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3 San Diego, California 92101  
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5 Attorneys for Solomon Ward Seidenwurm &  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

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11 PACIFIC LAW CENTER, a Professional Law  
Corporation; and SOLOMON WARD  
12 SEIDENWURM & SMITH, LLP,

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Plaintiffs,

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v.

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SHAHROKH SAADAT-NEJAD, an  
individual,

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Defendant.

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CASE NO. 07-CV-00460 JLS (POR)

**SOLOMON WARD'S PRE-TRIAL  
DISCLOSURES [FED. R. CIV. P. 26(a)(3)]**

Hon. Janis L. Sammartino

1 Solomon Ward submits the following Pre-Trial Disclosures under Fed. R. Civ. P.  
2 26(a)(3):

3 **Solomon Ward's Witnesses:**

4 Names and addresses of individuals whom Solomon Ward intends to call as  
5 witnesses:

- 6 1. Paul S. Metsch, Esq., c/o Solomon Ward Seidenwurm & Smith, LLP, 401 B  
7 Street, Suite 1200, San Diego, CA 92101. Telephone: (619) 231-0303.
- 8 2. William N. Kammer, Esq., c/o Solomon Ward Seidenwurm & Smith, LLP, 401  
9 B Street, Suite 1200, San Diego, CA 92101. Telephone: (619) 231-0303.
- 10 3. Adam R. Rosenthal, Esq., c/o Solomon Ward Seidenwurm & Smith, LLP, 401 B  
11 Street, Suite 1200, San Diego, CA 92101. Telephone: (619) 231-0303.
- 12 4. Mathiew M. Vafi, c/o Solomon Ward Seidenwurm & Smith, LLP, 401 B Street,  
13 Suite 1200, San Diego, CA 92101. Telephone: (619) 231-0303.
- 14 5. Shahrokh Saadat-Nejad, 3713 Mt. Ashmun Place, San Diego, CA 92111.  
15 Telephone: (646) 225-8213.

16 **Deposition Testimony:**

17 There are no deposition transcripts.

18 **Court Transcripts:**

- 19 1. Reporter's Transcript of *Ex Parte* Motion for Temporary Restraining Order,  
20 dated March 29, 2007.
- 21 2. Reporter's Transcript of Motion/Miscellaneous Hearing Before the Honorable  
22 Larry Alan Burns, dated April 26, 2007.
- 23 3. Reporter's Transcript of Order to Show Cause Hearing, dated July 12, 2007.

24 **Documents and Exhibits:**

25 Documents and things Solomon Ward intends to offer as Exhibits:

EXHIBIT	DESCRIPTION
1.	Service mark and trade name "Solomon Ward Seidenwurm & Smith"

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1	EXHIBIT	DESCRIPTION
2	2.	Service mark and trade name "Solomon Ward"
3	3.	Registration for "swsslaw.com"
4	4.	Registration for "SolomonWard.com"
5	5.	Evidence of internet site "swsslaw.com"
6	6.	Evidence of website "solomonwardsandiego.com"
7	7.	Registration for "Solomonwardlawfirm.com"
8	8.	Registration for "USHostage.com"
9	9.	Website: "Welcome to SolomonWardSanDiego.com"
10	10.	Internet website: "pacificlawcenters.com"
11	11.	Declaration of Shahrokh Saadat-Nejad, dated March 26, 2007 (without exhibits)
12	12.	Saadat-Nejad's fee agreement with Mary Frances Prevost, dated January 15, 2007
13	13.	Letter dated February 1, 2007 from Mary Frances Prevost to Thomas Slattery and Robert Arentz
14	14.	Solomon Ward's complaint: National Arbitration Forum, dated March 21, 2007
15	15.	Internet website: "Free San Diego 100% Free, Warning, DUI Attorney..."
16	16.	Temporary Restraining Order and Order to Show Cause, filed March 29, 2007
17	17.	[Proposed] Temporary Restraining Order and Order to Show Cause, filed March 29, 2007, with Court's handwritten annotations.
18	18.	Evidence of website: "civilcasenumbers.com/2007/05/10/solomonwardswsslawcom.aspx."
19	19.	Evidence of website: "pacificlawyerscenter.com."
20	20.	Evidence of website: "usgovernment courts.com."
21	21.	Evidence of website "sandiegocriminalattorneys.usgovernment.com/2007/05/10/solomonwardpacificlawcenter.aspx."
22	22.	Evidence of website "losangelescountylaws.com/2007/05/11/ solomonwardpacificlawcentersandduilawyers.com."
23	23.	Evidence of website "duisandiegodui.com."
24	24.	Evidence of website "intellegence.com/2007/05/26/solomonwardseidenwurm"

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EXHIBIT	DESCRIPTION
	andsmithsandiegorealestateconstructionlitigationattorneyslawyers.aspx."
25.	Evidence of website: "socommil.com."
26.	Preliminary Injunction filed April 27, 2007
27.	Shahrokh Saadat-Nejad's Response to Alleged Contempt, filed July 6, 2007
28.	Order Following Hearing on Order to Show Cause re Contempt, filed July 16, 2007

DATED: May 19, 2008

Respectfully submitted,  
SOLOMON WARD SEIDENWURM & SMITH, LLP

By: /s/ Edward J. McIntyre  
EDWARD J. MCINTYRE  
Attorneys for Solomon Ward

1 CERTIFICATE OF SERVICE

2 I caused the **SOLOMON WARD'S PRE-TRIAL DISCLOSURES [FED. R. CIV. P.**  
3 **26(a)(3)]** to be served in the following manner:

4 Electronic Mail Notice List

5 The following are those who are currently on the list to receive e-mail notices for this  
6 case.

7 Electronic Mail Notice List

8 Robert F. Clarke, Esq. (SBN 79881)  
9 Pacific Law Center  
10 4225 Executive Square, Suite 1550  
11 La Jolla, CA 92037  
12 Telephone: (888) 789-0123  
13 Facsimile: (800) 718-1825  
14 Attorneys for Pacific Law Center

15 The following party who is not on the list to receive e-mail notices for this case. He  
16 therefore requires manual noticing, via Federal Express:

17 Shahrokh Saadat-Nejad  
18 3713 Mt. Ashmun Place  
19 San Diego, CA 92111  
20 VIA FEDERAL EXPRESS

21 /s/ Edward J. McIntyre  
22 EDWARD J. MCINTYRE