

1 WRIGHT, FINLAY & ZAK, LLP  
2 Dana Jonathon Nitz, Esq.  
3 Nevada Bar No. 0050  
4 Edgar C. Smith, Esq.  
5 Nevada Bar No. 5506  
6 Yanxiong Li, Esq.  
7 Nevada Bar No. 12807  
8 7785 W. Sahara Ave., Suite 200  
9 Las Vegas, Nevada 89117  
10 (702) 475-7964; Fax: (702) 946-1345  
11 [yli@wrightlegal.net](mailto:yli@wrightlegal.net)

12 *Attorneys for Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity and as*  
13 *Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli and Sathsowi T. Koroghli,*  
14 *in their individual capacities as well as Managing Trustees for Koroghli Management Trust*

15 **UNITED STATES BANKRUPTCY COURT**  
16 **DISTRICT OF NEVADA**

17 In re: JAZI GHOLAMREZA ZANDIAN,  
18  
19 Debtor.

**Case No.: N-16-50644-btb**

**CHAPTER 15**

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

**Adv. No. 17-05016-btb**

**PLAINTIFFS' RESPONSES TO  
DEFENDANT JED MARGOLIN'S  
FIRST SET OF INTERROGATORIES**

25 Plaintiffs,

26 vs.

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,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS

1 CAPACITY AS TRUSTEE OF THE STAR  
2 LIVING TRUST AND RAY KOROGHLI  
3 INDIVIDUALLY, AND RAY KOROGHLI  
4 AND SATHSOWI T. KOROGHLI AS  
5 MANAGING TRUSTEES OF THE  
6 KOROGHLI MANAGEMENT TRUST,

7 Counter-Defendants.

8 PATRICK CANET,

9 Cross-Claimant,

10 v.

11 JED MARGOLIN,

12 Cross-Defendant.

13 COME NOW, Plaintiffs/Counter-Defendants, Fred Sadri, as Trustee for The Star Living  
14 Trust, dated April 14, 1997 (“SLT”) and Ray Koroghli and Sathsowi T. Koroghli, as Managing  
15 Trustees for Koroghli Management Trust (“KMT”) (collectively with SLT, hereinafter as  
16 “Plaintiffs”), by and through their counsel, Dana Jonathon Nitz, Esq., and Yanxiong Li, Esq., of  
17 the law firm of Wright, Finlay & Zak, LLP, and hereby submit their responses to Defendant Jed  
18 Margolin’s (“Margolin”) First Set of Interrogatories.

19 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

20 Plaintiffs’ responses herein to Margolin’s First Set of Interrogatories (the “Responses”)  
21 are subject to the following general objections (the “General Objections”). The General  
22 Objections may be specifically referred to in the Responses for the purpose of clarity. The  
23 failure to specifically incorporate a General Objection, however, should not be construed as a  
24 waiver of the General Objections.

25 1. Nothing herein shall be construed as an admission or waiver by Plaintiffs of: (a)  
26 their rights respecting admissibility, competency, relevance, privilege, materiality, and  
27 authenticity of any information provided in the Responses, any documents identified therein, or  
28 the subject matter thereof; (b) their objection due to vagueness, ambiguity, or undue burden; and  
(c) their rights to object to the use of any information provided in the Responses, any document

1 identified therein, or the subject matter contained in the Responses during a subsequent  
2 proceeding, including the trial of this or any other action.

3 2. The Responses are made solely for the purposes of, and in relation to, this  
4 litigation.

5 3. Plaintiffs object to the Interrogatories to the extent they seek documents and  
6 information protected by the attorney-client privilege and/or seeks the work product of counsel.

7 4. Plaintiffs have not completed: (a) their investigation of facts, witnesses, or  
8 documents relating to this case, (b) discovery in this action, (c) their analysis of available data,  
9 and (d) their preparations for trial. Thus, although a good faith effort has been made to supply  
10 pertinent information where the same has been requested, it is not possible in some instances for  
11 unqualified Responses to be made to the Discovery Requests. Further, the Responses are  
12 necessarily made without prejudice to Plaintiffs' right to produce evidence of subsequently  
13 discovered fact, witnesses, or documents, as well as any new theories or contentions that  
14 Plaintiffs may adopt. The Responses are further given without prejudice to Plaintiffs' right to  
15 provide information concerning facts, witnesses, or documents omitted by the Responses as a  
16 result of oversight, inadvertence, good faith error, or mistake. Plaintiffs have responded to the  
17 Interrogatories based on information that is presently available to them and to the best of their  
18 knowledge to date. The Responses may include hearsay and other forms of evidence that may  
19 be neither reliable nor admissible.

