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10 *Attorneys for Fred Sadri, both in his individual  
11 capacity and as Trustee for The Star Living  
12 Trust, dated April 14, 1997; Ray Koroghli,  
13 individually; and Ray Koroghli and Sathsowi T.  
14 Koroghli, in their individual capacities as well  
15 as Managing Trustees for Koroghli  
16 Management Trust*

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

13 In re: JAZI GHOLAMREZA ZANDIAN,  
14 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,

**AMENDED STANDARD DISCOVERY  
PLAN**

21 Plaintiffs,

22 vs.

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

27 Defendant.

28 PATRICK CANET,

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Counter-claimant,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS  
CAPACITY AS TRUSTEE OF THE STAR  
LIVING TRUST AND RAY KOROGHLI  
INDIVIDUALLY, AND RAY KOROGHLI  
AND SATHSOWI T. KOROGHLI AS  
MANAGING TRUSTEES OF THE  
KOROGHLI MANAGEMENT TRUST

Counter-defendant.

PATRICK CANET,

Cross-claimant,

vs.

JED MARGOLIN,

Cross-defendant.

1           1.       The Parties agree to the standard discovery plan below. The first defendant  
 2 answered or otherwise appeared on June 29, 2017. Discovery shall be completed within 240  
 3 days, measured from the date the first defendant answered or otherwise appeared. **Discovery**  
 4 **will close by February 26, 2018.**<sup>1</sup>

5	Last day for parties to serve initial disclosures	9/21/2017
6	Last day for parties to amend pleadings or add parties	11/28/2017
7	Last day for parties to serve initial expert disclosures	12/28/2017
8	Last day for parties to serve rebuttal expert disclosures	1/29/2018
9	Last day for parties to file dispositive motions	3/28/2018
10	Last day for parties to file their joint pretrial order	4/27/2018

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 13           2.       Nature of the Case: Quiet Title; Contract.

14           3.       Jury Trial: A demand for a jury trial has been made pursuant to Fed. R. Civ. P.  
 15 38(b), and in conformity with LR 9015, but one or more of the parties does not consent to a jury  
 16 trial pursuant to 28 U.S.C. § 157(e).

17           4.       Additional Pleadings: The Parties do not contemplate any additional pleadings  
 18 at this time.

19           5.       Settlement Conference: Settlement cannot be evaluated prior to additional  
 20 discovery. The Parties may later request a settlement conference.

21           6.       Trial: The case should be ready for trial by April 27, 2018 and should take 1-2  
 22 days.

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 27 <sup>1</sup> Parties recognize that the standard discovery period is 120 days after the answer or first  
 28 appearance by the first defendant, but jointly request an additional 120 days based on the  
 complexity of issues, claims and defenses pending. Parties otherwise submit this plan in  
 accordance with limitations under LR 7026.

1 7. All Parties consent to this Court entering final judgment.

2 DATED this 21st day of August, 2017.

DATED this 21st day of August, 2017.

3 **WRIGHT, FINLAY & ZAK, LLP**

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

4  
5 /s/ Yanxiong Li, Esq.

/s/ Adam McMillen, Esq.

6 Edgar C. Smith, Esq.

Adam McMillen, Esq.

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12 Attorneys for *Fred Sadri, both in his individual  
13 capacity and as Trustee for The Star Living  
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15 individually; and Ray Koroghli and Sathsowi T.  
16 Koroghli, in their individual capacities as well  
17 as Managing Trustees for Koroghli  
18 Management Trust*

15 DATED this 21st day of August, 2017.

16 **HARTMAN & HARTMAN**

17  
18 /s/ Jeffrey L. Hartman, Esq.

19 Jeffrey L. Hartman, Esq.

20 Nevada Bar No. 1607

21 510 W. Plumb Ln., Ste. B

22 Reno, Nevada 89509

23 Attorney for *Patrick Canet*

**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 August 22, 2017, I served the following document(s):

**STANDARD DISCOVERY PLAN**

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)

3. On August 22, 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

Jeffrey L. Hartman, Esq.  
HARTMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
*Attorney for Patrick Canet*

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 22nd day of August, 2017.

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