center:Phillips.

.com:PacificLawCenter.com San Diego Phoenix Arizon

EXHIBIT 2
PAGE 9

Add URL-Free.com

Legal Service India.Com - Lawyers - advocates - Law Firms

Legal forms online. Legal documents in a minute.
#1 Free Link Exchange Directory On The Web - Link Market

DUI | Free Dna Test | public liability information | bullet proof vests | dwi attorney
Free Links

Search

SelfGrowth.com
self improvement and personal growth

Best 10 Webhosting

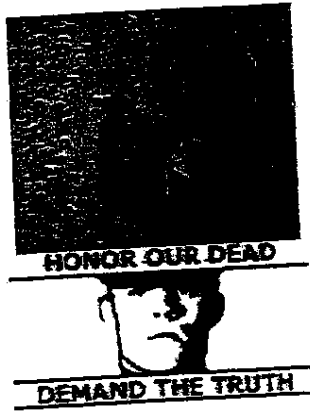


Search

Dig the Web! Web Hosting - PHP MySQL Hosting

Medical malpractice Spokane Attorney Personal Injury Direct LawGuru.com

Coming Soon to PacificLawCenters.com
Bad Attorneys
Federal Prisons
Bad Law Firms
State Department of Corrections
County Sheriff Departments
City, Town, and Village Police Departments
FBI, US Marshals, and DEA
National, State and local offender databases
Crimestoppers and VINE



- dui attorney san diego
- dui attorney phoenix
- dui attorney san diego
- dui lawyer san diego
- dui lawyer phoenix
- birthing center phoenix
- birthing center arizona
- birthing center san diego
- birthing center san diego
- car covers san diego
- car covers phoenix
- Fosamax ®
- mesothelioma attorney san diego
- mold removal san diego
- mold removal phoenix
- mold removal arizona
- mesothelioma attorney san diego
- Fosamax ®
- criminal defense attorneys california
- criminal defense attorney phoenix
- criminal defense lawyer phoenix
- criminal defense attorney san diego
- criminal defense lawyer san diego
- criminal defense attorney california
- criminal defense lawyer los angeles
- criminal defense lawyers los angeles
- criminal defense lawyers san diego
- criminal defense attorney los angeles
- criminal defense attorneys los angeles
- on your side phoenix
- on your side san diego
- on your side phoenix
- phoenix law firms
- debt negotiation service
- criminal defense attorney
- dui records arizona
- dui records san diego
- dmv california
- dui records arizona
- debt negotiation services
- bankruptcy law firms
- how to file bankruptcy in arizona
- assault
- assault
- assault
- bad faith
- bad faith insurance
- criminal defense attorney
- criminal defense attorneys
- criminal defense lawyers
- criminal lawyer
- Fosamax ® 70 mg
- Fosamax ® dosage
- Fosamax ® generic
- Fosamax ® merck ®
- Fosamax ® patent
- Fosamax ® side effects
- alendronate

San Diego Attorneys: Injury, DUI Defense, Bankruptcy Injury, DUI defense, bankruptcy. Call for a free consultation Serious accidents and catastrophic injuries, medical malpractice, Vioxx ® and pharmaceutical litigation. Category: California > La Jolla > Criminal Law Firms www.pacificlawcenter.com - More from this site

San Diego Personal Injury Lawyers | Personal Injury Attorney in San Diego, CA Learn about personal injury law. ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * Tainted Tissue/Contaminated Transplants * Birth Injury " ...www.pacificlawcenter.com/html/personal_injury.html - 35k - Cached - More from this site

EXHIBIT 2
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0% FREE::Phillips & Associates:Pacific Law Center:Phil

DUI Lawyers in San Diego | DUI Defen: ...orney in San Diego | Drunk Driving Lawyer in CA T: ...yers at San Diego's Pacific Law Center can provide an effective defense ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/dul.html - 22k - Cached - More from this site

Auto Insurance Information - Accident Lawyers in San Diego, California We understand the obligations of insurance companies and how to make sure you ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/auto_insurance.html - 32k - Cached - More from this site

Criminal defense attorneys - San Diego - Bankruptcy attorneys - Pacific Law Center Read about the criminal defense, DUI, bankruptcy, and personal injury lawyers in ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/lawyers.html - 45k - Cached - More from this site

San Diego birth injury and cerebral palsy lawyers, Pacific Law Center If your child suffered a birth injury, contact the lawyers at San Diego's Pacific Law Center. ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/birth_injury.html - 17k - Cached - More from this site

San Diego bankruptcy lawyers - Pacific Law Center If you are faced with bankruptcy, an attorney with our San Diego practice can help. ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/bankruptcy.html - 18k - Cached - More from this site San Diego car accident lawyers - Pacific Law Center If you have been injured in an auto accident, the lawyers at San Diego's Pacific ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/auto_accidents.html - 22k - Cached - More from this site

Contact our San Diego personal injury attorneys at Pacific Law Center Residents of San Diego County with wrongful death, DUI, or other legal cases can ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/contact.html - 17k - Cached - More from this site

San Diego criminal defense attorneys explain various criminal charges The types of crimes handled by Pacific Law Center are listed. ... Motorcycle Accidents * Trucking Accidents * Medical Malpractice * ...www.pacificlawcenter.com/html/criminal_cases.html - 19k - Cached - More from this site

