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7
8 **IN THE UNITED STATES BANKRUPTCY COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 In Re JAZI GHOLAMREZA ZANDIAN,
11 Debtor.

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

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

13 FRED SADRI, AS TRUSTEE FOR THE
14 STAR LIVING TRUST, DATED APRIL
15 14, 1997; RAY KOROGHLI AND
16 SATHSOWI T. KOROGHLI, AS
MANAGING TRUSTEES FOR
KOROGHLI MANAGEMENT TRUST,

17 Plaintiffs,

18 v.

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

21 Defendants.

22 PATRICK CANET,
23

24 Counterclaimant,

25 v.

26 FRED SADRI, INDIVIDUALLY AND AS
27 TRUSTEE FOR THE STAR LIVING
TRUST; RAY KOROGHLI,
INDIVIDUALLY; RAY KOROGHLI
AND SATHSOWI T. KOROGHLI, AS
28 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 REQUESTS FOR PRODUCTION TO PLAINTIFFS**

12 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Jed Margolin
13 ("MARGOLIN") hereby requests that Plaintiffs FRED SADRI, AS TRUSTEE FOR THE STAR
14 LIVING TRUST, DATED APRIL 14, 1997; RAY KOROGHLI AND SATHSOWI T.
15 KOROGHLI, AS MANAGING TRUSTEES FOR KOROGHLI MANAGEMENT TRUST
16 (collectively "PLAINTIFFS") produce responses and Documents and things pursuant to these
17 Requests within thirty (30) days of service hereof. These Requests are considered continuing and
18 therefore PLAINTIFFS are required to supplement their answers and provide supplemental
19 Documents and things whenever they obtain different or additional knowledge, information
20 and/or Documents and things relative to these Requests.

21 **I. DEFINITIONS AND GUIDELINES**

22 MARGOLIN incorporates by reference the Definitions and Guidelines contained in his
23 First Set of Interrogatories to Plaintiffs.

24 **II. REQUESTS FOR PRODUCTION**

25 **REQUEST NO. 1:**

26 Produce all Documents and things Relating To any non-privileged Documents, Writings,
27 and Communications between the PLAINTIFFS, or any of them, Relating To MARGOLIN, any
28 court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any

1 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

2 **REQUEST NO. 2:**

3 Produce all Documents and things Relating To any non-privileged Documents, Writings,
4 and Communications between SADRI and RAY KOROGHLI Relating To MARGOLIN, any
5 court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
6 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

7 **REQUEST NO. 3:**

8 Produce all Documents and things Relating To any non-privileged Documents, Writings,
9 and Communications between SADRI and SATHSOWI T. KOROGHLI Relating To
10 MARGOLIN, any court judgment MARGOLIN has against ZANDIAN, any patent owned by
11 MARGOLIN, and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to
12 present.

13 **REQUEST NO. 4:**

14 Produce all Documents and things Relating To any non-privileged Documents, Writings,
15 and Communications between SADRI and KMT Relating To MARGOLIN, any court judgment
16 MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any lawsuit
17 between MARGOLIN and ZANDIAN, from December 2007 to present.

18 **REQUEST NO. 5:**

19 Produce all Documents and things Relating To any non-privileged Documents, Writings,
20 and Communications between RAY KOROGHLI and SATHSOWI T. KOROGHLI Relating To
21 MARGOLIN, any court judgment MARGOLIN has against ZANDIAN, any patent owned by
22 MARGOLIN, and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to
23 present.

24 **REQUEST NO. 6:**

25 Produce all Documents and things Relating To any non-privileged Documents, Writings,
26 and Communications between RAY KOROGHLI and KMT Relating To MARGOLIN, any court
27 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
28 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

1 **REQUEST NO. 7:**

2 Produce all Documents and things Relating To any non-privileged Documents, Writings,
3 and Communications between SATHSOWI T. KOROGHLI and KMT Relating To MARGOLIN,
4 any court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and
5 any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

6 **REQUEST NO. 8:**

7 Produce all Documents and things Relating To any non-privileged Documents, Writings,
8 and Communications between any of the PLAINTIFFS Relating To any purchase or potential
9 purchase of any court judgment MARGOLIN has against ZANDIAN

10 **REQUEST NO. 9:**

11 Produce all Documents and things Relating To any non-privileged Documents, Writings,
12 and Communications that Relate to ZANDIAN receiving any payment of any money or other
13 consideration from "Pico Holdings."

14 **REQUEST NO. 10:**

15 Produce all Documents and things Relating To any non-privileged Documents, Writings,
16 and Communications that Relate to any payment of any money or other consideration from any
17 PLAINTIFF to ZANDIAN.

18 **REQUEST NO. 11:**

19 Produce all Documents and things Relating To any non-privileged Documents, Writings,
20 and Communications that support Your FIRST CAUSE OF ACTION contained in Your
21 COMPLAINT.

22 **REQUEST NO. 12:**

23 Produce all Documents and things Relating To any non-privileged Documents, Writings,
24 and Communications that support Your SECOND CAUSE OF ACTION contained in Your
25 COMPLAINT.

26 **REQUEST NO. 13:**

27 Produce all Documents and things Relating To any non-privileged Documents, Writings,
28 and Communications that support Your THIRD CAUSE OF ACTION contained in Your

1 COMPLAINT.

2 **REQUEST NO. 14:**

3 Produce all Documents and things Relating To any non-privileged Documents, Writings,
4 and Communications that support the PRAYER for relief contained in Your COMPLAINT.