20 Without waiving their General Objections, Plaintiffs respond to the Interrogatories as  
21 follows:

## 22 **INTERROGATORIES**

### 23 **INTERROGATORY NO. 1:**

24 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
25 Communications between the PLAINTIFFS, or any of them, Relating To MARGOLIN, any  
26 court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and  
27 any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

28 ///

1 **RESPONSE TO INTERROGATORY NO. 1:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
3 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and  
4 seeks information that is neither relevant nor proportional to the needs of this case. This  
5 Interrogatory is also unduly burdensome as it seeks information outside of possession and  
6 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary  
7 Proceeding. Without waiving any objections, Plaintiffs respond: see documents served with their  
8 Initial Disclosures and supplements thereto as WFZ 2599-2603. Plaintiffs may have had other  
9 communications responsive to this Interrogatory, but cannot recall the details of those  
10 communications.

11 **INTERROGATORY NO. 2:**

12 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
13 Communications between SADRI and RAY KOROGHLI Relating To MARGOLIN, any court  
14 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any  
15 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

16 **RESPONSE TO INTERROGATORY NO. 2:**

17 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
18 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and  
19 seeks information that is neither relevant nor proportional to the needs of this case. This  
20 Interrogatory is also unduly burdensome as it seeks information outside of possession and  
21 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary  
22 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and  
23 private information regarding individuals who are not named Respondents. Without waiving any  
24 objections, Plaintiffs respond: see documents served with their Initial Disclosures and  
25 supplements thereto as WFZ 2599-2603. Plaintiffs may have had other communications  
26 responsive to this Interrogatory, but cannot recall the details of those communications.

27 ///

28 ///

1 **INTERROGATORY NO. 3:**

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

6 **RESPONSE TO INTERROGATORY NO. 3:**

7 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
8 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and  
9 seeks information that is neither relevant nor proportional to the needs of this case. This  
10 Interrogatory is also unduly burdensome as it seeks information outside of possession and  
11 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary  
12 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and  
13 private information regarding individuals who is not a named Respondents or who is not a party  
14 to this action, the disclosure of which would violate those individuals' or entities'  
15 constitutionally protected right to privacy. Without waiving any objections, Plaintiffs respond:  
16 on information and belief formed after a diligent review of Plaintiffs' records, Plaintiffs are not  
17 aware of any documents or communications responsive to this Interrogatory.

18 **INTERROGATORY NO. 4:**

19 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
20 Communications between SADRI and KMT Relating To MARGOLIN, any court judgment  
21 MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any lawsuit  
22 between MARGOLIN and ZANDIAN, from December 2007 to present.

23 **RESPONSE TO INTERROGATORY NO. 4:**

24 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
25 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and  
26 seeks information that is neither relevant nor proportional to the needs of this case. This  
27 Interrogatory is also unduly burdensome as it seeks information outside of possession and  
28 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary

1 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and  
2 private information regarding individuals who is not a named Respondent. Without waiving any  
3 objections, Plaintiffs respond: see documents served with their Initial Disclosures and  
4 supplements thereto as WFZ 2599-2603. Plaintiffs may have had other communications  
5 responsive to this Interrogatory, but cannot recall the details of those communications.

6 **INTERROGATORY NO. 5:**

7 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
8 Communications between RAY KOROGHLI and SATHSOWI T. KOROGHLI Relating To  
9 MARGOLIN, and court judgment MARGOLIN has against ZANDIAN, any patent owned by  
10 MARGOLIN, and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to  
11 present.

12 **RESPONSE TO INTERROGATORY NO. 5:**

13 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
14 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and  
15 seeks information that is neither relevant nor proportional to the needs of this case. This  
16 Interrogatory is also unduly burdensome as it seeks information outside of possession and  
17 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary  
18 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and  
19 private information regarding individuals who is not a named Respondents or who is not a party  
20 to this action, the disclosure of which would violate those individuals' or entities'  
21 constitutionally protected right to privacy. Without waiving any objections, Plaintiffs respond:  
22 on information and belief formed after a diligent review of Plaintiffs' records, Plaintiffs are not  
23 aware of any documents or communications responsive to this Interrogatory.

