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5 Attorney for Plaintiffs

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**UNITED STATES DISTRICT COURT**

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**SOUTHERN DISTRICT OF CALIFORNIA**

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

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

12 Plaintiff,

**PACIFIC LAW CENTER'S ADOPTION  
 OF SOLOMON WARD'S CONTENTION  
 OF FACT AND LAW AND  
 SUPPLEMENTATION RE:  
 ADDITIONAL FACTS REGARDING  
 PACIFIC LAW CENTER**

13 v.

14 SHAHROKH SAADAT-NEJAD, an individual,

**Courtroom: 6, Third Floor**

15 Defendant,

**Hon. Janis L. Sammartino**

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17 Pacific Law Center through counsel undersigned hereby adopts and accepts Solomon  
 18 Ward Seidenwurm and Smith's Contention of Fact and Law and incorporates same as though  
 19 fully set forth herein. Pacific Law Center provides further supplementation re: Contention of  
 20 Fact and Law regarding Pacific Law Center.

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**SUPPLEMENT OF CONTENTIONS OF FACT**

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23 Most, if not all, of the issues of fact are not in dispute or are indisputable.

24 **Pacific Law Center.**

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1 Pacific law Center is registered with the state bar of California. Pacific Law Center has  
2 more than 20 licensed attorneys at its three San Diego offices- Law Jolla, Escondido and Chula  
3 Vista. Overall, Pacific Law Center has more than 100 employees.

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

6 The sole purpose of that advertising is to associate Pacific Law Center with high quality  
7 legal services for our clients in the three areas in which Pacific Law Center attorneys primarily  
8 practice: personal injury, criminal law and consumer bankruptcy representation.  
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10 Over the course of time, and because of that advertising, consumers of legal services  
11 identify Pacific law Center with the professional corporation that is registered with the state  
12 Bar and that provides high quality legal services for clients throughout San Diego County.  
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14 Pacific Law Center has registered and owns the websites pacificlawcenter.com,  
15 pacificlawcenter.net, pacificlawcenter.org and pacificlawcenter.ws. Those websites are a  
16 major avenue for clients to learn about Pacific Law Center, its attorneys and the services it  
17 provides. They also provide a way for clients to reach Pacific Law Center.

18 As a result, the trade name and service mark, "Pacific Law Center" has achieved a  
19 secondary meaning in the minds of the consuming public as a specific source of high quality  
20 legal services for clients in San Diego County.  
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22 DATED this 28<sup>th</sup> day of May, 2008  
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RESPECTFULLY SUBMITTED

/s/ Robert F. Clarke  
Robert F. Clarke, Esq.  
Attorney for Plaintiff  
Pacific Law Center

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1 **CERTIFICATE OF SERVICE**

2 I caused the:

3 **(1) PACIFIC LAW CENTER'S ADOPTION OF SOLOMON WARD'S**

4 **CONTENTION OF FACTS AND LAW AND SUPPLEMENTATION RE:**

5 **ADDITIONAL FACTS REGARDING PACIFIC LAW CENTER;**

6 **(2) PACIFIC LAW CENTER'S WITNESS LIST; AND**

7 **(3) PACIFIC LAW CENTER'S EXHIBIT LIST to be served in the following**

8 mannter:

9 Electronic Mail Notice List

10 The following are those who are currently on the list to receive e- mail notices for this  
11 case:

12 Electronic Mail Notice List

13 **NONE.**

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

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

20 /s/ Robert F. Clarke  
21 Robert F. Clarke