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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.

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

21 **CHAPTER 15**

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

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

28 Plaintiffs,

29 **PLAINTIFFS' RESPONSES TO**  
30 **DEFENDANT JED MARGOLIN'S**  
31 **FIRST SET OF REQUESTS FOR**  
32 **PRODUCTION OF DOCUMENTS**

33 vs.

34 JED MARGOLIN; JAZI GHOLAMREZA  
35 ZANDIAN; and all other parties claiming an  
36 interest in real properties described in this  
37 action,

38 Defendants.

39 PATRICK CANET,

40 Counterclaimant,

41 vs.

42 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,

Counter-Defendants.

7 PATRICK CANET,

Cross-Claimant,

8 v.

9 JED MARGOLIN,

10 Cross-Defendant.  
11

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

18 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

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

24 1. Plaintiffs object to all Requests for Production of Documents based on the assertion that  
25 all Requests for Production of Documents are unlikely to lead to the discovery of admissible  
26 evidence related to issues of fact and law asserted in its Complaint.

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1 2. Plaintiffs object to the Requests to the extent they seek information and documents that  
2 are currently in Margolin's possession, custody, or control, or are, by reason of public filing,  
3 or otherwise, readily accessible to Margolin.

4 3. Plaintiffs object to the Requests to the extent they seek to require Plaintiffs to search for  
5 or produce information and documents which are not currently in their possession, custody,  
6 or control, or to identify or describe persons, entities, or events that are not known to them  
7 on the grounds that such request would seek to require more of Plaintiffs than any obligation  
8 imposed by law, would subject them to unreasonable and undue annoyance, oppression,  
9 burden, and expense, and would seek to impose upon Plaintiffs an obligation to investigate  
10 or discover information or materials from third-parties or sources that are equally accessible  
11 to Margolin.

12 4. Nothing herein shall be construed as an admission or waiver by Plaintiffs of: (a) their  
13 rights respecting admissibility, competency, relevance, privilege, materiality, and  
14 authenticity of any information provided in the Responses, any documents identified  
15 therein, or the subject matter thereof; and (b) their rights to object to the use of any  
16 information provided in the Responses, any document identified therein, or the subject  
17 matter contained in the Responses during a subsequent proceeding, including the trial of this  
18 or any other action.

19 5. The Responses are made solely for the purposes of, and in relation to, this litigation.

20 6. Plaintiffs object to the Requests to the extent they seek documents and information  
21 protected by the attorney-client privilege and/or seeks the work product of Counsel.

22 7. Plaintiffs may have not completed: (a) their investigation of facts, witnesses, or  
23 documents relating to this case, (b) discovery in this action, (c) their analysis of available  
24 data, and (d) their preparations for trial. Thus, although a good faith effort has been made to  
25 supply pertinent information where the same has been requested, it is not possible in some  
26 instances for unqualified Responses to be made to the Discovery Requests. Further, the  
27 Responses are necessarily made without prejudice to Plaintiffs' right to produce evidence of  
28 subsequently discovered facts, witnesses, or documents, as well as any new theories or

1 contentions that Plaintiffs may adopt. The Responses are further given without prejudice to  
2 Plaintiffs' right to provide information concerning facts, witnesses, or documents omitted by  
3 the Responses as a result of oversight, inadvertence, good faith error, or mistake.

4 In addition to all standing objections stated above, Plaintiffs respond to Margolin's  
5 Requests for Production of Documents as follows:

6 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

7 **REQUEST NO. 1:**

8 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
9 and Communications between the PLAINTIFFS, or any of them, Relating To MARGOLIN, any  
10 court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and  
11 any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

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

13 In addition to the General Objections, Plaintiffs further object to this Request on the  
14 grounds that it is overly broad and vague as to scope, and seeks production that is neither  
15 relevant nor proportional to the needs of this case. This Interrogatory is also unduly burdensome  
16 as it seeks documents or things outside of possession and control of Plaintiffs and that is more  
17 than a decade prior to Plaintiffs' filing of this Adversary Proceeding. Without waiving any  
18 objections, Plaintiffs respond: see documents served with their Initial Disclosures and  
19 supplements thereto as WFZ 2599-2603. Plaintiffs may have had other communications  
20 responsive to this Request, but cannot recall the details of those communications.

