

1 William Silverstein

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4 *Counter-Defendant in pro per*

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6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 WILLIAM SILVERSTEIN, an individual,
9 Plaintiff,
10 vs.
11 E360INSIGHT, LLC, et al.
12 Defendants.

Case No.: CV07-02835-CAS (VBKx)

DECLARATION OF
F. BARI NEJADPOUR IN SUPPORT OF
THE COUNTERCLAIM-DEFENDANT'S
SPECIAL MOTION TO STRIKE

12 I, F. Bari Nejadpour, declare:

- 13 1. I am over eighteen years of age and competent to testify. I have personal knowledge
14 of the facts stated herein.
15
16 2. Exhibit A is a true and accurate copy, with private account information redacted, of
17 an e-mail that I received on September 4, 2007 from Joseph Kish, regarding sample e-
18 mails my client sent to him.
19
20 3. My billing rate is \$350.00 per hour.
21
22 4. I spent approximately 13 hours opposing the Counterclaim-Plaintiff's motion to add
23 counterclaim. I spent approximately 1 additional hour on the counter-Claim.

24 I declare under penalty of perjury under the laws of the United States of America
25 that the foregoing is true and correct.

26 Executed February 19, 2008, at Los Angeles, California.

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28 _____
F. Bari Nejadpour

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EXHIBIT A

EXHIBIT A

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Mail Accounts
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~~XXXXXXXXXX~~

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Draft
Sent
Bulk (151) [Empty]
Trash [Empty]
My Folders [Show]

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Subject: FW: more samples
Date: Tue, 4 Sep 2007 14:38:30 -0500
From: "Joseph L. Kish" <jkish@synergylawgroup.com> [View Contact](#)
Details [Add Mobile Alert](#)
To: ~~XXXXXXXXXX~~
CC: "Daniel J. Peters" <dpeters@synergylawgroup.com>

Bari:

The attached emails contain no information regarding the recipient and are therefore useless to either support the claims asserted in the First Amended Complaint or our ability to investigate Mr. Silverstein's claims. The entire messages should be sent, all of them, not just a select few.

Also, for reasons that should be obvious, Mr. Silverstein should communicate through at all times.

Please let me know when we can expect all of the complete email messages that purport to give rise to the claims asserted in the First Amended Complaint.

Joseph L. Kish
Partner
Synergy Law Group, L.L.C.
730 W. Randolph Street, Suite 600
Chicago Illinois, 60661
Tel: 312.454.0015
Fax: 312.454.0261
E-mail: jkish@synergylawgroup.com
Website: www.synergylawgroup.com

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Circular 230 Notice: In accordance with Treasury Regulations which became applicable to all tax practitioners as of June 20, 2005, please note that any tax advice given herein (and in any attachments) is not intended or written to be used, and cannot be used by any taxpayer, for the purpose of (i) avoiding tax penalties or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

-----Original Message-----
From: Bill Silverstein
[mailto:s[REDACTED]@sorehands.com]
Sent: Monday, August 27, 2007 3:08 AM
To: Joseph L. Kish
Subject: more samples

As per Mr. Nejadpour's instructions, I have enclosed a few more samples within the attached zip file.

<http://www.mattelabuse.com>

Mattel tries to silence free speech on the web.
<http://www.mattelabuse.com>

cc: [REDACTED]

Attachments

Attachment scanning provided by: 

Files:

 toe360.zip (15k)	Scan and Save to Computer
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