

1 Matthew D. Francis  
2 Nevada Bar No. 6978  
3 mfrancis@bhfs.com  
4 Arthur A. Zorio  
5 Nevada Bar No. 6547  
6 azorio@bhfs.com  
7 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
8 5371 Kietzke Lane  
9 Reno, NV 89511  
10 Telephone: 775.324.4100  
11 Facsimile: 775.333.8171  
12 *Attorneys for JED MARGOLIN*

13 **IN THE UNITED STATES BANKRUPTCY COURT**  
14 **FOR THE DISTRICT OF NEVADA**

15 In Re JAZI GHOLAMREZA ZANDIAN,  
16  
17 Debtor.

Case No. BK-N-16-50644-BTB

**Adversary No. 17-05016-BTB**

18 \_\_\_\_\_ /  
19 FRED SADRI, AS TRUSTEE FOR THE  
20 STAR LIVING TRUST, DATED APRIL  
21 14, 1997; RAY KOROGHLI AND  
22 SATHSOWI T. KOROGHLI, AS  
23 MANAGING TRUSTEES FOR  
24 KOROGHLI MANAGEMENT TRUST,

25 Plaintiffs,

26 v.

27 JED MARGOLIN; JAZI GHOLAMREZA  
28 ZANDIAN; and all other parties claiming  
an interest in real properties described in  
this action,

Defendants.

\_\_\_\_\_ /  
PATRICK CANET,

Counterclaimant,

v.

FRED SADRI, INDIVIDUALLY AND AS  
TRUSTEE FOR THE STAR LIVING  
TRUST; RAY KOROGHLI,  
INDIVIDUALLY; RAY KOROGHLI  
AND SATHSOWI T. KOROGHLI, AS  
MANAGING TRUSTEES FOR

1 KOROGHLI MANAGEMENT TRUST,  
2 Counter-Defendants.  
3 \_\_\_\_\_ /  
4 PATRICK CANET,  
5 Cross-Claimant,  
6 v.  
7 JED MARGOLIN,  
8 Cross-Defendant.

9  
10 **DEFENDANT JED MARGOLIN'S FIRST SET**  
11 **OF INTERROGATORIES TO PATRICK CANET**

12 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Jed Margolin  
13 ("MARGOLIN") hereby requests that Counterclaimant/Cross-Claimant Patrick Canet  
14 ("CANET") serve responses to the following Interrogatories within thirty (30) days of service  
15 hereof. These Interrogatories are considered continuing and therefore CANET is required to  
16 supplement his answers whenever he obtains different or additional knowledge, information or  
17 belief relative to the Interrogatories.

18 **I. DEFINITIONS**

19 The following definitions and instructions apply to each of the Interrogatories hereinafter  
20 set forth:

21 A. When used herein, the name "ZANDIAN" refers to "JAZI GHOLAMREZA  
22 ZANDIAN" and any and all of the other names and aliases he has used, including but not limited  
23 to: REZA ZANDIAN aka GOLAMREZA ZANDIAN JAZI aka GHOLAM REZA ZANDIAN  
24 aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONOREZA ZANDIAN JAZI.

25 B. When used herein, the name "SADRI" includes the names "FRED SADRI,"  
26 "FARIBORZ SADRI, and "FRED SADRI, AS TRUSTEE FOR THE STAR LIVING TRUST,"  
27 and any other name(s) he uses or entities that he controls.

28 C. When used herein, the name "RAY KOROGHLI" includes the names "RAY

1 KOROGHLI” and “RAY KOROGHLI AS MANAGING TRUSTEE FOR KOROGHLI  
2 MANAGEMENT TRUST” and any other entities that he controls.

3 D. When used herein, the name “SATHSOWI T. KOROGHLI” includes  
4 “SATHSOWI T. KOROGHLI” and “SATHSOWI T. KOROGHLI AS MANAGING TRUSTEE  
5 FOR KOROGHLI MANAGEMENT TRUST.”

6 E. When used herein, the name “KMT” refers to “KOROGHLI MANAGEMENT  
7 TRUST.”

8 F. When used herein, the word “COMPLAINT” refers to the COMPLAINT FOR  
9 QUIET TITLE AND DECLARATORY RELIEF filed in this Case 17-05016-btb on May 25,  
10 2017.