Arizona Attorneys:Defective Drugs, Criminal & DUI Defense, Injury Defective drugs, criminal and DUI defense, injury. Free consultation Bankruptcy and debt consolidation, pharmaceutical litigation, family law, estate planning. Category: Arizona > Phoenix > Criminal Law Firms www.phillipslaw.com - More from this site

Criminal defense attorneys - Phoenix - Bankruptcy attorneys - Phillips and Associates Our Phoenix bankruptcy attorneys can help you get out of financial ruin and... Guidant Defibrillator * Premises Liability * Product Liability * Other ...www.phillipslaw.com/html/attorneys.html - 72k - Cached - More from this site

Tucson, Phoenix - Medical malpractice lawyers - Attorneys with Phillips and Associates In Tucson and Phoenix, our medical malpractice attorneys have the experience and ... Guidant Defibrillator * Premises Liability * Product Liability * Other ...www.phillipslaw.com/html/medical_malpractice.html - 33k - Cached - More from this site

Phoenix car accident lawyers - Phillips and Associates Our Phoenix car accident lawyers help the victims of auto accidents, motorcycle accidents, and truck accidents receive the compensation they are legally entitled to.www.phillipslaw.com/html/motor_vehicle_accidents.html - 46k - Cached - More from this site

Contact our Phoenix personal injury attorneys at Phillips and Associates We handle all personal injury cases including medical malpractice, wrongful ... Guidant Defibrillator * Premises Liability * Product Liability * Other Causes ...www.phillipslaw.com/html/contact.html - 23k - Cached - More from this site

Phoenix Vioxx Lawyers - Phillips and Associates - Attorneys at Law If you have been harmed by Vioxx, Celebrex, Naproxen... Guidant Defibrillator * Premises Liability * Product Liability * Other Causes of Action * ...www.phillipslaw.com/html/defective_drugs.html - 46k - Cached - More from this site

Phoenix DUI Attorneys - Phillips and Associates - Latest case results The Phoenix DUI attorneys with Phillips and Associates discuss DUI cases in ... Contingency Fees * Disability * Mesothelioma (Asbestos Cancer) * Mesothelioma ...www.phillipslaw.com/html/dul.html - 32k - Cached - More from this site

Phoenix personal injury lawyers - Phillips and Associates Our Phoenix personal injury lawyers with Phillips and Associates represent ... Guidant Defibrillator * Premises Liability * Product Liability * Other Causes of ...www.phillipslaw.com/html/personal_injury.html - 19k - Cached - More from this site

Phillips and Associates, Arizona - Breaking Legal News We offer criminal and DUI defense attorneys with Phillips and Associates answer frequently ... Guidant Defibrillator * Premises Liability * Product Liability * Other Causes of ...www.phillipslaw.com/html/news.html - 51k - Cached - More from this site

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- Apr 12, 2006 by [johnomatopoeia](#)

This could be minor, or it could be nothing. I really hope it turns out to be erroneous. Aguirre seems like he's actually trying to root out corruption and having some success. If the allegations are true, I would agree that there is a problem. But if his efforts were to be overshadowed by something that might be less

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than accurate would be a shame.

via Cox

A woman who works in San Diego City Attorney Mike Aguirre's office has filed a complaint alleging a hostile work environment in which women are treated as inferior to men. Deputy city attorney Amy Lepine said Aguirre gives men better assignments and more autonomy, while the women work in groups with someone watching over them. Lepine also said Aguirre has made frequent comments on the appearance of female attorneys. Lepine filed her complaint with the city's Equal Opportunity

Investigations Office.

Is it too optimistic for me to hope that those who are trying to do away with corruption and scandal don't get caught up in it themselves? Am I just naive?

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- [Sassy](#)
- wrote on
- April 13, 2006

In the corporate sector this kind of stuff is a standard occurrence. 99% of the time it comes from a disgruntled employee who is either on track to be fired or was passed over for promotion.

- [johnomatopoeia](#)
- wrote on
- April 13, 2006

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I had that sneakin' suspicion about this, Sassy. Still, I also know that it does actually happen too. I just like to believe the best in people and I am often disappointed. I hope this is not another issue that ends up that way.

- PacificLawCenters.com
- wrote on
- February 15, 2007

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- Pacific Law Center San Diego Criminal DUI Defense Attorney Sucks
- wrote on
- February 19, 2007

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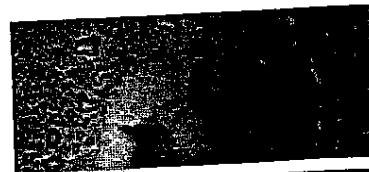
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:: Phillips & Associates - One of Arizona's Largest Consumer Law Firms The following is a list of Arizona Criminal Penalties & Associates your questions, and someone will be ...www.azabogados.com/dui/duipenalties.php

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Phillips and Associates, Arizona - personal injury, bankruptcy ...Phillips and Associates in Arizona has provided this site offer criminal and DUI defense attorneys, ... www.phillipslaw.com/html/site_map.html - 36k - Cached - Similar pages

Arizona Mesothelioma Lawyers and Attorneys - Phillips and Associates Were you injured by asbestos exposure in Arizona Associates can help you pursue justice against those responsible ... www.arizona-mesothelioma-help.com/ - 8k - Cached

Phillips & Associates - a Phoenix, Arizona (AZ) Bankruptcy Law Law ...Phillips & Associates. Address: 3030 North 3rd 85012-3049 Map & Directions. Phone: (877) 847-3000 ... pview.findlaw.com/cmd/view?wld_id=1722397&pid=1 - 32k -

