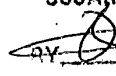


1 Case No.: 09 OC 00579 1B  
2 Dept. No.: 1

REC'D & FILED

2016 JAN -7 PM 4: 06

SUSAN MERRIWETHER  
CLERK

BY:  DEPUTY

5 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
6 IN AND FOR CARSON CITY

7 JED MARGOLIN, an individual,  
8 Plaintiff,

9 vs.

AMENDED ORDER GRANTING MOTION  
TO WITHDRAW AS COUNSEL

10 OPTIMA TECHNOLOGY CORPORATION, a  
11 California corporation, OPTIMA  
12 TECHNOLOGY CORPORATION, a Nevada  
13 corporation, REZA ZANDIAN  
14 aka GOLAMREZA ZANDIANJAZI  
15 aka GHOLAM REZA ZANDIAN  
16 aka REZA JAZI aka J. REZA JAZI  
17 aka G. REZA JAZI aka GHONONREZA  
18 ZANDIAN JAZI, an individual, DOE  
19 Corporations 1-10, DOE Corporations 11-20,  
20 and DOE Individuals 21-30,  
21 Defendants.

22 This matter comes before the Court on Kaempfer Crowell's Motion to Withdraw as Counsel,  
23 filed on December 10, 2015 (the "Motion"). An opposition was timely filed within the ten (10) day  
24 requirement of Rule 15(3) of the First Judicial District Court Rules ("FJDCR"), to include three days  
25 for mailing, on December 28, 2015.

26 This Court was unaware on December 31, 2015, when it issued its Order Granting Motion to  
27 Withdraw as Counsel that an opposition had been filed. As such, this amended order is being issued.

28 After considering the Motion, the Affidavit of Severin A. Carlson in support of the Motion,  
the papers and pleadings on file herein, Supreme Court Rule ("SCR") 46, FJDCR 22, and Nevada  
Rule of Professional Conduct ("NRPC") 1.16, and for good cause appearing, the Court hereby grants  
the Motion to Withdraw as Counsel.

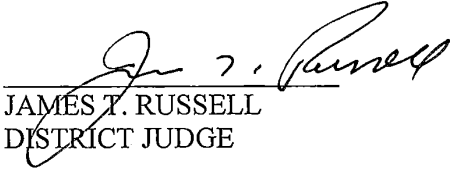
1 The Court finds that the reasons for withdrawal set forth by Severin A. Carlson, make the  
2 request to withdraw reasonable and justify granting the Motion, to wit: Defendant has substantially  
3 failed to fulfill his obligations to Kaempfer Crowell regarding its services, that Kaempfer Crowell's  
4 representation has also been rendered unreasonably difficult as a result of Defendant's failure to  
5 meet his obligations to counsel, and that Defendant insists upon taking action that the lawyer  
6 considers repugnant or with which the lawyer has fundamental disagreement.

7 However, as pointed out by the Plaintiff, this tactic has been used by the Defendant before in  
8 this case for delay purposes. As such, this order is conditioned on a valid address in California  
9 and/or Nevada being provided to the Plaintiff for service of any and all documents on Defendant,  
10 Reza Zandian. Additionally, the Defendant is ordered to comply with this Court's Order of  
11 November 6, 2015 as to appearing at a Judgment Debtor's Examination in San Diego, California in  
12 the month of February, 2016, at a specific location chosen by Plaintiff. Failure to do so will result in  
13 an order to show cause being issued by this Court.

14 NOW THEREFORE, **IT IS HEREBY ORDERED** as follows:

- 15 1. That the Motion to Withdraw as Counsel is hereby **GRANTED** upon the condition that a  
16 valid address is provided by Defendant in California and/or Nevada for the purpose of  
17 service of any and all documents; and
- 18 2. That Kaempfer Crowell, Severin A. Carlson, and Tara C. Zimmerman shall no longer be  
19 counsel of record for Defendant Reza Zandian upon the providing of the address for  
20 service in Nevada and/or California.
- 21 3. That the Defendant, Reza Zandian, is ordered to comply with this Court's Order of  
22 November 6, 2015 as to appearing at a Judgment Debtor's Examination at a specific  
23 location chosen by Plaintiff; and
- 24 4. Failure of Defendant, Reza Zandian, to comply with this Order will result in this Court  
25 issuing an Order to Show Cause as to why said defendant should not be held in contempt.