11 G. When used herein, the name “CANET” refers to Counterclaimant and Cross-  
12 Claimant “PATRICK CANET.”

13 H. The term “FRENCH ACTION” refers to the French Bankruptcy proceeding dated  
14 April 3, 1998 that is the basis for the CANET Chapter 15 Petition.

15 I. When used herein, the term “You” and/or “Your” their plural or any synonym  
16 thereof, is intended to and shall refer to CANET and any member of his law firm.

17 J. When used herein, the terms “Communicate,” “Communicated,”  
18 “Communications” or “Communications” refer to all conversations, messages, Writings,  
19 correspondence, or contacts between any Persons (with the exception of Your attorneys), whether  
20 in person, in Writing, electronically, by telephone, or by any other means.

21 K. When used herein, the term “Person” its plural or any synonym thereof, is intended  
22 to and shall embrace and include any individual, partnership, corporation, trust, estate, company,  
23 association, government agency (federal, state, local or foreign), or any other entity.

24 L. When used herein, the terms “Relate,” “Related To” or “Relating To” mean  
25 constituting, comprising, consisting, containing, setting forth, showing, disclosing, describing,  
26 explaining, mentioning, evidencing, reflecting, embodying, summarizing, concerning, or referring  
27 to, directly or indirectly.

28 M. When used herein, the terms “Document” and “Writing,” and the plural forms

1 thereof, shall mean all written, typewritten, printed, recorded, or graphic matters, however  
2 produced or reproduced, of every kind and description, including Electronically-Stored  
3 Information pertaining in any way to the subject matter of this action and within the meaning of  
4 Rule 34 of the Federal Rules of Civil Procedure. The terms “Document” and “Writing” shall  
5 include, but are not limited to, any emails, books, pamphlets, periodicals, memoranda, letters,  
6 correspondence, telegrams, applications, leases, memoranda of understanding, agreements,  
7 contracts, permits, articles, bylaws, financial records, security instruments, checks, bank  
8 statements, receipts, invoices, bids, proposals, offers, counteroffers, time records, accounting  
9 records, minutes, records of meetings, reports, notes, diaries, logs, tapes, transcripts, recordings,  
10 records of phone calls, work papers, charts, drawings, photographs, or any other written, recorded  
11 or graphic matter, however produced or reproduced, including all non-identical copies containing  
12 notations not contained on the original thereof, and including all disks, diskettes, flash drives,  
13 thumb drives, portable drives, compact disks, tapes or other recordings used in data and/or word  
14 processing, together with the programming instructions and other materials necessary to  
15 understand such media, capable of being retrieved from a computer, in Your possession, custody  
16 or control. Documents shall also include original or non-identical copies of such items, in both  
17 final and draft form, of every kind and nature whatsoever, that are within Your possession,  
18 custody or control, or that are known by You to exist. Writing shall also include handwriting,  
19 typewriting, printing, photo stating, photographing, photocopying, transmitting by electronic mail  
20 or facsimile, and every other means of recording upon any tangible thing, any form of  
21 communication or representation, including letters, words, pictures, sounds, or symbols, or  
22 combinations thereof, and any record thereby created, regardless of the manner in which the  
23 record has been stored.

24 N. As used in these Requests, the term “Electronically-Stored Information” refers to  
25 all information created, manipulated, communicated, stored, and best utilized in digital form,  
26 requiring the use of computer hardware and software.

## 27 **II. GUIDELINES**

28 A. Whenever the phrase “State in Detail” or “Describe in Detail” is used in these

1 Interrogatories, You are required to set forth every fact, consideration, factor, circumstance, act,  
2 omission, event, transaction, occurrence, or statement which supports, refutes, concerns, relates  
3 to, or refers to the matter about which information is sought.

4 B. Whenever the term “Identify” or “Identification” is used in these Interrogatories  
5 with respect to an individual person, You are required to state: the full name of each such person;  
6 his or her last known residential address; his or her last known business address; and his or her  
7 present or last known job title, job description, and the dates during which the job position was  
8 held. Once a person has been identified in an answer to an interrogatory, it shall be sufficient  
9 thereafter when identifying that person merely to state his or her name.

10 C. Whenever the term “Identify” or “Identification” is used in these Interrogatories  
11 with respect to any corporation, limited liability company, partnership, or business entity, You are  
12 required to state: its present or last known full name; all of its previous registered and/or  
13 operating business names, if any; its present or last known business address; and the nature of its  
14 business. Once a corporation, limited liability, partnership, or business entity has been identified  
15 in an answer to an interrogatory, it shall be sufficient thereafter when identifying such entity  
16 merely to state its name.

