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SEIDENWURM & SMITH, LLP
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9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
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12 PACIFIC LAW CENTER, A Professional
Corporation and SOLOMON WARD
13 SEIDENWURM & SMITH, LLP.,

14 Plaintiff,

15 v.

16 SHAHROKH SAADAT-NEJAD,

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

**DECLARATION OF MICHAEL M.
VASSEGHI IN SUPPORT OF SOLOMON
WARD SEIDENWURM AND SMITH'S
BRIEF IN SUPPORT OF ORDER
DIRECTING PARTIES TO SHOW CAUSE
AS TO WHY SUMMARY JUDGMENT
SHOULD NOT BE ENTERED**

Date: To Be Determined
Time: To Be Determined
Courtroom: 6

Hon. Janis L. Sammartino

1 I, Michael M. Vasseghi, declare as follows:

2 1. I am an attorney licensed to practice before the Courts of the State of
3 California and before this Court. I am an associate with the law firm of Solomon Ward
4 Seidenwurm & Smith, the plaintiff in the above-entitled action. If called to do so, I could
5 testify competently and of my own personal knowledge to the matters set forth herein.

6 2. On July 1, 2008, I contacted Mr. Saadat-Nejad to ask him to agree to a
7 permanent injunction. I also invited him to come our office at Solomon Ward to discuss this
8 matter further. Mr. Saadat-Nejad declined the invitation.

9 3. During our phone conversation, Mr. Saadat-Nejad stated that he would enter
10 into such a stipulation. He did not ask for compensation in exchange for signing the
11 stipulation for the permanent injunction, but he wanted to be compensated for the harms
12 that Solomon Ward had caused him during the pendency of this litigation, including causing
13 him to go to jail and for filing falsified documents.

14 4. I asked Mr. Saadat-Nejad how much money he thought he was entitled to. He
15 declined to provide an amount, but he said that the amount was for "you [Solomon Ward] to
16 figure out."

17 5. On June 27, 2008 I conducted an online search using the Google search
18 engine. I found eight different web sites that appeared to be registered and maintained by
19 Mr. Saadat-Nejad. True and correct copies of the relevant portions of those web sites are
20 lodged with the Court as Exhibits 1 though 8 to the Notice of Lodgment filed concurrently
21 herewith.

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6. A true, correct and complete copy of the transcript of the June 16, 2008 pretrial hearing is lodged with the Court as Exhibit 9 to the Notice of Lodgment filed concurrently herewith.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct from my own personal knowledge and that I executed this declaration on July 25, 2008, at San Diego, California.


MICHAEL M. VASSEGI

1 CERTIFICATE OF SERVICE

2 I caused the **DECLARATION OF MICHAEL M. VASSEGHI IN SUPPORT OF**
3 **SOLOMON WARD SEIDENWURM AND SMITH'S BRIEF IN SUPPORT OF ORDER**
4 **DIRECTING PARTIES TO SHOW CAUSE AS TO WHY SUMMARY JUDGMENT SHOULD**
5 **NOT BE ENTERED** to be served in the following manner:

6 Electronic Mail Notice List

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

9 Electronic Mail Notice List

10 Robert F. Clarke, Esq. (SBN 79881)
11 Phillips & Associates
12 3030 N. Third Street, Suite 1100
13 Phoenix, AZ 85012
14 Telephone: (602) 258-8900
15 Facsimile: (602) 288-1671
16 Attorneys for Pacific Law Center

17 The following party is not on the list to receive e-mail notices from the Court. We are
18 emailing copies to Mr. Saadat-Nejad at c9729972@yahoo.com.

19 In addition, we are sending hard copies via Federal Express:

20 Shahrokh Saadat-Nejad
21 3713 Mt. Ashmun Place
22 San Diego, CA 92111
23 VIA FEDERAL EXPRESS

24 */s/ Edward J. McIntyre*
25 _____
26 EDWARD J. MCINTYRE