26 Dated this 7<sup>th</sup> day of January, 2016.

27  
28   
JAMES T. RUSSELL  
DISTRICT JUDGE

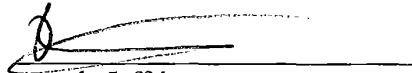
1 CERTIFICATE OF MAILING

2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the  
3 7<sup>th</sup> day of January, 2016, I served a copy of the foregoing Order by United States Mail, postage  
4 prepaid, addressed as follows:

5 Matthew D. Francis, Esq.  
6 Adam P. McMillen, Esq.  
7 5371 Kietzke Lane  
8 Reno, NV 89511

9 Severin A. Carlson, Esq.  
10 Tara C. Zimmerman, Esq.  
11 510 West Fourth Street  
12 Carson City, NV 89703

13 Reza Zandian  
14 c/o Alborz Zandian  
15 9 MacArthur Place, Unit 2105  
16 Santa Ana, California 92707-6753

17   
18 Angela Jeffries  
19 Judicial Assistant, Dept. 1  
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1 SEVERIN A. CARLSON  
Nevada Bar No. 9373  
2 KAEMPFER CROWELL  
510 West Fourth Street  
3 Carson City, Nevada 89703  
Telephone: (775) 882-1311  
4 Fax: (775) 882-0257  
scarlson@kcnvlaw.com

5 Attorneys for Defendant  
6 REZA ZANDIAN

7 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

8 IN AND FOR CARSON CITY

9 JED MARGOLIN, an individual,  
10 Plaintiff,  
vs.

Case No. 090C00579 1B  
Dept. No. 1

11 OPTIMA TECHNOLOGY CORPORATION,  
12 a California corporation; OPTIMA  
TECHNOLOGY CORPORATION, a Nevada  
13 corporation; REZA ZANDIAN aka  
GOLAMREZA ZANDIANJAZI aka  
14 GHOLAM REZA ZANDIAN aka REZA JAZI  
aka J. REZA JAZI aka G. REZA JAZI aka  
15 GHONONREZA ZANDIAN JAZI, an  
individual; DOE COMPANIES 1-10; DOE  
16 CORPORATIONS 11-20; and DOE  
INDIVIDUALS 21-30,  
17 Defendants.

18  
19 **AFFIDAVIT OF SEVERIN A. CARLSON IN RESPONSE TO AMENDED ORDER**  
20 **GRANTING MOTION TO WITHDRAW**

21 STATE OF NEVADA )  
22 ) ss.  
COUNTY OF WASHOE )

23 SEVERIN A. CARLSON, being first duly sworn, under penalty of perjury, deposes and  
24 states:

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

1           1.       I am an attorney licensed to practice law in the State of Nevada and am a partner  
2 with the law firm of Kaempfer Crowell, counsel for Defendant REZA ZANDIAN aka  
3 GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J.  
4 REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI (“Zandian”) in the  
5 above-entitled action.

6           2.       I have personal knowledge of all matters stated herein and could and would  
7 competently testify as to the matters set forth herein and make this affidavit under penalty of  
8 perjury.

9           3.       On January 7, 2016, the Court entered an Amended Order Granting Motion to  
10 Withdraw as Counsel (“Amended Order”).

11           4.       In the Amended Order, the Court placed a condition on the withdrawal of counsel,  
12 stating that withdrawal would not be complete until a service address for Zandian in Nevada  
13 and/or California had been provided.

14           5.       This Affidavit is made in response to the Amended Order with respect to the  
15 conditional withdrawal.

16           6.       On or about January 7, 2016, Zandian provided to this office a residency  
17 certificate setting forth his residential address in France, albeit in French. A true and correct copy  
18 of said certificate is attached hereto as **Exhibit 1**.

19           7.       Zandian’s son lives in California and his address has been provided by Zandian as  
20 an acceptable means of service on Zandian.

21           8.       Zandian’s son’s name is Alborz Zandian and his address is 9 MacArthur Place,  
22 Unit 2105, Santa Ana, California 92707-6753.

23           /././

24           /././

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9. This address has been the address where correspondence and invoices for my firm have been sent since March 5, 2014. None of the correspondence or invoices have been returned as undeliverable at any point in time.

10. I am unaware of any other address where Zandian may reside or conduct business in Nevada or California.

11. Zandian's last known email address is rezazand@hotmail.com.

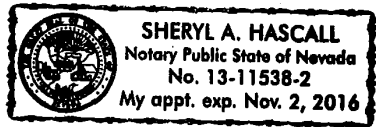
FURTHER AFFIANT SAYETH NAUGHT.

  
SEVERIN A. CARLSON

Subscribed and sworn to before me by Severin A. Carlson this 12<sup>th</sup> day of January, 2016.