21 **REQUEST NO. 2:**

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

26 **RESPONSE TO REQUEST NO. 2:**

27 In addition to the General Objections, Plaintiffs further object to this Request on the  
28 grounds that it is overly broad and vague as to scope, and seeks production that is neither

1 relevant nor proportional to the needs of this case. This Interrogatory is also unduly burdensome  
2 as it seeks documents or things outside of possession and control of Plaintiffs and that is more  
3 than a decade prior to Plaintiffs' filing of this Adversary Proceeding. Without waiving any  
4 objections, Plaintiffs respond: see documents served with their Initial Disclosures and  
5 supplements thereto as WFZ 2599-2603. Plaintiffs may have had other communications  
6 responsive to this Request, but cannot recall the details of those communications.

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 **RESPONSE TO REQUEST NO. 3:**

14 In addition to the General Objections, Plaintiffs further object to this Request on the  
15 grounds that it is overly broad and vague as to scope, and seeks production that is neither  
16 relevant nor proportional to the needs of this case. This Interrogatory is also unduly burdensome  
17 as it seeks documents or things outside of possession and control of Plaintiffs and that is more  
18 than a decade prior to Plaintiffs' filing of this Adversary Proceeding. Without waiving any  
19 objections, Plaintiffs respond: on information and belief formed after a diligent review of  
20 Plaintiffs' records, Plaintiffs are not aware of any documents or communications responsive to  
21 this Request.

22 **REQUEST NO. 4:**

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

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1 **RESPONSE TO REQUEST NO. 4:**

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

10 **REQUEST NO. 5:**

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

16 **RESPONSE TO REQUEST NO. 5:**

17 In addition to the General Objections, Plaintiffs further object to this Request on the  
18 grounds that it is overly broad and vague as to scope, and seeks production that is neither  
19 relevant nor proportional to the needs of this case. This Interrogatory is also unduly burdensome  
20 as it seeks documents or things outside of possession and control of Plaintiffs and that is more  
21 than a decade prior to Plaintiffs' filing of this Adversary Proceeding. Without waiving any  
22 objections, Plaintiffs respond: on information and belief formed after a diligent review of  
23 Plaintiffs' records, Plaintiffs are not aware of any documents or communications responsive to  
24 this Request.

25 **REQUEST NO. 6:**

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

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

4 In addition to the General Objections, Plaintiffs further object to this Request on the  
5 grounds that it is overly broad and vague as to scope, and seeks production that is neither  
6 relevant nor proportional to the needs of this case. This Interrogatory is also unduly burdensome  
7 as it seeks documents or things outside of possession and control of Plaintiffs and that is more  
8 than a decade prior to Plaintiffs' filing of this Adversary Proceeding. 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 Request, but cannot recall the details of those communications.

12 **REQUEST NO. 7:**

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

18 **RESPONSE TO REQUEST NO. 7:**

19 In addition to the General Objections, Plaintiffs further object to this Request on the  
20 grounds that it is overly broad and vague as to scope, and seeks production that is neither  
21 relevant nor proportional to the needs of this case. This Interrogatory is also unduly burdensome  
22 as it seeks documents or things outside of possession and control of Plaintiffs and that is more  
23 than a decade prior to Plaintiffs' filing of this Adversary Proceeding. Without waiving any  
24 objections, Plaintiffs respond: on information and belief formed after a diligent review of  
25 Plaintiffs' records, Plaintiffs are not aware of any documents or communications responsive to  
26 this Request.

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1 **REQUEST NO. 8:**

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

5 **RESPONSE TO REQUEST NO. 8:**

6 In addition to the General Objections, Plaintiffs further object to this Request on the  
7 grounds that it is overly broad and vague as to time and scope, and seeks production that is  
8 neither relevant nor proportional to the needs of this case. This Interrogatory is also unduly  
9 burdensome as it seeks documents or things outside of possession and control of Plaintiffs.  
10 Without waiving any objections, Plaintiffs respond: see documents served with their Initial  
11 Disclosures and supplements thereto as WFZ 2599-2603. Plaintiffs may have had other  
12 communications responsive to this Request, but cannot recall the details of those  
13 communications.

14 **REQUEST NO. 9:**

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

18 **RESPONSE TO REQUEST NO. 9:**

19 In addition to the General Objections, Plaintiffs further object to this Request on the  
20 grounds that it is overly broad and vague as to time and scope, and seeks production that is  
21 neither relevant nor proportional to the needs of this case. This Interrogatory is also unduly  
22 burdensome as it seeks documents or things outside of possession and control of Plaintiffs. This  
23 Request is further objected to on the grounds that it seeks production of confidential proprietary  
24 documents or communications.

