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5 Attorney for Plaintiffs

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

PACIFIC LAW CENTER, a Professional Law
 Corporation: and SOLOMON WARD
 SEIDENWURM AND SMITH LLP,

 Plaintiff,

 v.
 SHAHROKH SAADAT-NEJAD, an individual,

 Defendant,

Civil No: 07-cv-0460-JLS (POR)

**PACIFIC LAW CENTER'S PRE- TRIAL
DISCLOSURES [FED. R. CIV. P.
26(a)(3)]**

Courtroom: 6, Third Floor

Hon. Janis L. Sammartino

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

3 **Pacific Law Center's Witnesses:**

4 Names and addresses of individuals whom Pacific Law Center intends to call as
5 witnesses:

- 6 1. Jeffrey Phillips, Esq., c/o Robert F. Clarke, Esq., Phillips & Associates, 3030 N.
7 Third St., Suite 1100, Phoenix, AZ 85012. Telephone: (602) 258-8900.
- 8 2. Robert Arentz, Esq. c/o Robert F. Clarke, Esq. Phillips & Associates, 3030 N.
9 Third St., Suite 1100, Phoenix, AZ 85012. Telephone (602) 258-8900.
- 10 3. Matthew Spiegel, Esq. c/o Robert F. Clarke, Esq. Phillips & Associates, 3030 N.
11 Third St., Suite 1100, Phoenix, AZ 85012. Telephone (602) 258-8900.
- 12 4. Mary Frances Prevost, Esq. 555 W. Beech St., Suite 500, San Diego, CA 92101.
13 Telephone: (619) 692-9001.

14 Any and all witnesses listed by any other party.

15 **Deposition Testimony:**

16 There are no deposition transcripts.

17 **Court Transcripts**

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

1 **Documents and Exhibits:**

2 Documents and things Pacific Law Center intends to offer as Exhibits:

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EXHIBIT	DESCRIPTION
4 1.	Registration with the State Bar of California for Pacific Law Center
5 2.	Evidence of website pacificlawcenter.com
6 3.	Evidence of website of pacificlawcenter.net
7 4.	Evidence of website pacificlawcenter.org
8 5.	Evidence of website pacificlawcenter.ws
9 6.	Registration for pacificlawcenter.com
10 7.	Registration for pacificlawcenter.net
11 8.	Registration for pacificlawcenter.org
12 9	Registration for pacificlawcenter.ws
13 10.	Evidence of trade name and service mark "Pacific Law Center"
14 11.	Evidence of trade name and service mark "pacificlawcenters.com"
15 12.	Evidence of trade name and service mark "pacific-law-center.com"
16 13.	Registration for "USHOSTAGE.com"
17 14.	Letter dated February 1, 2007 from Mary Frances Prevost to Thomas Slattery and Robert Arentz
18 15.	[Proposed] Temporary Restraining Order and Order to Show Cause, filed March 29, 2007, with Court's handwritten annotations
19 16.	Evidence of website: "civilcasenumbers.com/2007/05/10/solomonwardswsslawcom.aspx."
20 17.	Evidence of website: "pacificlawyerscenter.com."
21 18.	Evidence of website: "usgovernment.courts.com."
22 19.	Evidence of website "duisandiegodui.com"

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1	20.	Evidence of website "sandiegocriminalattorneys.usgovernment.com/2007/05/10/solomonwardpacificlawcenter.aspx."
2	21.	Evidence of website "losangelescountylaw.com/2007/05/11/solomonwardpacificlawcentersandduilawyers.com."
3	22.	Evidence of website "intelligence.com/2007/05/26/SolomonwardseidenwurmandsmithsandiegorealsestateconstructionlitigationAttorneyslawyers.aspx."
4	23.	Evidence of website "socommil.com."
5	24.	Preliminary Injunction filed April 27, 2007
6	25.	Shahrokh Saadat-Nejad's Response to Alleged Contempt, filed July 6, 2007.
7	26.	Order Following Hearing on Order to Show Cause re Contempt, filed July 16, 2007.
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11 Any and all other Document Exhibits filed by other party.

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13 DATED: May 19, 2008

Respectfully submitted,

14 PHILLIPS & ASSOCIATES

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17 By: /s/ Robert F. Clarke
18 ROBERT F. CLARKE
19 Attorney for Pacific Law Center
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1 **CERTIFICATE OF SERVICE**

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

4 **Electronic Mail Notice List**

5 Edward J. McIntyre
6 Solomon Ward Seidenwurm & Smith, LLP
7 401 B. Street, Suite 1200
8 San Diego, CA 92101
9 Telephone: (619)231-0303
Facsimile: (619) 231-4755
Attorneys for Solomon Ward

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

12 Shahrokh Saadat-Nejad
13 3713 Mt. Ashmun Place
14 San Diego, CA 92111

VIA FEDERAL EXPRESS

15 /s/ Robert F. Clarke
16 Robert F. Clarke