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CLERK OF DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY Y. NIX DEPUTY

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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 PACIFIC LAW CENTER, and
12 SOLOMON WARD SEIDERWURM
13 & SMITH

14 Plaintiffs,

15 vs.

16 SHAHROKH SAADAT-NEJAD

17 Defendant.
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CASE No. 07-CV-00460 JLS (POR)

SHAHROKH SAADAT-NEJAD'S
PRE-TRIAL DISCLOSURES

Judge: Janis L. Sammartino

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Defendant Shahrokh Saadat-Nejad respectfully submits the following Pre-Trial Disclosures.

Defendant's Witnesses:

There are no witnesses.

Deposition Testimony:

There are no deposition transcripts.

Documents and Exhibits:

Documents and things Defendant intends to offer as Evidence and as Exhibits:

Attached to this SHAHROKH SAADAT-NEJAD'S PRE-TRIAL DISCLOSURES, labeled as EXHIBIT A, is copy of docket numbers and description's of all filings in this court that Defendant Shahrokh Saadat-Nejad intends to offer as Evidence and as Exhibits (The Court File as a Whole).

Date: MAY 21, 2008



Shahrokh Saadat-Nejad
Defendant

EXHIBIT A

10 PAGES
NUMBERED ON
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**U.S. District Court
Southern District of California (San Diego)
CIVIL DOCKET FOR CASE #: 3:07-cv-00460-JLS-POR**

Pacific Law Center et al v. Saadat-Nejad
Assigned to: Judge Janis L. Sammartino
Referred to: Magistrate Judge Louisa S Porter
Demand: \$75,000
Cause: 15:1051 Trademark Infringement

Date Filed: 03/13/2007
Jury Demand: Plaintiff
Nature of Suit: 840 Trademark
Jurisdiction: Federal Question

Plaintiff

Pacific Law Center
a Professional Law Corporation

represented by **Edward J McIntyre**
Solomon Ward Seidenwurm & Smith,
LLP
401 B Street
Suite 1200
San Diego, CA 92101
(619)231-0303
Fax: (619)231-4755
Email: emcintyre@swsslw.com
TERMINATED: 03/24/2008
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Robert F Clarke
Pacific Law Center
4225 Executive Square
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(888)798-0123
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TERMINATED: 03/24/2008
ATTORNEY TO BE NOTICED

Plaintiff

**Solomon Ward Seidenwurm and
Smith LLP**

represented by **Edward J McIntyre**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

Shahrokh Saadat-Nejad
an individual

represented by **Shahrokh Saadat-Nejad**
3713 Mount Ashmun Place
San Diego, CA 92111
(646)225-8213
PRO SE

Amicus

San Diego ACLU

represented by **John David Blair-Loy**
ACLU of San Diego and Imperial
Counties
PO Box 87131
San Diego, CA 92138
(619)232-2121
Fax: (619)232-0036
Email: dblairloy@aclusandiego.org
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/13/2007	<u>1</u>	COMPLAINT against Shahrokh Saadat-Nejad (Filing fee \$ 350./#135996) , filed by Pacific Law Center, Solomon Ward Seidenwurm and Smith LLP. (Attachments: # <u>1</u> Patent Letter) (Letter and copy of complaint mailed)(rxm) (Entered: 03/14/2007)
03/13/2007	<u>2</u>	Summons Issued as to Shahrokh Saadat-Nejad. (rxm) (Entered: 03/14/2007)
03/21/2007	<u>3</u>	Ex Parte MOTION for Temporary Restraining Order <i>by Solomon Ward and</i> by Pacific Law Center. (Attachments: # <u>1</u> Memo of Points and Authorities in Support of Motion# <u>2</u> Declaration of Thomas Slattery# <u>3</u> Declaration of Edward J. McIntyre)(McIntyre, Edward) (Entered: 03/21/2007)
03/22/2007	<u>4</u>	AFFIDAVIT of Service for Notice of Ex Parte Application, et al. <i>Edward J. McIntyre personally</i> served on Shahrokh Saadat-Nejad on March 22, 2007, filed by Pacific Law Center. (McIntyre, Edward) (Entered: 03/22/2007)
03/22/2007	<u>5</u>	Minute Entry: Judge M. James Lorenz recuses from this case and orders another judge assigned. Judge Larry Alan Burns randomly assigned. New case number 07cv0460-LAB(POR). (jsp) (Entered: 03/22/2007)
03/23/2007	<u>6</u>	ORDER Setting Briefing and Hearing on Plaintiffs' Application for Temporary Restraining Order <u>3</u> ; dft shall serve and file a memorandum responsive to plas' application no later than Monday, March 26, 2007 at