24 **INTERROGATORY NO. 6:**

25 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
26 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 **RESPONSE TO INTERROGATORY NO. 6:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
3 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and  
4 seeks information that is neither relevant nor proportional to the needs of this case. This  
5 Interrogatory is also unduly burdensome as it seeks information outside of possession and  
6 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary  
7 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and  
8 private information regarding individuals who is not a named Respondent. Without waiving any  
9 objections, Plaintiffs respond: see documents served with their Initial Disclosures and  
10 supplements thereto as WFZ 2599-2603. Plaintiffs may have had other communications  
11 responsive to this Interrogatory, but cannot recall the details of those communications.

12 **INTERROGATORY NO. 7:**

13 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
14 Communications between SATHSOWI T. KOROGHLI and KMT Relating To MARGOLIN,  
15 any court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN,  
16 and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

17 **RESPONSE TO INTERROGATORY NO. 7:**

18 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
19 grounds that it is compound with discrete subparts (4) and exceeds the limit under Fed. R. Civ. P.  
20 33(a)(1) for number of Interrogatories that may be propounded without leave by three (3)  
21 Interrogatories. This Interrogatory is also overly broad and vague as to scope, and seeks  
22 information that is neither relevant nor proportional to the needs of this case. This Interrogatory  
23 is also unduly burdensome as it seeks information outside of possession and control of Plaintiffs  
24 and that is more than a decade prior to Plaintiffs' filing of this Adversary Proceeding.  
25 Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and private  
26 information regarding individuals or entities who are not a party to this action, the disclosure of  
27 which would violate those individuals' or entities' constitutionally protected right to privacy.  
28 Without waiving any objections, Plaintiffs respond: on information and belief formed after a

1 diligent review of Plaintiffs' records, Plaintiffs are not aware of any documents or  
2 communications responsive to this Interrogatory.

3 **INTERROGATORY NO. 8:**

4 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
5 Communications between any of the PLAINTIFFS Relating To any purchase or potential  
6 purchase of any court judgment MARGOLIN has against ZANDIAN

7 **RESPONSE TO INTERROGATORY NO. 8:**

8 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
9 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
10 may be propounded without leave. This Interrogatory is also vague and ambiguous as to time  
11 and scope, overly broad and unduly burdensome. Plaintiffs further object to this Interrogatory to  
12 the extent it seeks information that is neither relevant nor proportional to the needs of this case.

13 Without waiving any objections, Plaintiffs respond: see documents served with their Initial  
14 Disclosures and supplements thereto as WFZ 2599-2603. Plaintiffs may have had other  
15 communications responsive to this Interrogatory, but cannot recall the details of those  
16 communications.

17 **INTERROGATORY NO. 9:**

18 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
19 Communications that Relate to ZANDIAN receiving any payment of any money or other  
20 consideration from "Pico Holdings."

21 **RESPONSE TO INTERROGATORY NO. 9:**

22 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
23 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
24 may be propounded without leave. This Interrogatory is also vague and ambiguous as to time  
25 and scope, overly broad and unduly burdensome. Plaintiffs further object to this Interrogatory to  
26 the extent it seeks information that is neither relevant nor proportional to the needs of this case as  
27 the information is not related to any fact material to the issues, claims and defenses in this  
28 Adversary Proceeding. Plaintiffs object to the extent information sought is protected by



1 privilege, including but not limited to the attorney-client privilege, the attorney work-product  
2 doctrine, or confidential proprietary, trade-secret, financial or commercially sensitive  
3 information.

4 **INTERROGATORY NO. 10:**

5 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
6 Communications that Relate to any payment of any money or other consideration from any  
7 PLAINTIFF to ZANDIAN.

8 **RESPONSE TO INTERROGATORY NO. 10:**

9 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
10 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
11 may be propounded without leave. This Interrogatory is also vague and ambiguous as to time  
12 and scope, overly broad and unduly burdensome. Plaintiffs further object to this Interrogatory to  
13 the extent it seeks information that is neither relevant nor proportional to the needs of this case as  
14 the information is not related to any fact material to the issues, claims and defenses in this  
15 Adversary Proceeding. Plaintiffs object to the extent information sought is protected by  
16 privilege, including but not limited to the attorney-client privilege, the attorney work-product  
17 doctrine, or confidential proprietary, trade-secret, financial or commercially sensitive  
18 information. Without waiving any objections, Plaintiffs respond: Plaintiffs have been paying  
19 Zandian's share of property taxes on the Pah Rah properties that are the subject of this  
20 Adversary. See also WFZ 2604-2609.

