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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**

12 In re: JAZI GHOLAMREZA ZANDIAN,  
13  
14 Debtor.

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

**Chapter 15**

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

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

**STIPULATION TO CONTINUE  
HEARING ON MOTION FOR  
SUMMARY JUDGMENT**

Current Hearing Date: May 24, 2018  
Current Hearing Time: 10:00 a.m.

20 Plaintiffs,

21 vs.

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

25 Defendant.

26 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.

COMES NOW, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and Ray Koroghli and Sathsowi T. Koroghli, in their individual capacities as well as Managing Trustees for Koroghli Management Trust (hereinafter “PLAINTIFF”) and Defendant, Jed Margolin (“MARGOLIN”) and Counterclaimant/Cross-Claimant, Patrick Canet (“CANET:”) (collectively, the “Parties”), by and through their respective counsels of record, hereby jointly submit this request to a continuance of the hearing on Cross-Defendant Jed Margolin’s Motion for Summary Judgment Against Cross-Claimant Patrick Canet [ECF No. 23] and Cross-Claimant Patrick Canet’s

1 Counter-Motion for Summary Judgment (the “Motions”) currently scheduled to be heard on May  
2 24, 2018, at 10:00 a.m. so as to be heard at the same time as PLAINTIFF’s Motion for Partial  
3 Summary Judgment on Plaintiff’s Quiet Title/Declaratory Relief Cause of Action [ECF No. 39]  
4 currently scheduled to be heard on June 13, 2018 at 2:00 p.m.

5 The Parties hereby stipulate and agree to the following terms:

6 IT IS HEREBY STIPULATED AND AGREED that the hearing on the Motions  
7 scheduled for May 24, 2018, at 10:00 a.m., will be continued to June 13, 2018, at 2:00 p.m.  
8

9 IT IS HEREBY STIPULATED AND AGREED that pursuant to LR 9014(d)(2),  
10 Defendant CANET’s deadline to file and serve his reply to MARGOLIN’s Opposition to his  
11 Counter-Motion will be 7 days preceding the continued hearing date of June 13, 2018 at 2:00  
12 p.m.

13 IT IS HEREBY STIPULATED AND AGREED that pursuant to LR 9014(d)(1),  
14 Defendant MARGOLIN’s deadline to file and serve his Opposition to PLAINTIFF’s Motion  
15 will be 14 days preceding the current hearing date of June 13, 2018 at 2:00 p.m..  
16

17 IT IS HEREBY STIPULATED AND AGREED that pursuant to LR 9014(d)(2),  
18 PLAINTIFF’s deadline to file its reply to DEFENDANT’s Opposition will be 7 days preceding  
19 the current hearing date of June 13, 2018 at 2:00 p.m.

20 IT IS HEREBY STIPULATED AND AGREED that as provided by the Fed. R. Bankr. P.  
21 7062, this Stipulation shall be effective and enforceable immediately upon entry.

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1 IT IS HEREBY STIPULATED AND AGREED that this Court retains jurisdiction to  
2 hear all matters related to or arising from the entry of this Stipulation.

3 IT IS HEREBY STIPULATED AND AGREED that nothing in this Stipulation shall  
4 serve as a waiver of any right, argument, or remedy belonging to any of the Parties.

5  
6 DATED this 7th day of May, 2018.

DATED this 7th day of May, 2018.

7 **WRIGHT, FINLAY & ZAK, LLP**

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

8  
9 /s/ Yanxiong Li, Esq.

/s/ Matthew D. Francis, Esq.

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Matthew D. Francis, Esq.

11 Nevada Bar No. 5506

Nevada Bar No. 6978

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Reno, NV 89511

16 Attorneys for *Fred Sadri, both in his individual  
17 capacity and as Trustee for The Star Living*

Attorneys for *Jed Margolin*

18 *Trust, dated April 14, 1997; Ray Koroghli,*

19 *individually; and Ray Koroghli and Sathsowi T.*

20 *Koroghli, in their individual capacities as well*

21 *as Managing Trustees for Koroghli*

22 *Management Trust*

23  
24 DATED this 7th day of May, 2018.

25  
26 **HARTMAN & HARTMAN**

27 /s/ Jeffrey L. Hartman, Esq.

Jeffrey L. Hartman, Esq.

Nevada Bar No. 1607

510 West Plumb Lane, Suite B

Reno, NV 89509

Attorneys 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 May 7, 2018, I served the following document(s):  
**STIPULATION TO CONTINUE HEARING ON MOTION FOR SUMMARY JUDGMENT**

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 May 7, 2018, 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: Matthew D. Francis, 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 7th day of May, 2018.

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