		4:00pm; plas shall serve and file a reply memorandum no later than Wednesday, March 28, 2007 at noon; TRO Hearing set for 3/29/2007 10:00 AM in Courtroom 9 before Judge Larry Alan Burns; counsel for plas shall forthwith give dft telephonic notice of the contents of this Order and shall expeditiously effectuate service of same; Signed by Judge Larry Alan Burns on 3/23/07. (kaj) (Entered: 03/23/2007)
03/23/2007	<u>7</u>	CERTIFICATE of Counsel re <u>6</u> Order Setting Hearing on Motion,, <i>Declaration of Notice</i> by Edward J McIntyre on behalf of all plaintiffs (McIntyre, Edward) (Entered: 03/23/2007)
03/27/2007	<u>8</u>	RESPONSE in Support re <u>3</u> Ex Parte MOTION for Temporary Restraining Order by <i>Solomon Ward and Pacific Law Center</i> filed by Pacific Law Center. (McIntyre, Edward) (Entered: 03/27/2007)
03/28/2007	<u>9</u>	Discrepancy Order by Judge Larry Alan Burns accepting document: Declaration of Shahrokh Saadat-Nejad and response to all ex parte in all court cases listed from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule. No proof of service. Dft to file Proof of Service forthwith. Signed by Judge Larry Alan Burns on 3/27/2007. (jah) (Entered: 03/28/2007)
03/28/2007	<u>10</u>	DECLARATION of Shahrokh Saadat-Nejad and Response to All Ex Parte in All Court Cases Listed by Defendant Shahrokh Saadat-Nejad. NUNC PRO TUNC 3/26/2007 (Attachments: # <u>1</u> Declaration Part 2)(jah) (Entered: 03/28/2007)
03/29/2007	<u>11</u>	AFFIDAVIT of Service for Summons and Complaint <i>Pacific Law Center and Solomon Ward Seidenwurm & Smith</i> served on Shahrokh Saadat-Nejad on March 14, 2007, filed by Pacific Law Center. (McIntyre, Edward) (Entered: 03/29/2007)
03/29/2007	<u>12</u>	Minute Entry for proceedings held before Judge Larry Alan Burns : Motion Hearing held on 3/29/2007. Plaintiff's Ex Parte MOTION for Temporary Restraining Order <u>3</u> is granted in part and denied in part. Court to issue written order. Matter is referred to Magistrate Judge Porter for a settlement conference. Motion hearing on preliminary injunction, if applicable, shall be set for 4/26/07 at 12:00 pm ; plaintiff's motion to be efiled by 4/16/07 before 5:00 pm; defendant's written opposition to be filed with the Clerk's Office by 4/23/07 before 5:00 pm (Court Reporter Eva Oemick / CRD: A. Ramos / Plaintiff Attorneys: Edward McIntyre & Christina Milligan / <i>Pro Se</i> Defendant: Shahrokh Saadat-Nejad) (acr) (Entered: 03/29/2007)
03/29/2007	<u>13</u>	ORDER, granting <u>3</u> Ex Parte MOTION for Temporary Restraining Order by <i>Solomon Ward and</i> filed by Pacific Law Center,. Settlement Conference set for 4/11/2007 10:00 AM in Courtroom H before Magistrate Judge Louisa S Porter. Preliminary Injunction Hearing set for 4/26/2007 12:00 PM in Courtroom 9 before Judge Larry Alan Burns. Signed by Judge Larry Alan Burns on 03/29/07. (joeh,) (Entered: 03/29/2007)
03/29/2007	<u>14</u>	TEMPORARY RESTRAINING ORDER. Signed by Judge Larry Alan Burns on 03/29/07. (joeh,) (Entered: 03/29/2007)
04/02/2007	<u>15</u>	ORDER; the court granted the application for temporary restraining order