NOTARY PUBLIC in and for said  
County and State  
My Commission Expires: 11/2/2016



KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 12<sup>th</sup> day of January, 2016, I caused the  
3 foregoing **AFFIDAVIT OF SEVERIN A. CARLSON IN RESPONSE TO AMENDED**  
4 **ORDER GRANTING MOTION TO WITHDRAW** to be served this date by depositing a true  
5 copy of the same for mailing at Reno, Nevada, first class postage fully prepaid and addressed to  
6 the following:

7 Matthew D. Francis, Esq.  
8 Adam P. McMillen, Esq.  
9 Watson Rounds  
10 5371 Kietzke Lane  
11 Reno, Nevada 89511  
12 775.324.4100  
13 775.333.8171 - facsimile  
14 **Attorneys for Plaintiff**

15 Reza Zandian  
16 c/o Alborz Zandian  
17 9 MacArthur Place, Unit 2105  
18 Santa Ana, California 92707-6753  
19 **Defendant**

20 Gholam Reza Zandian Jazi  
21 6 rue Edouard Fournier  
22 75116 Paris  
23 France  
24 **Defendant**

25 I also caused the foregoing **AFFIDAVIT OF SEVERIN A. CARLSON IN**  
26 **RESPONSE TO AMENDED ORDER GRANTING MOTION TO WITHDRAW** to be  
27 served this date by e-mail to Defendant as follows:

28 rezazand@hotmail.com

29   
30 an employee of Kaempfer Crowell

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

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EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGES
1	French residency certificate	4

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703



# EXHIBIT 1

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# EXHIBIT 1

RÉPUBLIQUE FRANÇAISE  
AUTORISATION PROVISOIRE DE SÉJOUR

PREFECTURE PRÉFECTURE DE POLICE  
DOSSIER N° 105700000 N° 8813081553  
ENTRÉE EN FRANCE 15/03/2012  
NOM (M.) XANDIAN JAYI  
PRÉNOMS GHOLAM REZA  
DATE DE NAISSANCE 15/01/1952 A TSPANAN  
NATIONALITÉ TRANTHME  
ADRESSE 06 RUE KDOUARD POIRNIER  
75116 PARIS



SIGNATURE ET CACHET  
DE L'AUTORITÉ

CETTÉ AUTORISATION A PROLONGER PROVISOIREMENT  
SON SÉJOUR EN FRANCE JUSQU'AU 23/03/2016  
CETTE AUTORISATION N'EST VALABLE QU'ACCOMPAGNÉ DU DOCUMENT  
N° 02524821 VALABLE DU 05/07/2013 AU 05/07/2016

Paris, le 23/03/2015  
Le Directeur

Cyrille MAILLET - M 1

FAIT À PARIS (CITE)  
LE 24/11/2015

VALABLE JUSQU'AU 23/03/2016  
02524821

CETTE AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

RÉPUBLIQUE FRANÇAISE  
AUTORISATION PROVISOIRE DE SÉJOUR

DIRECTION DÉPARTEMENTALE DE POLICE  
DOSSIER N° 1087000000  
ENTRÉE EN FRANCE DU 28/05/2012

N° 8813081553



NOM : KHOUAT, YAKI  
PRÉNOMS :  
NÉ LE 27/01/1952  
NÉ LE 27/01/1952  
NOM : KHOUAT, YAKI  
PRÉNOMS :  
NÉ LE 27/01/1952  
NÉ LE 27/01/1952

SIGNATURE ET CACHET  
DE L'AUTORITÉ

Le 28/05/2012 à 14h00

Cyrille MAILLET - M 1

FAIT À PARIS (75011)  
LE 20/05/2012

VALABLE JUSQU'AU 28/05/2012  
02524821

UN ABUS DE CE DOCUMENT PEUT CONSTITUER UN DÉLIT

RÉPUBLIQUE FRANÇAISE  
AUTORISATION PROVISOIRE DE SÉJOUR

DIRECTION DE POLICE  
ISTO00000

N° 9913081553

15/08/2012

KANDIAN JAYI

KOTAM BARU

INDONESIA

PROVINCE DE PARIS

ARRONDISSEMENT DE LA VILLE DE PARIS

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ARRONDISSEMENT DE LA VILLE DE PARIS

ARRONDISSEMENT DE LA VILLE DE PARIS



SIGNATURE ET CACHET  
DE L'AUTORITÉ

Pour le Préfet de Paris et par délégation  
Le Directeur

Cyrille MAILLET - M 1

PARIS (CITR)

24/11/2015

VALABLE JUSQU'AU 23/03/2016

02524824

PROCEDEZ A L'ACQUISITION D'UN EMPLOI