

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

10 Attorneys for *Plaintiffs*, Fred Sadri, as Trustee for The Star Living Trust, dated April 14, 1997;  
11 Ray Koroghli and Sathsowi T. Koroghli, as Managing Trustees for Koroghli Management Trust

12 **UNITED STATES BANKRUPTCY COURT**  
13 **DISTRICT OF NEVADA**

14 In re: JAZI GHOLAMREZA ZANDIAN,  
15  
16 Debtor.

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

**Chapter 15**

Adversary No.: **17-05016-btb**

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

**LIS PENDENS**

22 Plaintiffs,

23 vs.

24 JED MARGOLIN; JAZI GHOLAMREZA  
25 ZANDIAN; and all other parties claiming an  
26 interest in real properties described in this  
27 action.

28 Defendant.

1 PLEASE TAKE NOTICE that Plaintiffs, Fred Sadri, as Trustee for The Star Living  
2 Trust, dated April 14, 1997; Ray Koroghli and Sathsowi T. Koroghli, as Managing Trustees for  
3 Koroghli Management Trust (hereinafter “Plaintiffs”), by and through their attorneys of record,  
4 Dana J. Nitz, Esq. and Yanxiong Li, Esq., of the law firm of Wright, Finlay & Zak, LLP,  
5 complains against JED MARGOLIN and JAZI GHOLAMREZA ZANDIAN (hereinafter  
6 “Defendants”) in the above-entitled action concerning and affecting title to real property as  
7 described herein. Plaintiff’s Complaint was filed on May 25, 2017. The above-captioned matter  
8 is pending in the United States Bankruptcy Court, District of Nevada, located at 300 Booth  
9 Street, Reno, NV 89509.

10 This action, and the affirmative relief that Plaintiff’s requests in its Complaint, affects  
11 title to specific real properties and the right to possession of specific real properties situated in  
12 Washoe County, Nevada particularly described as:

13 *See Exhibit A attached hereto*

14 In their Complaint, Plaintiffs have asked the Court to provide the following affirmative  
15 relief:

- 16 1. For a declaration and determination that Plaintiffs’ two-thirds ownership interest  
17 is co-equal or superior to Defendants’ interest in the Property, and that Plaintiffs’  
18 ownership interest were not extinguished by the Sheriff Sales;
- 19 2. For a declaration and determination that Defendants’ interest, and any and all  
20 successors’ interest, in the Property, if any, is subject to Plaintiffs’ two-thirds  
21 ownership interest in the Property;
- 22 3. For a declaration and determination that the Sheriffs’ Sales were invalid to the  
23 extent it purports to convey the Property to Margolin free and clear of Plaintiffs’  
24 interest, rights or claims;
- 25 4. In the alternative, for a declaration and determination that the Sheriff’s Sales  
26 were void, invalid and/or should be set aside and conveyed no legitimate interest  
27 to Margolin;

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5. For a preliminary injunction that Defendants, their successors, assigns, and agents are prohibited from conducting a sale or transfer of the Property and representing the sale is free and clear of the Plaintiffs' ownership interest, unless Defendants tender payment of the value in the Property interest owned by Plaintiffs;
6. For a preliminary injunction that Defendants, their successors, assigns, and agents pay all taxes, insurance and homeowner's association dues during the pendency of this action;
7. For general and special damages;
8. For attorney's fees;
9. For costs incurred herein, including post-judgment costs; and
10. For any and all further relief deemed appropriate by this Court.

DATED this 5th day of July, 2017.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li, Esq.  
Dana Jonathon Nitz, Esq.  
Nevada Bar No. 0050  
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,  
*Fred Sadri, as Trustee for The Star Living Trust,  
dated April 14, 1997; Ray Koroghli and Sathsowi T.  
Koroghli, as Managing Trustees for Koroghli  
Management Trust*

**CERTIFICATE OF SERVICE**

I, Kelli Wightman, am an employee of Wright, Finlay & Zak, LLP and I certify under penalty of perjury that the foregoing statement is true and correct:

1. On July 5, 2017, I served the following document(s):

**LIS PENDENS**

2. I served the above-named document(s) by the following means to the persons as listed below:

(Check all that apply)

a. ECF System (You must attach the "Notice of Electronic Filing", or list all persons and address and attach additional paper if necessary)

See attached: U.S. Bankruptcy Court Proof of Service for 17-05016-btb

3. On July 5, 2017, I served the above-named document(s) by the following means to the persons as listed below:

■ b. United States mail, postage fully pre-paid (List persons and addresses. Attach additional paper if necessary)

JED MARGOLIN  
c/o Brownstein Hyatt Farber Schreck, LLP  
Attn: Adam P. McMillen, Esq.  
5371 Kietzke Lane  
Reno, NV 89511

JAZI GHOLAMREZA ZANDIAN  
6 RUE EDOUARD FOURNIER  
PARIS

STEVE E. ABELMAN on behalf of Creditor JED MARGOLIN  
BROWNSTEIN HYATT FARBER SCHRECK  
410 17th STREET, STE 2200  
DENVER, CO 80241

4. That such mailing was accomplished by first class mail, pre-paid, in a sealed envelope.

5. I declare under penalty of perjury that the foregoing is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on this 5<sup>th</sup> day of July, 2017.

/s/ Kelli Wightman  
An employee of Wright, Finlay & Zak, LLP

# **EXHIBIT A**

# **EXHIBIT A**

**EXHIBIT "A"**

All that real property situate in the County of Washoe, State of Nevada, described as follows:

**PARCEL A:**

A.P.N. 079-150-09

The Northeast ¼ and the South ½ of the Northwest ¼ and the South ½ in Section 33, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL B:**

A.P.N. 079-150-10

Section 31, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

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**PARCEL C:**

A.P.N. 079-150-13

The Northeast ¼; South ½ of the Northwest ¼; South ½ of Section 27, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL D:**

A.P.N. 084-040-02

Section 5, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

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**PARCEL E:**

A.P.N. 084-040-04

Section 3, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL F:**

A.P.N. 084-040-06

Section 1, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

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**PARCEL G:**

A.P.N. 084-040-10

The North ½ and the North ½ of the Northwest ¼ of the Southwest ¼ and the Southwest ¼ of the Northwest ¼ of the Southwest ¼ and the North ½ of the Northeast ¼ of the Southwest ¼ and the North ½ of the Northwest ¼ of the Southeast ¾ all in Section 11, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL H:**

A.P.N. 084-130-07

The Northwest ¼ and the North ½ of the Southwest ¼ and the Government Lot 1 in the Southwest ¼ of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

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**PARCEL I:**

A.P.N. 084-140-17

The Northeast ¼ of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.