17 D. Whenever the terms “Identify,” “Identity” or “Identification” are used in these  
18 Interrogatories with respect to a Document or Documents, You are required to:

- 19 (1) Describe the type of Document, e.g., letter, memorandum, report, diary,  
20 chart, etc.;
- 21 (2) Provide the date, if any, of the Document;
- 22 (3) Identify the author(s) of the Document;
- 23 (4) Identify each addressee appearing on the Document;
- 24 (5) Identify each recipient of the Document or any copies of the Document;
- 25 (6) Describe the contents of the Document;
- 26 (7) Describe the present location of the Document; and
- 27 (8) Identify the Person(s) having possession, control, or custody of the  
28 Document. If any such Document was, but is no longer in Your possession, custody or control,

1 state what disposition was made of it; and if such Document was destroyed, or alleged to have  
2 been destroyed, state the date of and reason for its destruction, the Identity of each person having  
3 knowledge of its destruction, and each person responsible for its destruction. For each  
4 interrogatory that requests the identification of Document(s), You may produce for inspection and  
5 copying, true and correct copies of the Document(s) as kept in the usual course of business,  
6 organized and labeled to correspond with the categories in this request, all in accordance with  
7 Rule 33(c) of the Federal Rules of Civil Procedure, and such production of copies will be  
8 accepted as complying with such request.

9 E. Whenever the terms “Identify,” “Identity,” or “Identification” is used in these  
10 Interrogatories with respect to an oral communication, You are required to:

- 11 (1) State the date and place of such communication;
- 12 (2) Identify the Person(s) who initiated said communication;
- 13 (3) Identify each Person who participated in or was present at any part of or all  
14 of said communication, or who became privy to the substance of said communication;
- 15 (4) Describe in Detail the purpose, content and substance of said  
16 communication; and
- 17 (5) State whether said communication occurred in person or by telephone, or if  
18 both, the method by which each individual participated.

19 F. Should You deem any information requested by any of the following  
20 Interrogatories to be privileged, You shall specify that a claim of privilege is being made, briefly  
21 state the grounds on which the claim of privilege rests, and Identify who is making the claim of  
22 privilege.

23 G. All Documents and Writings are to be produced which are in Your possession,  
24 custody or control, or can be ascertained upon reasonable investigation within Your control. The  
25 knowledge of Your attorneys is deemed to be Your knowledge, so that, apart from privileged  
26 matters, if Your attorneys have knowledge of Documents or Writings sought to be elicited herein,  
27 said Documents and Writings must be incorporated into Your answers, even if such information  
28 is unknown to You.

1 H. If You do not know or have the information requested in any or all of the  
2 following discovery, please be prepared to identify the Person who, to the best of Your  
3 knowledge, would know or have the answer or information requested.

4 **III. INTERROGATORIES**

5 **INTERROGATORY NO. 1:**

6 Identify and Describe in Detail all Documents, Writings, and Communications between  
7 You and ZANDIAN Relating To this adversary proceeding, the subject matter of this adversary  
8 proceeding, and/or the FRENCH ACTION.

9 **INTERROGATORY NO. 2:**

10 Identify and Describe in Detail all Documents, Writings, and Communications between  
11 You and SADRI Relating To this adversary proceeding, the subject matter of this adversary  
12 proceeding, and/or the FRENCH ACTION.

13 **INTERROGATORY NO. 3:**

14 Identify and Describe in Detail all Documents, Writings, and Communications between  
15 You and RAY KOROGHLI Relating To this adversary proceeding, the subject matter of this  
16 adversary proceeding, and/or the FRENCH ACTION.

17 **INTERROGATORY NO. 4:**

18 Identify and Describe in Detail all Documents, Writings, and Communications between  
19 You and SATHSOWI T. KOROGHLI Relating To this adversary proceeding, the subject matter  
20 of this adversary proceeding, and/or the FRENCH ACTION.

21 **INTERROGATORY NO. 5:**

22 Identify and Describe in Detail all Documents, Writings, and Communications between  
23 You and KMT Relating To this adversary proceeding, the subject matter of this adversary  
24 proceeding, and/or the FRENCH ACTION.

25 **INTERROGATORY NO. 6:**

26 Identify and Describe in Detail any and all contracts or agreements You have with any  
27 Person(s) Relating To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim,  
28 and/or Your Cross-Claim.