San Diego County Criminal Case No CD200499 and Case No. M897962
Phoenix, Arizona Birth Injury Attorneys - Phillips and Associates The Phoenix, Arizona birth injury attorneys of Phillips & Associates medical malpractice - both ... www.arizonabirthinjury.net/ - 14k - Cached - Similar pages

:: Phillips & Associates - One of Arizona's Largest Consumer Law Firms The principle office of Phillips & Associates, is August 30, 2006 Called Pacific Law Center from jail index.php - 44k - Cached - S

:: Phillips & Associates - One of Arizona's Largest Consumer Law Firms Or email Phillips & Associates your questions, and August 31, 2006 Pacific Law Center became council on record www.azabogados.com/main.php - 44k - Cached - Similar pa

Medical Malpractice Attorneys in Phoenix, Arizona - Medical ...Serving Phoenix and all of Arizona, the medical negligence determined to help you and your loved ones cope with the ... www.arizonamedicalmalpractice.net/ - 5k - Cached - Simi

September 8, 2006 Fired Pacific Law Center by phone from jail
because of lack of communication and council service
Criminal Cases, Felonies and ... www.lawyers.com/Arizona/Phoenix/Phillips-and-Associates-Law-Offices,-P.C.-49061-f.ht

September 11, 2006 Pacific Law Center refused to acknowledge
of being fired and came to jail - I refused to see them
Residents as well as people across all of Arizona. ... dui.com/duilawyers/Dui_Attorney6252.htm

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

(3) about my criminal charges, petitions, 7/11 and my website
US HOSTAGE DEFENSE CRIMINAL DEFENSE***** Tucson Federal Defense, Arizona Imperial County Criminal
Phoenix, phillipslaw, phillips & Associates, ... phoenix.craigslist.org/igs/275011014.html - Similar pages

September 18, 2006 Taken from jail to court was not taken
into the court room - No information given to me
Phoenix, Arizona Cerebral Palsy Lawyers - Attorneys of Phillips ...Phoenix, Arizona parents of babies with cerebral palsy
Phillips and Associates are have decades of experience ... www.arizonamedicalpractice.net/html/cerebral_palsy.html

September 19, 2006 Posted Self Bail Cash
Contact Fosamax@ Attorneys in Arizona: Phillips&AssociatesPhillips and Associates can provide a free comprehensive ca
California, and throughout the United States. www.fosamax-injury.com/html/contact.html - 9k - Cached - Similar pages

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

Phoenix Medical Malpractice Lawyer Attorney Lawyers Attorneys Browse the premium directory of Arizona AZ
Associates Phoenix, Arizona, Profile ... lawyers.mblaw.com/lawyer/firm/Medical_Malpractice/Phoenix,Arizona - 42k - C

December 15, 2006 Received a very disturbing phone
call regarding pacificlawcenters.com
Tempe Medical Malpractice Lawyer Attorney Lawyers Attorneys ...Law Offices of Dr. Samuel K. Cullian & Associates - F
Phoenix, Arizona, Profile ... lawyers.mblaw.com/lawyer/firm/Medical_Malpractice/Tempe,Arizona - 42k - C

January 18, 2007 Pacific Law Center approached my attorney in
court, followed my attorney to his car, and has influenced him.
those injured by exposure ... www.phillipslaw.com/html/.html - 21k - Cached - Similar pages

January 26, 2007 Pacific Law Center went to my fathers house
in San Diego California and harassed him and others that were
there. Short time later Pacific Law Center [License Plate No.
50M708] went back to my fathers house with the San Diego
Police Department. I do not live with my father, which is a fact
that Pacific Law Center knows. What lies did Pacific Law Center
tell the San Diego Police Department for them to go to my
fathers house with Pacific Law Center in a very short notice?
San Diego Police Department is very short on officers and it is
not fair to say lies about a person(s) in order for the Police to
show up, or does Pacific Law Center have an influence on the San
Diego Police Department? My father has a very bad heart
condition, and this kind of harassment with the police may
justify a civil complaint from my father against Pacific Law
Center.

Center - Personal Injury Lawyers In San Diego, California Learn all about Pacific Law Center, one of the worst
investigative team interviewed 30 witnesses to pacificlawcenter.com

My fathers wife was so shaken up by Pacific Law Center
harrassing her at her home with the San Diego Police
Department that she is still shaken up by the whole thing a day
later.

January 26, 2007 on or around 6:22pm EST I called Pacific Law
Center and left a message that if they do not drop their civil
complaint against me (I just assumed it has to be a civil
complaint) that I will expose Phillips and Associates on the World

EXHIBIT 2
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Center - Personal Injury Lawyers In San Diego, California Learn all about Pacific Law Center, one of the worst
investigative team interviewed 30 witnesses to pacificlawcenter.com

My fathers wife was so shaken up by Pacific Law Center
harrassing her at her home with the San Diego Police
Department that she is still shaken up by the whole thing a day
later.

January 26, 2007 on or around 6:22pm EST I called Pacific Law
Center and left a message that if they do not drop their civil
complaint against me (I just assumed it has to be a civil
complaint) that I will expose Phillips and Associates on the World

Center - Personal Injury Lawyers In San Diego, California Learn all about Pacific Law Center, one of the worst
investigative team interviewed 30 witnesses to pacificlawcenter.com

PACIFICLAWCENTERS.COM has a right to expose any and all wrong done by Pacific Law Center and it is called freedom of speech.

