

1 Matthew D. Francis  
Nevada Bar No. 6978  
2 [mfrancis@bhfs.com](mailto:mfrancis@bhfs.com)  
Arthur A. Zorio  
3 Nevada Bar No. 6547  
[azorio@bhfs.com](mailto:azorio@bhfs.com)  
4 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
5371 Kietzke Lane  
5 Reno, NV 89511  
Telephone: 775.324.4100  
6 Facsimile: 775.333.8171

7 *Attorneys for JED MARGOLIN*

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9  
10 **IN THE UNITED STATES BANKRUPTCY COURT**  
11 **FOR THE DISTRICT OF NEVADA**

12 In Re JAZI GHOLAMREZA ZANDIAN,  
13 Debtor.

BK-N-16-50644-BTB  
Chapter 15

Adversary Proceeding: 17-05016-BTB

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

**STIPULATION FOR EXTENSION OF TIME**  
**FOR CROSS-DEFENDANT JED MARGOLIN**  
**TO RESPOND TO CROSS-CLAIMANT**  
**PATRICK CANET'S OPPOSITION TO**  
**MOTION FOR SUMMARY JUDGMENT AND**  
**COUNTER MOTION FOR SUMMARY**  
**JUDGMENT**

19 Plaintiffs,

[FIRST REQUEST]

20 v.

21 JED MARGOLIN; JAZI GHOLAM REZA  
22 ZANDIAN; and all other parties claiming  
an interest in real properties described in  
this action,

**Hearing Date: May 24, 2018**  
**Hearing Time: 10 a.m**

23 Defendants.  
24 \_\_\_\_\_/

25 PATRICK CANET,

26 Counterclaimant,

27 v.

28 FRED SADRI, INDIVIDUALLY AND AS  
TRUSTEE FOR THE STAR LIVING  
TRUST; RAY KOROGHLI,

1 INDIVIDUALLY; RAY KOROGHLI  
 2 AND SATHSOWI T. KOROGHLI, AS  
 3 MANAGING TRUSTEES FOR  
 4 KOROGHLI MANAGEMENT TRUST,  
 5  
 6 Counter-Defendants.  
 7  
 8  
 9 PATRICK CANET,  
 10  
 11 Cross-Claimant,  
 12  
 13 v.  
 14  
 15 JED MARGOLIN,  
 16  
 17 Cross-Defendant.

12 Defendant/Cross-Defendant Jed Margolin (“Mr. Margolin”) and Defendant/Cross-  
 13 Claimant Patrick Canet (“Mr. Canet”), by and through their respective counsels of record, hereby  
 14 jointly stipulate and submit this request for a seven (7) day extension of time for Mr. Margolin to  
 15 respond to Cross-Claimant Patrick Canet’s Opposition to Cross-Defendant Jed Margolin’s  
 16 Motion for Summary Judgment and Counter Motion for Summary Judgment (ECF Nos. 34 and  
 17 35). Mr. Margolin’s Response is currently due April 25, 2018, and the parties respectfully  
 18 request that Mr. Margolin be allowed until and through May 2, 2018 to file his response. Mr.  
 19 Margolin’s Motion for Summary Judgment against Cross-Claimant Patrick Canet was filed on  
 20 March 21, 2018. *See* ECF Nos. 23-24. Mr. Canet’s Opposition to Cross-Defendant Jed  
 21 Margolin’s Motion for Summary Judgment and Counter Motion for Summary Judgment was filed  
 22 on April 11, 2018. *See* ECF Nos. 34-35.

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BROWNSTEIN HYATT FARBER SCHRECK, LLP  
 5371 Kietzke Lane  
 Reno, NV 89511  
 775.324.4100

1 This is the parties' first request for extension and is not submitted for the purpose of  
2 causing undue delay or prejudice.

3 DATED this 19<sup>th</sup> day of April, 2018.

DATED this 19<sup>th</sup> day of April, 2018.

4 **HARTMAN & HARTMAN**

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

5  
6 /s/ Jeffrey L. Hartman  
7 Jeffrey L. Harman, Esq.  
8 Nevada Bar No. 1607  
9 510 West Plumb Lane, Suite B  
10 Reno, NV 89509  
11 *Attorneys for Patrick Canet*

/s/ Matthew D. Francis, Esq.  
Matthew D. Francis, Esq.  
Nevada Bar No. 6978  
Arthur A. Zorio, Esq.  
Nevada Bar No. 6547  
5371 Kietzke Lane  
Reno, NV 89511  
Attorneys for *Jed Margolin*

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
5371 Kietzke Lane  
Reno, NV 89511  
775.324.4100

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Reno, NV 89511  
775.324.4100

**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 19<sup>th</sup> day of April, 2018, I served the document entitled **STIPULATION FOR EXTENSION OF TIME FOR CROSS-DEFENDANT JED MARGOLIN TO RESPOND TO CROSS-CLAIMANT PATRICK CANET’S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT AND COUNTER MOTION FOR SUMMARY JUDGMENT** 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:

Dana Jonathon Nitz, Esq.  
Yanxiong Li, Esq.  
Wright, Finlay & Zak, LLP  
7785 W. Sahara Avenue., Suite 200  
Las Vegas, NV 89117  
[yli@wrightlegal.net](mailto:yli@wrightlegal.net)

Jeffrey L. Harman, Esq.  
HARMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
[notices@bankruptcyreno.com](mailto:notices@bankruptcyreno.com)

**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:

/s/ Nancy R. Lindsley  
Employee of Brownstein Hyatt Farber  
Schreck, LLP

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