		and separately enters the TRO; Magistrate Judge Porter set a settlement conference for Wednesday, April 11, 2007 at 10:00am in Courtroom H; no later than noon on April 9, 2007, the parties shall lodge in Magistrate Judge Porter's chambers their Confidential Settlement Briefs; Preliminary Injunction Hearing set for Thursday, April 26, 2007 at noon before Judge Larry A. Burns; plas supporting brief due on or before April 16, 2007; dft's reply/opposition due no later than April 23, 2007 at 5:00pm . Signed by Judge Larry Alan Burns on 3/29/07. (kaj) (Entered: 04/03/2007)
04/03/2007	<u>16</u>	AFFIDAVIT of Service for Order Following Hearing on Plaintiffs' Application for a TRO <i>Pacific Law Center and Solomon Ward</i> served on Shahrokh Saadat-Nejad on April 3, 2007, filed by Pacific Law Center. (McIntyre, Edward) (Entered: 04/03/2007)
04/11/2007	<u>17</u>	ORDER; settlement conf held on 4/11/07; Settlement Conference set for 4/16/2007 01:30 PM in Courtroom H before Magistrate Judge Louisa S Porter. Signed by Magistrate Judge Louisa S Porter on 4/11/07. (kaj) (Entered: 04/12/2007)
04/11/2007	<u>19</u>	Minute Entry for proceedings held before Judge Louisa S Porter : Settlement Conference held on 4/11/2007. Order to follow. (Plaintiff Attorney Edward McIntyre).(Defendant Attorney Shahrokh Saadat-Nejad). (rfm,) (Entered: 04/17/2007)
04/16/2007	<u>18</u>	Supplemental MOTION for Preliminary Injunction by Pacific Law Center. (McIntyre, Edward) (Entered: 04/16/2007)
04/16/2007	<u>20</u>	Minute Entry for proceedings held before Judge Louisa S Porter : Settlement Conference held on 4/16/2007. Order to follow. (Plaintiff Attorney Edward McIntyre).(Defendant Attorney Shahrokh Saadat-Nejad). (rfm,) (Entered: 04/17/2007)
04/17/2007	<u>21</u>	ORDER; telephonic settlement conf held on 4/16/07; Preliminary Injunction Hearing set for 4/26/2007 12:00 PM in Courtroom 9 before Judge Larry Alan Burns; Signed by Magistrate Judge Louisa S Porter on 4/17/07. (kaj) (Entered: 04/18/2007)
04/18/2007	<u>22</u>	RESPONSE in Support re <u>18</u> Supplemental MOTION for Preliminary Injunction <i>Errata to Supplemental Memorandum</i> filed by Pacific Law Center. (McIntyre, Edward) (Entered: 04/18/2007)
04/25/2007	<u>23</u>	Discrepancy Order by Judge Larry Alan Burns accepting document: response to pla's falsified and manufactured documents from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule 7.1 or 47.1; other: missing proof of service; filing authorized by docket #15, dft to forthwith serve and file proof of service; Signed by Judge Larry Alan Burns on 4/23/07. (kaj) (Entered: 04/25/2007)
04/25/2007	<u>24</u>	RESPONSE re <u>18</u> Supplemental MOTION for Preliminary Injunction filed by Shahrokh Saadat-Nejad (nunc pro tunc 4/23/07) (kaj) (Entered: 04/25/2007)
04/27/2007	<u>25</u>	Minute Entry for proceedings held before Judge Larry Alan Burns: Motion