25 **REQUEST NO. 10:**

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



1 **RESPONSE TO REQUEST NO. 10:**

2 In addition to the General Objections, Plaintiffs further object to this Request on the  
3 grounds that it is overly broad and vague as to time and scope, and seeks production that is  
4 neither relevant nor proportional to the needs of this case. This Interrogatory is also unduly  
5 burdensome as it seeks documents or things outside of possession and control of Plaintiffs. This  
6 Request is further objected to on the grounds that it seeks production of confidential proprietary  
7 documents or communications. Without waiving any objections, Plaintiffs respond: see  
8 documents served with their Initial Disclosures and supplements thereto as WFZ 2604-2609.  
9 Plaintiffs may have had other communications responsive to this Request, but cannot recall the  
10 details of those communications.

11 **REQUEST NO. 11:**

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

15 **RESPONSE TO REQUEST NO. 11:**

16 Subject to the General Objections, Plaintiffs respond: *see* documents served with  
17 Plaintiffs' Initial Disclosures and supplements thereto, especially WFZ 57-173 (Judgment  
18 Confirming Arbitration Award); 174-193 (Stipulated Judgment in Zandian Action); 194-199  
19 (Quitclaim Deed to Koroghli Management Trust); 200-204 (Margolin's Default Judgment); 217-  
20 234 (Assessor Historical Value); 235-256 (Pleadings from Appeal of Zandian Action).

21 Investigation is continuing and this Response will be supplemented if and when appropriate.

22 Without waiving any objections, Plaintiffs respond: see documents served with their Initial  
23 Disclosures and supplements thereto as WFZ 1-2609. Plaintiffs may have had other  
24 communications responsive to this Request, but cannot recall the details of those  
25 communications.

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1 **REQUEST NO. 12:**

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

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

6 Subject to the General Objections, Plaintiffs respond: *see* Response to Request No. 11  
7 above. Investigation is continuing and this Response will be supplemented if and when  
8 appropriate.

9 **REQUEST NO. 13:**

10 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
11 and Communications that support Your THIRD CAUSE OF ACTION contained in Your  
12 COMPLAINT.

13 **RESPONSE TO REQUEST NO. 13:**

14 Subject to the General Objections, Plaintiffs respond: *see* Response to Request No. 11  
15 above. See also WFZ 2604-2609. Investigation is continuing and this Response will be  
16 supplemented if and when appropriate.

17 **REQUEST NO. 14:**

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

20 **RESPONSE TO REQUEST NO. 14:**

21 Subject to the General Objections, Plaintiffs respond: *see* Response to Request No. 11-13  
22 above. Investigation is continuing and this Response will be supplemented if and when  
23 appropriate.

24 **REQUEST NO. 15:**

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

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

2 Subject to the General Objections, Plaintiffs respond: *see* “JM\_0496-521 Ex 8 - Default  
3 Judgment recorded” served with Margolin’s Initial Disclosure of Documents and supplements  
4 thereto. See also, Response to Request No. 11 above. Investigation is continuing and this  
5 Response will be supplemented if and when appropriate.

6 **REQUEST NO. 16:**

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

11 **RESPONSE TO REQUEST NO. 16:**

12 Subject to the General Objections, Plaintiffs respond: *see* Margolin’s Responses to  
13 Request for Production Nos. 5 and 6, and documents referenced therein. Investigation is  
14 continuing and this Response will be supplemented if and when appropriate.

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 **RESPONSE TO REQUEST NO. 17:**

20 Subject to the General Objections, Plaintiffs respond: *see* Response to Request No. 11  
21 and 16 above. Investigation is continuing and this Response will be supplemented if and when  
22 appropriate.

23 **REQUEST NO. 18:**

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

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1 **RESPONSE TO REQUEST NO. 18:**

2 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
3 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
4 when appropriate.

5 **REQUEST NO. 19:**

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

10 **RESPONSE TO REQUEST NO. 19:**

11 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
12 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
13 when appropriate.

14 **REQUEST NO. 20:**

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

19 **RESPONSE TO REQUEST NO. 20:**

20 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
21 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
22 when appropriate.

23 **REQUEST NO. 21:**

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

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1 **RESPONSE TO REQUEST NO. 21:**

2 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
3 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
4 when appropriate.

5 **REQUEST NO. 22:**

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

10 **RESPONSE TO REQUEST NO. 22:**

11 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
12 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
13 when appropriate.

14 **REQUEST NO. 23:**

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

19 **RESPONSE TO REQUEST NO. 23:**

20 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
21 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
22 when appropriate.