1 **INTERROGATORY NO. 7:**

2 Identify and Describe in Detail any and all contracts or agreements You have with  
3 ZANDIAN Relating To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim,  
4 and/or Your Cross-Claim.

5 **INTERROGATORY NO. 8:**

6 Identify and Describe in Detail any and all contracts or agreements You have with SADRI  
7 Relating To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your  
8 Cross-Claim.

9 **INTERROGATORY NO. 9:**

10 Identify and Describe in Detail any and all contracts or agreements You have with RAY  
11 KOROGHLI Relating To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim,  
12 and/or Your Cross-Claim.

13 **INTERROGATORY NO. 10:**

14 Identify and Describe in Detail any and all contracts or agreements You have with  
15 SATHSOWI T. KOROGHLI Relating To the FRENCH ACTION, Your Chapter 15 Petition,  
16 Your Counterclaim, and/or Your Cross-Claim.

17 **INTERROGATORY NO. 11:**

18 Identify and Describe in Detail any and all contracts or agreements You have with KMT  
19 Relating To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your  
20 Cross-Claim.

21 **INTERROGATORY NO. 12:**

22 Identify and Describe in Detail all actions You have taken anywhere in the world to  
23 collect the judgment against ZANDIAN that resulted from the FRENCH ACTION.

24 **INTERROGATORY NO. 13:**

25 Identify and Describe in Detail all Documents, Writings, and Communications that You  
26 received from, or sent to, Bank Melli in the FRENCH ACTION.

27 **INTERROGATORY NO. 14:**

28 Identify and Describe in Detail why You waited approximately 18 years after You



1 obtained Your Judgment against ZANDIAN in the FRENCH ACTION to attempt to satisfy Your  
2 Judgment against ZANDIAN in Nevada.

3 **INTERROGATORY NO. 15:**

4 Identify and Describe in Detail any and all agreements and contracts You have with  
5 ZANDIAN relating to the recovery or acquisition of any real property that is the subject of this  
6 adversary proceeding.

7 **INTERROGATORY NO. 16:**

8 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
9 Communications that support Your FIRST CROSS CLAIM.

10 **INTERROGATORY NO. 17:**

11 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
12 Communications that support paragraph 67 of Your FIRST CROSS CLAIM.

13 **INTERROGATORY NO. 18:**

14 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
15 Communications that support paragraph 68 of Your FIRST CROSS CLAIM.

16 **INTERROGATORY NO. 19:**

17 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
18 Communications that support paragraph 69 of Your FIRST CROSS CLAIM.

19 **INTERROGATORY NO. 20:**

20 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
21 Communications that support Your SECOND CROSS CLAIM.

22 **INTERROGATORY NO. 21:**

23 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and

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Communications that support paragraph 71 of Your FIRST CROSS CLAIM.

DATED: This 19<sup>th</sup> day of January, 2018.

BROWNSTEIN HYATT FARBER SCHRECK, LLP



Matthew D. Francis  
Arthur A. Zorio  
5371 Kietzke Lane  
Reno, NV 89511  
Telephone: 775-324-4100  
*Attorneys for JED MARGOLIN*

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
5371 Kietzke Lane  
Reno, NV 89511  
775.324.4100

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 19<sup>th</sup> day of January, 2018, I served the document entitled **DEFENDANT JED MARGOLIN'S FIRST SET OF INTERROGATORIES TO PATRICK CANET** on the parties listed below via the following:

**VIA FIRST CLASS U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada, addressed as follows:

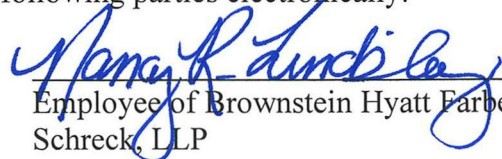
Dana Jonathon Nitz, Esq.  
Yanxiong Li, Esq.  
Wright, Finlay & Zak, LLP  
7785 W. Sahara Avenue., Suite 200  
Las Vegas, NV 89117  
yli@wrightlegal.net

Jeffrey L. Harman, Esq.  
HARMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
notices@bankruptcyreno.com

**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

**VIA COURIER:** by delivering a copy of the document to a courier service for over-night delivery to the foregoing parties.

**VIA ELECTRONIC SERVICE:** by electronically filing the document with the Clerk of the Court using the ECF system which served the following parties electronically:

  
Employee of Brownstein Hyatt Farber  
Schreck, LLP