		Hearing held on 4/27/2007. <u>18</u> Supplemental MOTION for Preliminary Injunction filed by Pacific Law Center held. Court to issued order.(Court Reporter Frank Rangus).(Plaintiff Attorney Edward McIntyre).(Defendant Attorney Shahrokh Saadt-Nejad). (tlw) (Entered: 04/27/2007)
04/27/2007	<u>26</u>	PRELIMINARY INJUNCTION; plaintiffs' counsel shall ensure service of this Order on Saadat-Nejad, and all other court documents, in the manner the parties have agreed on the record; Signed by Judge Larry Alan Burns on 4/27/07. (kaj) (Entered: 04/30/2007)
04/30/2007	<u>27</u>	<i>Declaration of Service on Shahrokh Saadat-Nejad</i> re <u>26</u> by Pacific Law Center. (McIntyre, Edward) Modified on 5/1/2007 to correct text (kaj). (Entered: 04/30/2007)
05/08/2007	<u>28</u>	Request for Entry of Clerks Default against Shahrokh Saadat-Nejad. (Attachments: # <u>1</u> Declaration of Edward J. McIntyre# <u>2</u> [Proposed] Default by Clerk)(McIntyre, Edward) (Entered: 05/08/2007)
05/09/2007	<u>29</u>	SET ASIDE PER ORDER <u>32</u> Clerk's ENTRY OF DEFAULT as to Shahrokh Saadat-Nejad (kaj) Modified on 5/29/2007 to reflect default is set aside (jpp,). (Entered: 05/09/2007)
05/14/2007	<u>30</u>	Document stricken from the record per discrepancy order by Judge Burns on 5/15/07 <u>31</u> (kaj) Modified on 5/16/2007 to strike document (kaj). (Entered: 05/15/2007)
05/15/2007	<u>31</u>	Discrepancy Order by Judge Larry Alan Burns rejecting document: Response & Oppose Default & Motion from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule 5.1; other: no indication of ex parte request for relief from default or showing why dft is purportedly not in default; the exhibits are irrelevant to the default issue; argument regarding detail or merits of other cases is irrelevant to the default issue in this case; extraneous argument fails to show good cause for relief from the default; no motion to dismiss hearing was requested and none will be granted while defendant remains in default; the document is rejected, the clerk is ordered to strike the document from the record; Signed by Judge Larry Alan Burns on 5/15/07. (kaj) (Entered: 05/16/2007)
05/25/2007	<u>32</u>	ORDER construing filing and granting Defendant's request for relief from Default. Shahrokh Saadat-Nejad answer due 6/11/2007.. Signed by Judge Larry Alan Burns on 05/25/07. (jpp,) (Entered: 05/29/2007)
05/29/2007	<u>33</u>	Discrepancy Order by Judge Larry Alan Burns accepting document: Construed as: request for relief from default from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule other: Clerk's Default Entered. Signed by Judge Larry Alan Burns on 05/24/07. (jpp,) (Entered: 05/29/2007)
05/29/2007	<u>34</u>	REQUEST (filed as an answer) by Shahrokh Saadat-Nejad for relief from default. NUNC PRO TUNC 05/21/07.(jpp,) (Entered: 05/29/2007)
06/11/2007	<u>35</u>	NOTICE (filed as an answer) t/w Declaration of Service by Shahrokh Saadat-Nejad (jpp,) (Entered: 06/11/2007)