21 **INTERROGATORY NO. 11:**

22 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
23 Communications that support Your FIRST CAUSE OF ACTION contained in Your  
24 COMPLAINT.

25 **RESPONSE TO INTERROGATORY NO. 11:**

26 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
27 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
28 may be propounded without leave.

1 Without waiving any objections, Plaintiffs respond: Margolin's has no right, title or  
2 interest in the Pah Rah properties because his execution sales were void or voidable. First,  
3 Margolin's Default Judgment is facially defective pursuant to NRS 17.150(4) and is not effective  
4 in creating a judgment lien. As there was no valid judgment lien at the time of the execution  
5 sales, the execution sales themselves are void *ab initio*. Title of the Pah Rah properties are thus  
6 held by the Plaintiffs as to two-third interest as it was prior to the execution sales. Second, there  
7 is no proof that notice of sale was properly delivered pursuant to NRS 21.130 with regard to its  
8 execution sales. Thus, Margolin failed to comply with NRS 21.130 in properly conducting his  
9 execution sale, which resulted in no bidders attending the sale and allowing Margolin to  
10 purchase the properties for nominal values. Accordingly, the Margolin's has no valid lien and the  
11 execution sales should be set aside.

12 Alternatively, even if the execution sales are valid, Margolin acquired no more than what  
13 Zandian held at the time of the execution sales, which excluded Plaintiffs' two-third interest in  
14 the Pah Rah properties. Plaintiffs are not now, nor ever were, parties to the underlying action by  
15 which Margolin obtained his Default Judgment against Zandian, which provides the authority  
16 underlying his execution sales against Zandian's interest. Plaintiffs have never transferred any  
17 interest in the subject parcels to Zandian. Plaintiffs are not joint tenants with the Zandian. Thus,  
18 Margolin could not have acquired any interest held by Plaintiffs at the time of the execution  
19 sales, and Margolin substituted in place of or succeeded to Zandian's interest subject to claims  
20 by third-parties. The proof of these facts is a matter of public record and not subject to  
21 reasonable dispute. *See also* documents bates-stamped WFZ1 to WFZ2609 served with  
22 Plaintiffs' Initial Disclosures and supplements thereto.

23 **INTERROGATORY NO. 12:**

24 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
25 Communications that support Your SECOND CAUSE OF ACTION contained in Your  
26 COMPLAINT.

27 ///

28 ///

1 **RESPONSE TO INTERROGATORY NO. 12:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
4 may be propounded without leave. Without waiving any objections, Plaintiffs respond: *see*  
5 Response to Interrogatory No. 11 above.

6 **INTERROGATORY NO. 13:**

7 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
8 Communications that support Your THIRD CAUSE OF ACTION contained in Your  
9 COMPLAINT.

10 **RESPONSE TO INTERROGATORY NO. 13:**

11 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
12 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
13 may be propounded without leave. Without waiving any objections, Plaintiffs respond: *see*  
14 Response to Interrogatory No. 11 above. See also See also WFZ 2604-2609.

15 **INTERROGATORY NO. 14:**

16 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
17 Communications that support the PRAYER for relief contained in Your COMPLAINT.

18 **RESPONSE TO INTERROGATORY NO. 14:**

19 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
20 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
21 may be propounded without leave. Without waiving any objections, Plaintiffs respond: *see*  
22 Responses to Interrogatories 11-13 above. Investigation is continuing and this Response will be  
23 supplemented if and when appropriate.

24 **INTERROGATORY NO. 15:**

25 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
26 Communications that support paragraph 23 of Your COMPLAINT.

27 ///

28 ///

1 **RESPONSE TO INTERROGATORY NO. 15:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
4 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
5 Response to Interrogatory No. 11 above. Investigation is continuing and this Response will be  
6 supplemented if and when appropriate.

7 **INTERROGATORY NO. 16:**

8 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
9 Communications that support paragraph 24 of Your COMPLAINT.