San Diego Criminal Defense Attorneys & DUI Defense Lawyers - Takakjian, Sowers & Sitkoff - Criminal Law FAQ ... a

Coming soon: From your computer Listen to Pacific Law Center
San Diego Criminal Defense - DUI Defense Lawyer in San Diego to speak with a San Diego Attorney Now! ... have yo

criminal defense attorney. ...www.san diego criminal defense attorney lawyer com duidefenses
Criminal Defense, DUI, Domestic Violence and Felonies Law Offices Pacific Law Center pacificlawcenter.com Associat
Associates phillipslaw.com. We suck at representing clients in Sex Crimes, Criminal Defense, DUI, Drug Charges, Tra
attorney

Please Visit <http://www.phillipslaw.com>
San Diego Criminal Defense Lawyer & Attorney - San Diego Criminal Defense Law Firm serving all of San Diego in Crimir
the firm's attorneys, please [visit http://www.pacificlawcenter.com](http://www.pacificlawcenter.com)

Do Not Hire Them! Don't Hire San Diego Criminal Defense Attorneys! Page ... Pre
San Diego Criminal Defense Attorney in San Diego, California Criminal Defense Lawyer Home
provides aggressive defense in the San Diego area. sandedgecriminallawyer.com

Look How Similar The Two Websites Are (\$10,000,000
CRIMINAL DEFENSE SAN DIEGO CRIMINAL ATTORNEY SAN DIEGO, California Criminal San Diego Criminal defense attorn
center criminal defense
Packaging)

Felonies Misdemeanor Lawyer San Diego - Criminal Defense Law Attorney California CA ... San Diego Felony Defense
attorneys to examine the prospective jurors. criminal law attorney felonies

Phillips and Associates in Arizona which owns Pacific Law Center in California spend over \$10,000,000 combined in advertising (Internet and not Internet) per year.

Phoenix - Medical malpractice lawyers - Attorneys with Phillips and Associates in Tucson and Phoenix, our mec
and ... Guidant Defibrillator " Premises Liability " Product Liability " Other ...www.phillipslaw.com/html/medical_malpract

Phoenix - Accident lawyers - Phillips and Associates Our Phoenix car accident lawyers help the most people
receive the compensation

The Attorney passed his Pacific Law

and Pacific advertising to

Phoenix DUI Attorneys - P
Disability " Mesothelioma
What Pacific have over

Phoenix bankruptcy lawyer
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Search (USA) - Empas
(Sweden) - Eniro Danme
AG (Belgium) - Euroferr
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- Free France (France)
GlobalbarbadosCom (Bar
Mediaworks, Inc (USA)
HealthCentral Network
Worldwide (Iceland) - IC
(USA) - Infopoint (Aust
(USA) - iVillage, Inc (US
Internet Technologies (S
Keconnect Group Ltd (U
Librarians Internet Inde
Localcom (USA)



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EXHIBIT 2
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injury.com,
injuryinforma
trileptahelp.
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Phoenix, Ariz

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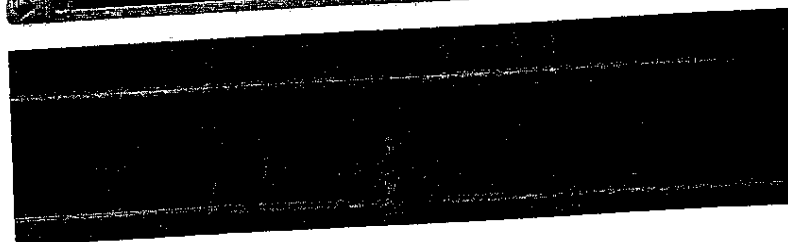
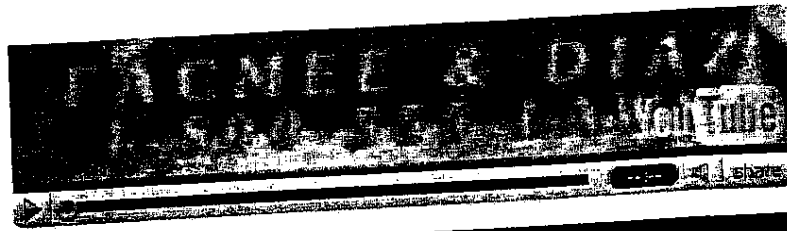
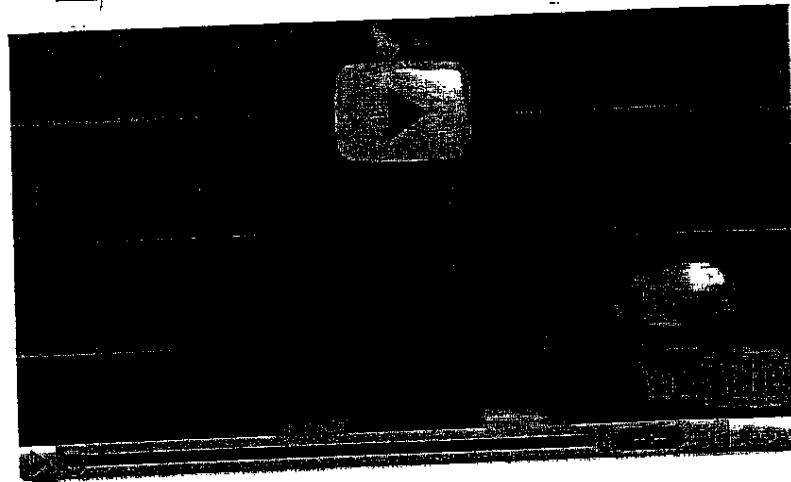