06/19/2007	<u>36</u>	Ex Parte MOTION for Contempt <i>for Order to Show Cause Concerning Saadat-Nejad's Contempt</i> by Pacific Law Center. (Attachments: # <u>1</u> Declaration of Edward J. McIntyre in Support of OSC re Contempt) (McIntyre, Edward) (Entered: 06/19/2007)
06/19/2007	<u>37</u>	Order Granting <u>36</u> Ex Parte Application and ORDER TO SHOW CAUSE why defendant Shahrok Saadat-Nejad should not be held in contempt of this Court's 04/26/07 Preliminary Injunction Order. Order to Show Cause Hearing set for 7/12/2007 12:00 PM in Courtroom 9 before Judge Larry Alan Burns. Plaintiff shall file their papers in support by 06/20/07. Saadat-Nejad may file responsive papers by 7/6/2007. Plaintiffs may file a reply by 7/9/2007. Signed by Judge Larry Alan Burns on 06/19/07. (jcj) (Entered: 06/19/2007)
06/19/2007	<u>38</u>	AFFIDAVIT re <u>37</u> Order to Show Cause, Terminate Motions, Set Hearings,, <i>Affidavit of Service of Order and Ex Parte Papers</i> by Plaintiff Pacific Law Center. (McIntyre, Edward) (Entered: 06/19/2007)
06/20/2007	<u>39</u>	MOTION for Contempt <i>re This Court's April 26, 2007 Preliminary Injunction</i> by Pacific Law Center. (Attachments: # <u>1</u> Declaration of Edward J. McIntyre in Support of Order to Show Cause re Contempt# <u>2</u> Exhibit Notice of Lodgment of Exhibits)(McIntyre, Edward) (Entered: 06/20/2007)
07/06/2007	<u>41</u>	REPLY re <u>37</u> Order to Show Cause, filed by Shahrokh Saadat-Nejad. (vrp) (mam). (Entered: 07/09/2007)
07/09/2007	<u>40</u>	REPLY re <u>39</u> MOTION for Contempt <i>re This Court's April 26, 2007 Preliminary Injunction</i> filed by Pacific Law Center. (McIntyre, Edward) (mam). (Entered: 07/09/2007)
07/12/2007	<u>42</u>	Minute Entry for proceedings held before Judge Larry Alan Burns : Show Cause Hearing held on 7/12/2007. Motion for contempt re: court's 4/26/07 preliminary injunction - granted. Court finds the dft in civil contempt of the preliminary injunction. Court orders the dft remanded into custody. Court orders dft detained without bail. Abstract to USM. Further Status Conference set for 7/25/2007 12:15 PM in Courtroom 9 before Judge Larry Alan Burns. (Court Reporter EVA OEMICK).(Plaintiff Attorney Edward McIntyre and Thomas Slattery).(Defendant Attorney Shahrokh Saadat-Nejad). (tlw) (Entered: 07/13/2007)
07/12/2007	<u>44</u>	ABSTRACT OF ORDER remanding defendant for civil contempt. No Bail. Abstract issued to USM.(vrp)(bar). (Entered: 07/17/2007)
07/16/2007	<u>43</u>	ORDER following hearing on Order to Show Cause re Contempt, granting <u>39</u> Motion for Contempt. Signed by Judge Larry Alan Burns on 7/13/07. Saadat-Nejad shall remain in custody until the next scheduled hearing in this matter, set for 7/25/07 at 12:15PM before Judge Larry A. Burns. (vrp)(bar). (Entered: 07/16/2007)
07/17/2007	<u>45</u>	TRANSCRIPT of Motion/Miscellaneous Hearing held on 04/26/2007 before Judge Larry Alan Burns. Court Reporter: Frank J. Rangus. (mkz) (Entered: 07/18/2007)