10 **RESPONSE TO INTERROGATORY NO. 16:**

11 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
12 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
13 may be propounded without leave. Without waiving any objections, Plaintiffs respond: NRS  
14 21.130(c) requires *inter alia* Notice of Sale to be served, posted and published as follows (1)  
15 personal service or service by registered mail of the Notice of Sale upon each judgment debtor;  
16 (2) posting of a similar notice describing the property for 20 days successively in 3 public places  
17 of the township or city where property is situated/sold; (3) publication of the Notice of Sale three  
18 times, once each week, for 3 successive weeks in a newspaper in the county; and (4) recording a  
19 copy of the Notice of Sale in the office of the county recorder. In response to Plaintiffs'  
20 Requests for Production Nos. 5 and 6, Margolin failed to provide any evidence to show that the  
21 Notice of Sale was served, posted, published and recorded in accordance with requirements  
22 under subsection (c). Investigation is continuing and this Response will be supplemented if and  
23 when appropriate.

24 **INTERROGATORY NO. 17:**

25 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
26 Communications that support paragraph 34 of Your COMPLAINT.

27 ///

28 ///

1 **RESPONSE TO INTERROGATORY NO. 17:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
4 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
5 Response to Interrogatories 11 and 16 above. Investigation is continuing and this Response will  
6 be supplemented if and when appropriate.

7 **INTERROGATORY NO. 18:**

8 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
9 Communications that support paragraph 38 of Your COMPLAINT.

10 **RESPONSE TO INTERROGATORY NO. 18:**

11 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
12 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
13 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
14 Response to Interrogatories 11 and 16 above. Further, Plaintiffs never received a copy of the  
15 Notice of Sale related to the purported Sheriff's auction of the three parcels of land that is subject  
16 to this Adversary Proceeding. Investigation is continuing and this Response will be  
17 supplemented if and when appropriate.

18 **INTERROGATORY NO. 19:**

19 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
20 Communications that support paragraph 39 of Your COMPLAINT.

21 **RESPONSE TO INTERROGATORY NO. 19:**

22 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
23 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
24 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
25 Response to Interrogatories 11 and 16 above. Investigation is continuing and this Response will  
26 be supplemented if and when appropriate.

27 ///

28 ///

1 **INTERROGATORY NO. 20:**

2 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
3 Communications that support paragraph 40 of Your COMPLAINT.

4 **RESPONSE TO INTERROGATORY NO. 20:**

5 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
6 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
7 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
8 Response to Interrogatory 11 above. Investigation is continuing and this Response will be  
9 supplemented if and when appropriate.

10 **INTERROGATORY NO. 21:**

11 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
12 Communications that support paragraph 43 of Your COMPLAINT.

13 **RESPONSE TO INTERROGATORY NO. 21:**

14 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
15 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
16 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
17 Response to Interrogatories 11 and 16 above. Investigation is continuing and this Response will  
18 be supplemented if and when appropriate.

19 **INTERROGATORY NO. 22:**

20 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
21 Communications that support paragraph 44 of Your COMPLAINT.

22 **RESPONSE TO INTERROGATORY NO. 22:**

23 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
24 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
25 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
26 Response to Interrogatories 11 and 16 above. Investigation is continuing and this Response will  
27 be supplemented if and when appropriate.

28 ///

1 **INTERROGATORY NO. 23:**

2 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
3 Communications that support paragraph 45 of Your COMPLAINT.

4 **RESPONSE TO INTERROGATORY NO. 23:**

5 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
6 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
7 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
8 Response to Interrogatories 11 and 16 above. Investigation is continuing and this Response will  
9 be supplemented if and when appropriate.

10 **INTERROGATORY NO. 24:**

11 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
12 Communications that support paragraph 46 of Your COMPLAINT.

13 **RESPONSE TO INTERROGATORY NO. 24:**

14 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
15 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
16 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
17 Response to Interrogatories 11 and 16 above. Investigation is continuing and this Response will  
18 be supplemented if and when appropriate.

19 **INTERROGATORY NO. 25:**

20 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and  
21 Communications that support paragraph 47 of Your COMPLAINT.

22 **RESPONSE TO INTERROGATORY NO. 25:**

23 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
24 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that  
25 may be propounded without leave. Without waiving any objections, Plaintiffs respond: see  
26 Response to Interrogatories 11 above. Further, between August and October of 2013, Mr. Adam  
27 P. McMillen and Ms. Nancy Lindsley of the firm Watson Rounds, which represented Margolin  
28 as counsel, met and communicated with Ray Koroghli, Fred Sadri and Elias Abrishami regarding

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Plaintiffs' ownership interest in the Washoe County parcels that is the subject of this Adversary Proceeding. Investigation is continuing and this Response will be supplemented if and when appropriate.

DATED this 16th day of April, 2018.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li, Esq.