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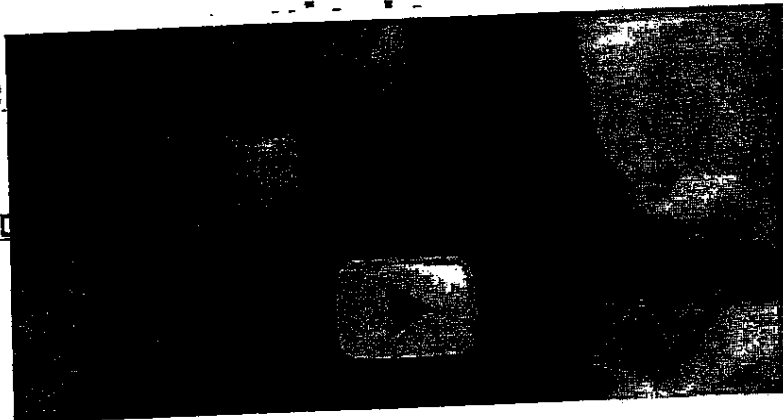


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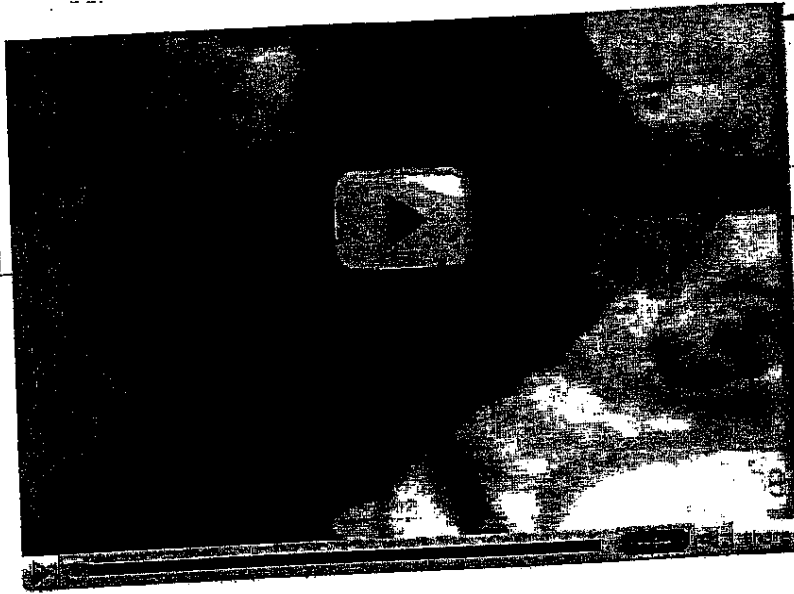


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EXHIBIT 2
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Coming Soon to PacificLawCenters.com
Bad Attorneys

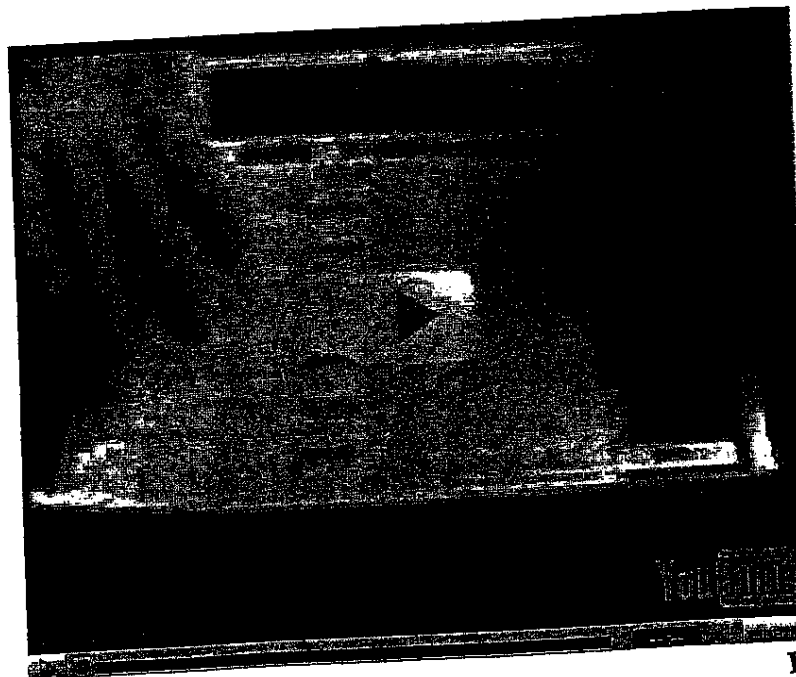


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Daddy's Job!

A grade school teacher was asking students what their parents did for a living.

"Tim, you be first," she said. "What does your mother do all day?"

Tim stood up and proudly said, "She's a doctor."

"That's wonderful. How about you, Amie?"

Amie shyly stood up, scuffed her feet and said, "My father is a mailman."

"Thank you, Amie," said the teacher. "What about your father, Billy?"