5 **REQUEST NO. 15:**

6 Produce all Documents and things Relating To any non-privileged Documents, Writings,
7 and Communications that support paragraph 23 of Your COMPLAINT that “Margolin did not
8 properly record a copy of the Default Judgment at the Washoe County Recorder’s Office in
9 accordance with NRS 17.150 prior to executing upon Debtor’s interest in the Property”.

10 **REQUEST NO. 16:**

11 Produce all Documents and things Relating To any non-privileged Documents, Writings,
12 and Communications that support paragraph 24 of Your COMPLAINT that “Margolin did not
13 cause a copy of the Notice of Sale to be served in accordance with NRS 21.130 prior to executing
14 upon Debtor’s interest in the Property.”

15 **REQUEST NO. 17:**

16 Produce all Documents and things Relating To any non-privileged Documents, Writings,
17 and Communications that support paragraph 34 of Your COMPLAINT that “Margolin did not
18 comply with all mailing and noticing requirements stated in NRS 17.150 and 21.130”.

19 **REQUEST NO. 18:**

20 Produce all Documents and things Relating To any non-privileged Documents, Writings,
21 and Communications that support paragraph 38 of Your COMPLAINT that ‘The Sheriff’s Sales
22 violated Plaintiffs’ rights to due process because they were not given proper, adequate notice and
23 the opportunity to protect their interest in title to the Property.’”

24 **REQUEST NO. 19:**

25 Produce all Documents and things Relating To any non-privileged Documents, Writings,
26 and Communications that support paragraph 39 of Your COMPLAINT that “The Sheriff’s Sales
27 were an invalid sale and could not have extinguished Plaintiffs’ interest because of defects in the
28 notices given to Plaintiffs, or their predecessors, agents, servicers or trustees, if any.”

1 **REQUEST NO. 20:**

2 Produce all Documents and things Relating To any non-privileged Documents, Writings,
3 and Communications that support paragraph 40 of Your COMPLAINT that “Alternatively, the
4 Sheriff’s Sales themselves were valid but Margolin took his interest subject to Plaintiffs’ interest.

5 **REQUEST NO. 21:**

6 Produce all Documents and things Relating To any non-privileged Documents, Writings,
7 and Communications that support paragraph 43 of Your COMPLAINT that “The Sheriff’s Sales
8 were not commercially reasonable and were not done in good faith, in light of the sale price and
9 the market value of the Property, and the errors alleged above.”

10 **REQUEST NO. 22:**

11 Produce all Documents and things Relating To any non-privileged Documents, Writings,
12 and Communications that support paragraph 44 of Your COMPLAINT that “The circumstances
13 of the Sheriff’s Sales breached the Margolin’s obligations of good faith and his duty to act in a
14 commercially reasonable manner.”

15 **REQUEST NO. 23:**

16 Produce all Documents and things Relating To any non-privileged Documents, Writings,
17 and Communications that support paragraph 45 of Your COMPLAINT that “The Sheriff’s Sales
18 by which Margolin took his interest were commercially unreasonable if they extinguished
19 Plaintiffs’ title interest in the Property.”

20 **REQUEST NO. 24:**

21 Produce all Documents and things Relating To any non-privileged Documents, Writings,
22 and Communications that support paragraph 46 of Your COMPLAINT that “The circumstances
23 of the Sheriff’s Sales of the Property prevent Margolin from being deemed a bona fide purchaser
24 for value.”

25 **REQUEST NO. 25:**

26 Produce all Documents and things Relating To any non-privileged Documents, Writings,
27 and Communications that support paragraph 47 of Your COMPLAINT that “Margolin has actual,
28 constructive or inquiry notice of Plaintiffs’ interest in the Property, which prevents Margolin from

1 being deemed a bona fide purchaser for value.”

2 **REQUEST NO. 26:**

3 Produce all Documents and things Relating To any Documents, Writings, and
4 Communications between the PLAINTIFFS, or any of them, and CANET, Relating To any real
5 property that is the subject of this adversary proceeding.

6 **REQUEST NO. 27:**

7 Produce all Documents and things Relating To any Documents, Writings, and
8 Communications between the PLAINTIFFS, or any of them, and CANET, Relating To any
9 change in ownership of any real property that is the subject of this adversary proceeding.

10 **REQUEST NO. 28:**

11 Produce all Documents and things Relating To any written or oral agreements between the
12 PLAINTIFFS, or any of them, and CANET, Relating To any real property that is the subject of
13 this adversary proceeding.

14 **REQUEST NO. 29:**

15 Produce all Documents and things Relating To any Documents, Writings, and
16 Communications between the PLAINTIFFS, or any of them, and CANET, Relating To
17 MARGOLIN.

18 **REQUEST NO. 30:**

19 Produce all Documents and things Relating To any Documents, Writings, and
20 Communications between the PLAINTIFFS, or any of them, and CANET, Relating To this
21 adversary proceeding.

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REQUEST NO. 31:

Produce all Documents and things Relating To any and all responses contained in Your responses to Defendant Jed Margolin's First Set of Interrogatories to Plaintiffs.

DATED: This 19th day of January, 2018.

BROWNSTEIN HYATT FARBER SCHRECK, LLP



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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 19th day of January, 2018, I served the document entitled DEFENDANT JED MARGOLIN'S FIRST SET OF REQUESTS FOR PRODUCTION TO PLAINTIFFS 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:

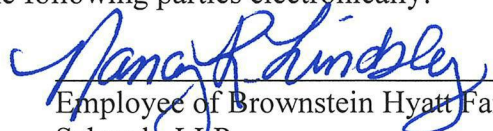
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BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual 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:


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