07/23/2007	<u>46</u>	Amicus Curiae APPEARANCE entered by John David Blair-Loy on behalf of San Diego ACLU. (Attachments: # 1 Exhibit BRIEF OF AMICUS CURIAE ACLU OF SAN DIEGO & IMPERIAL COUNTIES)(Blair-Loy, John) (Entered: 07/23/2007)
07/24/2007	<u>47</u>	Minute Entry for proceedings held before Judge Larry Alan Burns: The American Civil Liberties Union of San Diego & Imperial Counties has applied to the Court for leave to file a brief in amicus curiae associated with civil contempt proceedings in this matter. The <u>46</u> Application is Granted, and the brief is accepted for filing and consideration at the 07/25/07 hearing. (jcj) (Entered: 07/24/2007)
07/24/2007	<u>48</u>	DECLARATION of <i>Edward J. McIntyre</i> by Plaintiff Pacific Law Center. (McIntyre, Edward) (Entered: 07/24/2007)
07/25/2007	<u>49</u>	Abstract of Order. Defendant be released from custody. (jcj) (Entered: 07/27/2007)
07/25/2007	<u>50</u>	Minute Entry for proceedings held before Judge Larry Alan Burns : Status Conference held on 7/25/2007. Court orders the dft released from custody. Abstract to USM. Court to issue order.(Court Reporter EVA OEMICK). (Plaintiff Attorney Edward McIntyre) (Attorney: John David Blair-Loy). (Defendant Shahrokh Saadat-Nejad). (tlw) (Entered: 07/30/2007)
07/27/2007	<u>51</u>	ORDER following status hearing of 7/25/07, purging civil contempt, and setting case management conference. Case Management Conference set for 8/29/2007 01:30 PM in Courtroom H before Magistrate Judge Louisa S Porter. Signed by Judge Larry Alan Burns on 7/25/07. (vrp)(bar). (Entered: 07/30/2007)
08/29/2007	<u>52</u>	Minute Entry for proceedings held before Judge Louisa S Porter : Case Management Conference held on 8/29/2007. Rule 16 dates issued. Order to follow. (Plaintiff Attorney Edward McIntyre).(Defendant Attorney Shahrokh Saadat-Nejad). (rfm) (Entered: 09/04/2007)
09/04/2007	<u>53</u>	Case Management ORDER regulating Discovery and other Pretrial proceedings: On 8/29/07, the Court held a Case Management Conference. All Discovery shall be completed on or before 1/4/08. All motions shall be <i>filed</i> on or before 2/4/08. Pretrial Disclosures shall be prepared, served and lodged with the Clerk of the Court on or before 6/2/08. The Final Pretrial Conference is set for 6/9/2008 10:45 AM in Courtroom 9 before Judge Larry Alan Burns. The Proposed final pretrial conference order is to be served and lodged with the Clerk's Office on or before 6/2/08. Signed by Judge Louisa S Porter on 9/4/07. (vrp) Modified on 9/5/2007 to correct hearing date (vrp) (bar). (Entered: 09/04/2007)
10/02/2007	<u>54</u>	MINUTE ORDER REASSIGNING CASE. Case reassigned to Judge Janis Sammartino for all further proceedings. Case No. 07CV0460-JLS(POR). Judge Larry Alan Burns no longer assigned to caseFinal Pretrial Conference set for 6/9/2008 10:45 AM in Courtroom 6 before Janis Sammartino. (nsp) (Entered: 10/02/2007)
11/15/2007	<u>55</u>	MOTION for Permanent Injunction by Pacific Law Center. (Attachments: #