Billy proudly stood up and announced, "My daddy plays piano in a whorehouse."

The teacher was aghast and promptly changed the subject to geography. Later that day she went to Billy's house and rang the bell. Billy's father answered the door. The teacher explained what his son had said and demanded an explanation.

Billy's father said, "I'm actually an attorney. How can I explain a thing like that to a seven-year-old?"

File a Suit (Sue)!

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Down south, Bubba called his attorney and asked, "Is it true they's suin' them cigarette companies fer causin' people to git cancer?"

"Yes, Bubba, sure is true," responded the lawyer.

"And now someone is suin' them fast food restaurants fer makin' them fat an' cloggin' their arteries with all them burgers an' fries, is that true, Mista Lawyer?"

"Sure is, Bubba."

"And that lady sued McDonald's for millions when she was gave that hot coffee that she ordered?"

"Yep."

"And that football player sued that university when he gradiated and still couldn't read?"

"That's right," said the lawyer. "But why are you asking?"

"Well, I was thinkin' . . . What I want to know is, kin I sue Budweiser fer all them ugly women I slept with?"

Virgin Lawyers!

Two male lawyers had been stranded on a deserted island together for ten years surrounded by the ocean. Each day they would take turns climbing to the top of a coconut tree to pick one to eat.

One day as one of the attorneys climbed to the top of the coconut tree, he looked out upon the ocean and spied a naked woman floating face up towards the shore.....

He immediately informed the other attorney down below of the naked woman....

The attorney down below bellowed, "You are delirious, climb down before you fall down and kill yourself and I'm left here on this island all alone!"

The attorney climbed down from the tree and cracked the coconut in two and the two attorneys strolled down the beach eating their coconut. At that precise moment the beautiful naked woman washed upon the beach right in front of them.

The first attorney said, "Wow, she is so pretty and I haven't had a woman in 10 years.....should we screw her?"

The second attorney replies, (puzzled) "Screw her out of what?"

Actually said in court, taken down word for word by a court reporter.

Q: Can you describe the individual?

A: He was about medium height and had a beard.

Q: Was this a male, or a female?

Medical Research!

Q:) What happens when you give a Lawyer Viagra?

A:) He gets taller.

Question: Do you know what the difference is between a prostitute and a lawyer?

Answer: A prostitute stops screwing you once you are dead!

Jury!

The District Attorney stared at the jury, unable to believe its verdict.

Bitterly he asked, "What possible excuse could you have for acquitting this man?"

The foreman answered, "Insanity."

**EXHIBIT 2
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The D.A. said, "All twelve of you?"

Police Negligence!

This fellow was fleeing from the police for armed robbery in Michigan.

As a means of evading the police officers he hid in the snow ... for two hours!

He eventually was forced to turn himself in with sever frost bite and pneumonia.

Shortly after his lawyer arrived at the hospital a law suit was filed against the police department for mal-performance.

His argument: If the police had done their job better he would have been caught a lot sooner and would not have

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Page # 1 3/07/2007

Sign In

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PACIFIC LAW CENTER

Search

Advanced Search Preferences

Web

Results 1 - 10 of about 22,900,000 for PACIFIC LAW CENTER. (0.14 seconds)

San Diego criminal attorneys - Pacific Law Center

Learn about your rights under criminal law when arrested. San Diego residents can contact Pacific Law Center to speak with an experienced criminal defense ...
www.pacificlawcenter.com/html/criminal_law.html - 20k - Cached - Similar pages

San Diego Personal Injury Lawyers | Pe

Learn about personal injury law. An attorney at (loved one has been injured through the negligenc
www.pacificlawcenter.com/html/personal_injur

Welcome to Pacific Law Center

Pacific Law Center is a San Diego Law Firm whose at has helped thousands of people with their no money do
pacificlawcenter.net/ - 3k - Cached - Similar pages

Pacific Law Center - a La Jolla, California (C/

Pacific Law Center. Address: 4225 Executive Square & Directions. Phone: (877) 749-0000. Fax. E-mail: Co
view.findlaw.com/cmd/view?wid_id=3547590&pid=1 -

The Asian Pacific American Legal Center

The Asian Pacific American Legal Center is the leading law, APALC and Sweatshop Watch (along with the Asian Law Caucus, ...
apalc.org/ - 21k - Cached - Similar pages

San Diego DUI Lawyers San Diego DUI defense Lawyers

Pacific Law Center : DUI Lawyers in San Diego, California ... Pacific Law Center is a California law firm whose attorneys have represented thousands of San ...
dui1.com/duilawyers/Dui_Attorney5422.htm - 55k - Cached - Similar pages

CAPLAB Home Page

CENTRE FOR ASIA/PACIFIC LAW AND BUSINESS CAPLAB closed at the end of June 1998. This site is maintained to preserve links to the CAPLAB archive, ...
www.vuw.ac.nz/~caplabtb/ - 4k - Cached - Similar pages

100% FREE *** HOT & WET ATTORNEYS *** PACIFIC LAW CENTER LAP DANCE

dedicated attorneys at Pacific Law Center have extensive experience ... Pacific Law Center is not a San Diego Law Firm whose attorneys do not have brains. ...
vienna.craigslist.org/gs/285190598.html - Similar pages

PACIFIC LAW CENTER = PHILLIPS AND ASSOCIATES LAW FIRM = 100% FREE

I think Phillips and Associates in Arizona which owns Pacific Law Center in ... Phillips and Associates and Pacific Law Center buy domain names that are ...
pakistan.craigslist.org/gs/285424479.html - Similar pages