Dana Jonathon Nitz, Esq.  
Nevada Bar No. 0050  
Edgar C. Smith, Esq.  
Nevada Bar No. 5506  
Yanxiong Li, Esq.  
Nevada Bar No. 12807  
7785 W. Sahara Ave., Suite 200  
Las Vegas, NV 89117  
Tel: (702) 475-7964  
Fax: (702) 946-1345  
*Attorneys for Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli and Sathsowi T. Koroghli, in their individual capacities as well as Managing Trustees for Koroghli Management Trust*



VERIFICATION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STATE OF NEVADA        )  
                                  )        ss.  
COUNTY OF CLARK     )

I, Ray Koroghli, solely as Trustee of Koroghli Management Trust, being first duly sworn according to law, deposes and says:

I have read the foregoing **PLAINTIFFS' RESPONSES TO MARGOLIN'S FIRST SET OF INTERROGATORIES** and know the contents thereof, and that, based on the available sources of information, the same are true to the best of my knowledge, information and belief.

*Ray Koroghli*

Ray Koroghli, as Trustee of Koroghli Management Trust

SUBSCRIBED and SWORN to before me  
this 11<sup>th</sup> day of April, 2018.



*Cindy L Long*  
Notary Public in and for said  
County and State

STATE OF NEVADA        )  
                                  )        ss.  
COUNTY OF CLARK     )

I, Fred Sadri, solely as Trustee of Star Living Trust dated April 14, 1997, being first duly sworn according to law, deposes and says:

I have read the foregoing **PLAINTIFFS' RESPONSES TO MARGOLIN'S FIRST SET OF INTERROGATORIES** and know the contents thereof, and that, based on the available sources of information, the same are true to the best of my knowledge, information and belief.

Fred Sadri, as Trustee of Star Living Trust dated April 14, 1997

SUBSCRIBED and SWORN to before me  
this \_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Notary Public in and for said  
County and State

VERIFICATION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STATE OF NEVADA            )  
  )     ss.  
COUNTY OF CLARK         )

I, Ray Koroghli, solely as Trustee of Koroghli Management Trust, being first duly sworn according to law, deposes and says:

I have read the foregoing **PLAINTIFFS' RESPONSES TO MARGOLIN'S FIRST SET OF INTERROGATORIES** and know the contents thereof, and that, based on the available sources of information, the same are true to the best of my knowledge, information and belief.

\_\_\_\_\_  
Ray Koroghli, as Trustee of Koroghli Management Trust

SUBSCRIBED and SWORN to before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Notary Public in and for said  
County and State

\*\*\*\*\*

STATE OF NEVADA            )  
  )     ss.  
COUNTY OF CLARK         )

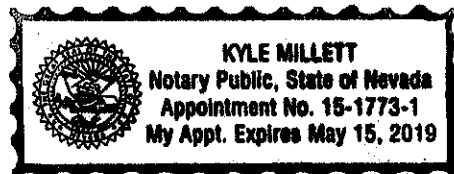
I, Fred Sadri, solely as Trustee of Star Living Trust dated April 14, 1997, being first duly sworn according to law, deposes and says:

I have read the foregoing **PLAINTIFFS' RESPONSES TO MARGOLIN'S FIRST SET OF INTERROGATORIES** and know the contents thereof, and that, based on the available sources of information, the same are true to the best of my knowledge, information and belief.

~~\_\_\_\_\_~~  
Fred Sadri, as Trustee of Star Living Trust dated April 14, 1997

SUBSCRIBED and SWORN to before me  
this 11<sup>th</sup> day of April, 2018.

[Signature]  
\_\_\_\_\_  
Notary Public in and for said  
County and State



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP, and that service of the foregoing **PLAINTIFFS’ RESPONSES TO DEFENDANT JED MARGOLIN’S FIRST SET OF INTERROGATORIES** was made on this 16th day of April, 2018, through the CM/ECF Electronic Filing system, and/or by depositing a true and correct copy in the United States Mail, addressed as follows:

Matthew D. Francis, Esq.  
Arthur A. Zorio, Esq.  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
5371 Kietzke Lane  
Reno, NV 89511  
*Attorney for Jed Margolin*

Jeffrey L. Hartman, Esq.  
HARTMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
*Attorney for Patrick Canet, Foreign Representativa  
and Jazi Gholamreza Zandian*

/s/ Kelli Wightman  
An Employee of WRIGHT, FINLAY & ZAK, LLP