		<u>1</u> Memo of Points and Authorities in Support of Permanent Injunction# <u>2</u> Declaration of Edward J. McIntyre in Support of Permanent Injunction) (McIntyre, Edward) (Entered: 11/15/2007)
03/06/2008	<u>56</u>	ORDER Scheduling Settlement Conference: A Settlement Conference will be held on 3/17/2008 at 03:30 PM in Courtroom H before Magistrate Judge Louisa S Porter. Signed by Judge Louisa S Porter on 03/06/08. (mkz) (av1,). (Entered: 03/06/2008)
03/13/2008	<u>57</u>	Discrepancy Order by Judge Janis L. Sammartino accepting document: Response and Opposition from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule 7.1: Missing Table of Contents and Other: No Proof of Service. Signed by Judge Janis L. Sammartino on 03/13/08. (mkz) (av1,). (Entered: 03/14/2008)
03/13/2008	<u>58</u>	RESPONSE in Opposition re <u>55</u> MOTION for Permanent Injunction filed by Shahrokh Saadat-Nejad. NUNC PRO TUNC 3/13/08 (mkz) (Entered: 03/14/2008)
03/17/2008	<u>59</u>	MOTION to Substitute Attorney by Pacific Law Center. (Spears, Alan) Modified on 3/19/2008, atty contacted re proposed order (mkz). (mkz). (Entered: 03/17/2008)
03/17/2008	<u>62</u>	Minute Entry for proceedings held before Judge Louisa S Porter : Settlement Conference held on 3/17/2008.(Plaintiff Attorney Edward McIntyre). (Defendant Attorney Shahrokh Saadat-Nejad). (rfm) (Entered: 04/02/2008)
03/21/2008	<u>60</u>	REPLY to Response to Motion re <u>55</u> MOTION for Permanent Injunction filed by Solomon Ward Seidenwurm and Smith LLP. (McIntyre, Edward) (mkz). (mkz). (Entered: 03/21/2008)
03/24/2008	<u>61</u>	ORDER Denying Plaintiffs' <u>55</u> Motion for Permanent Injunction Without Prejudice; Requesting Plaintiffs to Show Cause as to Why this Court Should not Abstain and Stay these Proceedings due to Parallel State Court Proceedings; and Granting Plaintiffs' <u>59</u> Motion to Substitution of Attorney: Plaintiff shall file a response to this Order by 4/25/08. Added attorney Robert F Clarke for Pacific Law Center, Attorney Edward J McIntyre terminated as counsel for Pacific Law Center. The Court vacates the 3/28/08 hearing on Plaintiffs' motion for a permanent injunction. Signed by Judge Janis L. Sammartino on 03/24/08. (mkz) (av1,). (Entered: 03/24/2008)
04/08/2008	<u>63</u>	Discrepancy Order by Judge Janis L. Sammartino accepting document: Writ of Mandamus from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule Other: Supplemental Documents require Court Order. Signed by Judge Janis L. Sammartino on 04/08/08. (mkz) (Entered: 04/09/2008)
04/08/2008	<u>64</u>	MOTION for Writ of Mandamus by Shahrokh Saadat-Nejad. (Attachments: # <u>1</u> Part 2 of Motion) NUNC PRO TUNC 3/27/08(mkz) (Entered: 04/09/2008)
04/09/2008	<u>65</u>	ORDER Denying Defendant's <u>64</u> Motion for "Writ of Mandamus": Defendant requests that the Court: (1) order Plaintiffs to provide him a copy of his 8/3/06 retainer with Pacific Law Center, and (2) send the federal "court