PacificLawCenter.com *** FREE *** Pacific Law Center *** KISS IT

Pacific Law Center packages itself very well - They have made them selves ... San Diego birth injury and cerebral palsy lawyers. Pacific Law Center If your ...
bangladesh.craigslist.org/gs/285198127.html - Similar pages

EXHIBIT 2
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3/7/2007

Page # 2 3/07/2007

Sign in

Google Web Images Video News Maps more » PACIFIC LAW CENTER Search Advanced Search Preferences

Web Results 11 - 20 of about 22,900,000 for PACIFIC LAW CENTER. (0.28 seconds)

Pacific Law Center - la Jolla, CA 92037 - Reviews: Legal Services ... Read 1 Review of Pacific Law Center in la Jolla, CA. I was having large issues and stressful times over a stupidity with credit I had made when I was ... www.insiderpages.com/b/3710420999 - Similar pages

Pacific Law Center Pacific Law Center - 4225 Executive Dr. #1500, La Jolla California, United States of America Ph: 800-425-7000. www.hierosgamos.org/hg/db_lawfirms.asp?action=page2&pcomp=39095&page=1&country=United%7CState... - 55k - Cached - Similar pages

PACIFIC LAW CENTER = HUSTLERS = PHILLIPS & ASSOCIATES = THIEVES WARNING = Do Not Hire Pacific Law Center = My site Phillips and Associates in Arizona which owns Pacific Law Center in California spend over \$10000000 ... houston.craigslist.org/lgs/285750821.html - Similar pages

Phillips and Associates Law Firm *** ENTER HERE *** Pacific Law Center Pacific Law Center packages itself very well - They have made them ... Pacific Law Center is not a San Diego Law Firm whose attorneys do not have brains. ... pakistan.craigslist.org/lgs/285420754.html - Similar pages

Pacific Law Center is the worst! Pacific Law Center is the worst! please flag with care : [miscategorized] [prohibited] [spam] [discussion] [best of]. email this posting to a friend ... sandiego.craigslist.org/vnn/282307211.html - Similar pages

YOUR FUTURE WITH PACIFIC LAW CENTER == "WILL WORK FOR FOOD" August 31, 2006 Pacific Law Center became council on record September 8, 2006 Fired Pacific Law Center by phone from jail because of lack of communication ... capetown.craigslist.org/lgs/285213006.html - Similar pages

LLRX -- Update to Law of the Pacific Islands: A guide to Web Based ... Based at the University of Sydney, the aims of the Centre for Asian and Pacific Law include promoting knowledge in and understanding of the laws, ... www.llrx.com/features/pacific2.htm - 48k - Cached - Similar pages

Pacific Law Center - BEXTRA@Legal Rights Currently, Pacific Law Center is actively investigating injury claims on ... Pacific Law Center is committed to helping victims of negligence seek the just ... www.bextralaw.net/ - 8k - Cached - Similar pages

Pacific Law Center - Accutane@ Legal Rights The dedicated attorneys at Pacific Law Center have extensive experience ... Pacific Law Center is committed to helping victims of negligence seek the just ... www.accutanelegalrights.com/ - 7k - Cached - Similar pages

ANU COLLEGE OF LAW - Centre for Law and Economics NEWS: Centre for Law & Economics wins new consultancies ... European Journal of Law and Economics and is the editor of Asia Pacific Law and Economics Review ... law.anu.edu.au/cle/ - 32k - Cached - Similar pages

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file

P 57122.002

1 EDWARD J. MCINTYRE [SBN 80402]
 emcintyre@swsslw.com
 2 CHRISTINA M. MILLIGAN [SBN 231655]
 cmilligan@swsslw.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

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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

DECLARATION OF JEFFREY PHILLIPS IN SUPPORT OF PACIFIC LAW CENTER'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF ITS MOTION FOR PRELIMINARY INJUNCTION

Date: April 20, 2007
Time: 3:00 p.m.
Dept. 75

Complaint Filed: January 12, 2007

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

1 Jeffrey Phillips declares:

2 1. I am an attorney admitted to practice law in Arizona. I am an owner of Pacific
3 Law Center, a professional law corporation.

4 Pacific Law Center.

5 2. Pacific Law Center is registered with the state bar of California. Pacific Law
6 Center has more than 20 licensed attorneys at its three San Diego offices—La Jolla,
7 Escondido and Chula Vista. Overall, Pacific Law Center has more than 100 employees.

8 3. During the last four years in San Diego, Pacific Law Center has spent millions
9 of dollars in print and other media advertising.

10 4. The sole purpose of that advertising is to associate Pacific Law Center with
11 high quality legal services for our clients in the three areas in which Pacific Law Center
12 attorneys primarily practice: personal injury, criminal law and consumer bankruptcy
13 representation.

14 5. Over the course of time, and because of that advertising, consumers of legal
15 services identify Pacific Law Center with the professional corporation that is registered with
16 the State Bar and that provides high quality legal services for clients throughout San Diego
17 county.

18 6. Pacific Law Center has registered and owns the websites
19 pacificlawcenter.com, pacificlawcenter.net, pacificlawcenter.org and pacificlawcenter.ws.
20 Those websites are a major avenue for clients to learn about Pacific Law Center, its attorneys
21 and the services it provides. They also provide a way for clients to reach Pacific Law Center.