23 **REQUEST NO. 24:**

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

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1 **RESPONSE TO REQUEST NO. 24:**

2 Subject to the General Objections, Plaintiffs respond: see Response to Request Nos. 11,  
3 15 and 16 above. Investigation is continuing and this Response will be supplemented if and  
4 when appropriate.

5 **REQUEST NO. 25:**

6 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
7 and Communications that support paragraph 47 of Your COMPLAINT that “Margolin has  
8 actual, constructive or inquiry notice of Plaintiffs’ interest in the Property, which prevents  
9 Margolin from being deemed a bona fide purchaser for value.”

10 **RESPONSE TO REQUEST NO. 25:**

11 Subject to the General Objections, Plaintiffs respond: see Response to Request No. 11,  
12 above. Investigation is continuing and this Response will be supplemented if and when  
13 appropriate.

14 **REQUEST NO. 26:**

15 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
16 and Communications between the PLAINTIFFS, or any of them, and CANET, Relating To any  
17 real property that is the subject of this adversary proceeding.

18 **RESPONSE TO REQUEST NO. 26:**

19 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
20 grounds that it is overly broad and vague as to scope, and seeks information that is neither  
21 relevant nor proportional to the needs of this case. Without waiving any objections, Plaintiffs  
22 respond: other than pleadings and disclosures served on Margolin in this Adversary Proceeding,  
23 no documents or communications responsive to this Request.

24 **REQUEST NO. 27:**

25 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
26 and Communications between the PLAINTIFFS, or any of them, and CANET, Relating To any  
27 change in ownership of any real property that is the subject of this adversary proceeding.

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1 **RESPONSE TO REQUEST NO. 27:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
3 grounds that it is overly broad and vague as to scope, and seeks information that is neither  
4 relevant nor proportional to the needs of this case. Without waiving any objections, Plaintiffs  
5 respond: other than pleadings and disclosures served on Margolin in this Adversary Proceeding,  
6 no documents or communications responsive to this Request.

7 **REQUEST NO. 28:**

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

11 **RESPONSE TO REQUEST NO. 28:**

12 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
13 grounds that it is overly broad and vague as to scope, and seeks information that is neither  
14 relevant nor proportional to the needs of this case. Without waiving any objections, Plaintiffs  
15 respond: not aware of any documents responsive to this Request.

16 **REQUEST NO. 29:**

17 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
18 and Communications between the PLAINTIFFS, or any of them, and CANET, Relating To  
19 MARGOLIN.

20 **RESPONSE TO REQUEST NO. 29:**

21 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the  
22 grounds that it is overly broad and vague as to scope, and seeks information that is neither  
23 relevant nor proportional to the needs of this case. Without waiving any objections, Plaintiffs  
24 respond: other than pleadings and disclosures served on Margolin in this Adversary Proceeding,  
25 no documents or communications responsive to this Request.

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1 **REQUEST NO. 30:**

2 Produce all Documents and things Relating To any non-privileged Documents, Writings,  
3 and Communications between the PLAINTIFFS, or any of them, and CANET, Relating To this  
4 adversary proceeding.

5 **RESPONSE TO REQUEST NO. 30:**

6 Subject to the General Objections, Plaintiffs further object to this Interrogatory on the  
7 grounds that it is unduly burdensome to the extent it seeks documents equally accessible and  
8 already in possession of Margolin. This Request serves no purpose other than to harass  
9 Plaintiffs. Without waiving any objections, Plaintiffs respond: other than pleadings and  
10 disclosures served on Margolin in this Adversary Proceeding, no documents or communications  
11 responsive to this Request.

12 **REQUEST NO. 31:**

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

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1 **RESPONSE TO REQUEST NO. 31:**

2 Subject to General Objections, Plaintiffs respond: see Responses to Request Nos. 11, 15  
3 and 16 above. Investigation is continuing and this Response will be supplemented if and when  
4 appropriate.

5  
6 DATED this 16th day of April, 2018.

7 WRIGHT, FINLAY & ZAK, LLP

8  
9 /s/ Yanxiong Li, Esq.

10 Dana Jonathon Nitz, Esq.

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18 *Attorneys for Plaintiffs/Counter-Defendants, Fred*  
19 *Sadri, both in his individual capacity and as Trustee*  
20 *for The Star Living Trust, dated April 14, 1997; Ray*  
21 *Koroghli and Sathsowi T. Koroghli, in their*  
22 *individual capacities as well as Managing Trustees*  
23 *for Koroghli Management Trust*  
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**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 REQUESTS FOR PRODUCTION OF DOCUMENTS** was made on this 16<sup>th</sup> 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:

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