		file" to Judge Richard Strauss who is presider over the parallel state court case against Defendant. The Court denies Defendant's first request as premature because he has failed to show that Plaintiffs have failed to comply with any particular discovery request under Rule 34 of the FRCP. The Court also denies Defendant's second request because there is no legal basis for it. Signed by Judge Janis L. Sammartino on 04/09/08. (mkz) (Entered: 04/09/2008)
04/24/2008	<u>66</u>	REPLY re <u>61</u> Order on Motion for Permanent Injunction, Order on Motion to Substitute Attorney, <i>Order Why This Court Should Not Abstain and Stay These Proceedings</i> filed by Solomon Ward Seidenwurm and Smith LLP. (Attachments: # <u>1</u> Exhibit Notice of Lodgment of Exhibits)(McIntyre, Edward) (mkz). (Entered: 04/24/2008)
04/25/2008	<u>67</u>	RESPONSE TO ORDER TO SHOW CAUSE by Pacific Law Center. (Clarke, Robert) (mkz). (Entered: 04/25/2008)
04/25/2008	<u>68</u>	NOTICE by Pacific Law Center re <u>67</u> Response to Order to Show Cause (Attachments: # <u>1</u> Exhibit Request for Dismissal, # <u>2</u> Exhibit Attachment 1, # <u>3</u> Exhibit Attachment 2, # <u>4</u> Exhibit Attachment 3, # <u>5</u> Exhibit Attachment 4, # <u>6</u> Exhibit Attachment 4, # <u>7</u> Exhibit Attachment 6, # <u>8</u> Exhibit Attachment 7, # <u>9</u> Exhibit Attachment 8, # <u>10</u> Memo of Points and Authorities Attachment 9, # <u>11</u> Exhibit Attachment 10, # <u>12</u> Exhibit Attachment 11, # <u>13</u> Exhibit Attachment 12, # <u>14</u> Exhibit Attachment 13, # <u>15</u> Exhibit Attachment 14, # <u>16</u> Exhibit Attachment 15, # <u>17</u> Exhibit Attachment 16, # <u>18</u> Exhibit Attachment 18, # <u>19</u> Exhibit Attachment 18, # <u>20</u> Exhibit Attachment 19, # <u>21</u> Exhibit Attachment 20, # <u>22</u> Exhibit Attachment 21, # <u>23</u> Exhibit Attachment 22, # <u>24</u> Exhibit Attachment 23, # <u>25</u> Exhibit Attachment 24, # <u>26</u> Exhibit Attachment 25, # <u>27</u> Exhibit Attachment 26, # <u>28</u> Exhibit Attachment 27, # <u>29</u> Exhibit Attachment 28, # <u>30</u> Exhibit Attachment 29, # <u>31</u> Exhibit Attachment 30, # <u>32</u> Exhibit Attachment 31, # <u>33</u> Exhibit Attachment 32, # <u>34</u> Exhibit Attachment 33, # <u>35</u> Exhibit Attachment 34, # <u>36</u> Exhibit Attachment 35, # <u>37</u> Exhibit Attachment 36, # <u>38</u> Exhibit Attachment 37, # <u>39</u> Exhibit Attachment 38, # <u>40</u> Exhibit Attachment 39, # <u>41</u> Exhibit Attachment 40, # <u>42</u> Exhibit Attachment 41, # <u>43</u> Exhibit Attachment 42, # <u>44</u> Exhibit Attachment 43, # <u>45</u> Exhibit Attachment 44, # <u>46</u> Exhibit Attachment 45, # <u>47</u> Exhibit Attachment 46, # <u>48</u> Exhibit Attachment 48, # <u>49</u> Exhibit Attachment 49, # <u>50</u> Exhibit Attachment 50, # <u>51</u> Exhibit Attachment 51, # <u>52</u> Declaration Declaration of Tatiana Ganuza)(Clarke, Robert) (mkz). (Entered: 04/25/2008)
04/25/2008	<u>69</u>	DECLARATION re <u>68</u> Notice, <u>67</u> Response to Order to Show Cause <i>Proof of Service</i> by Plaintiff Pacific Law Center. (Clarke, Robert) (mkz). (Entered: 04/25/2008)
05/05/2008	<u>70</u>	Discrepancy Order by Judge Janis L. Sammartino accepting document: Reply from Defendant Shahrokh Saadat-Nejad, non-compliance with local rule Other: No Provision for reply. Signed by Judge Janis L. Sammartino on 05/05/08. (mkz) (Entered: 05/06/2008)
05/05/2008	<u>71</u>	REPLY re <u>67</u> Response to Order to Show Cause filed by Shahrokh Saadat-

		Nejad. (mkz) Modified on 5/6/2008 to indicate: NUNC PRO TUNC 4/30/08 (mkz). (Entered: 05/06/2008)
05/14/2008	<u>72</u>	Minute Entry : On Court's own motion, Final Pretrial Conference reset from 6/9/08 to 6/12/2008 01:30 PM before Judge Janis L. Sammartino (df/acr) (Entered: 05/14/2008)
05/19/2008	<u>73</u>	NOTICE <i>Solomon Ward's Pre-Trial Disclosures [Fed. R. Civ. P. 26(a)(3)]</i> (McIntyre, Edward) (Entered: 05/19/2008)
05/19/2008	<u>74</u>	NOTICE <i>Pacific Law Center's Pre- Trial Disclosures pursuant to Fed. R. Civ. P. 26(a)(3)</i> (Clarke, Robert) (Entered: 05/19/2008)

PROOF OF SERVICE

I SHAHROKH SAADAT-NEJAD HAVE SERVED DOCUMENT SHAHROKH SAADAT-NEJAD'S PRE-TRIAL DISCLOSURES BY ELECTRONIC EMAIL TO THE PLAINTIFFS PACIFIC LAW CENTER, AND SOLOMON WARD SEIDENWURM & SMITH ON MAY 21, 2008.

DATE: MAY 21, 2008


DEFENDANT
SHAHROKH SAADAT-NEJAD