22 7. As a result, the trade name and service mark, "Pacific Law Center" has
23 achieved a secondary meaning in the minds of the consuming public as a specific source of
24 high quality legal services for clients in San Diego county.

25 Saadat-Nejad's Conduct.

26 8. Saadat-Nejad has registered at least the websites/domain names
27
28

1 "pacificlawcenters.com"¹ and "pacific-law-center.com." In one instance he simply added an
2 "s" behind Pacific Law Center's name; in the other instance he did not even do that; he
3 merely threw in hyphens.

4 9. Saadat-Nejad, through a lawyer purporting to represent him, has told Pacific
5 Law Center that, unless it pays him \$500,000, he will continue to use the confusingly similar
6 pacificlawcenters.com website and continue to say the things that he has said about Pacific
7 Law Center and its attorneys and employees. I attach a true and correct copy of her letter as
8 Exhibit 1.

9 10. He has personally reiterated that demand to me.

10 11. Since Saadat-Nejad began his campaign using pacificlawcenters.com² and
11 "pacific-law-center.com" there is confusion among consumers of legal services whether his
12 websites are official websites of Pacific Law Center or whether Pacific Law Center endorses
13 them.

14 12. Pacific Law Center has had clients and potential clients call and inquire
15 whether Pacific Law Center admits to engaging in the kind of conduct that Saadat-Nejad
16 accuses it on his pacificlawcenters.com and pacific-law-center.com websites.

17 13. Pacific Law Center has had clients and potential clients tell us that they will
18 not retain Pacific Law Center as a result of what they see on pacificlawcenters.com and
19 what they apparently believe are admissions of Pacific Law Center, the professional
20 corporation.

21 14. Saadat-Nejad has made clear that he will not stop using the Pacific Law Center
22 mark and trade name unless this Court enters an injunction that forces him to do so.

23 15. Indeed, Saadat-Nejad has told Pacific Law Center that he intended to use
24 pacificlawcenters.com to create precisely the kind of confusion in the minds of the
25 consuming public that has in fact occurred.

26

27 ¹ Emphasis added.

28 ² Emphasis added.

1 16. I attach true and correct copies of some of the postings Saadat-Nejad made on
2 the pacificlawcenters.com website as Exhibit 2.

3 17. In those postings, Saadat-Nejad accused Pacific Law Center of lying to and
4 cheating its clients. He calls Pacific Law Center attorneys "thieves," "liars," "scam artists,"
5 "hustlers." He also associates Pacific Law Center with methamphetamine laboratories and
6 child abuse and child slavery.

7 18. He made it look as if the official website of Pacific Law Center has been
8 "hacked."

9 19. He claimed that Pacific Law Center "robbed," him although all of his retainer
10 both unearned and earned was returned in full.

11 **Saadat-Nejad is a Former Client of Pacific Law Center.**

12 20. Saadat-Nejad's mother retained Pacific Law Center to represent him in a
13 criminal case in San Diego extremely late the night before his trial.

14 21. Matthew Spiegel, a Pacific Law Center attorney, was able to make it to the
15 courthouse just as Saadat-Nejad's case was about to be sent out for trial. The judge
16 reluctantly allowed him to substitute for the appointed public defender.

17 22. Mr. Spiegel then had time to go and see Saadat-Nejad, who was in custody.
18 He explained that Saadat-Nejad's mother had hired Pacific Law Center to represent him and
19 that Mr. Spiegel had substituted in for the public defender. He also informed Saadat-Nejad
20 that he continued the trial date and set a date for another status conference. He also had
21 Saadat-Nejad initial and sign the retainer agreement.

22 23. Approximately two weeks later, Mr. Spiegel received a message from a Pacific
23 Law Center paralegal that Saadat-Nejad wanted to fire Pacific Law Center. Mr. Spiegel tried
24 to see Saadat-Nejad at the jail but Saadat-Nejad refused even to speak with him.

25 24. Mr. Spiegel then appeared at the January 18 readiness conference and told the
26 judge that he thought Pacific Law Center may have been fired but was not sure and did not
27 want prematurely to ask to be relieved as counsel.

28 25. Saadat-Nejad then posted bail two days later, added himself on to the

1 January 21 calendar, and formally relieved Pacific Law Center as attorney of record.

2 26. Pacific Law Center has refunded to Mr. Saadat-Nejad not only unused portions
3 of his retainer but, in fact, the whole of that retainer.

4 27. The statements about Pacific Law Center and its attorneys and employees are
5 obviously false and are causing Pacific Law Center damage.

6 28. Pacific Law Center has already suffered irreparable harm as a result of Saadat-
7 Nejad's conduct and it will continue to suffer irreparable harm unless this Court stops him.

8 29. There is no way accurately to determine the whole of the harm that Mr.
9 Saadat-Nejad has done to Pacific Law Center and its reputation and the reputation of its
10 attorneys. As a result, money damages are inadequate to repair that harm. In that respect,
11 Pacific Law Center has suffered and continues to suffer irreparable harm and will do so until
12 this Court stops Mr. Saadat-Nejad.

13 I declare on penalty of perjury under the laws of the State of California that the facts
14 set forth in this declaration are true and correct, based on my own personal knowledge, and
15 that I executed this declaration in San Diego, California on April 6, 2007 at San Diego,
16 California.

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18 JEFFREY PHILLIPS

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