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

15 **UNITED STATES BANKRUPTCY COURT**  
16 **DISTRICT OF NEVADA**

17 In re: JAZI GHOLAMREZA ZANDIAN,  
18  
19 Debtor.

20 Case No.: 16-50644-btb  
21 Chapter 15  
22 Adversary No.: 17-05016-btb

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

28 **EX PARTE MOTION FOR ORDER**  
**SHORTENING TIME TO HEAR**  
**MOTION TO WITHDRAW AS**  
**COUNSEL**

Plaintiffs,

vs.

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

Defendant.

PATRICK CANET,

Counter-claimant,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS  
CAPACITY AS TRUSTEE OF THE STAR  
LIVING TRUST AND RAY KOROGHLI  
INDIVIDUALLY, AND RAY KOROGHLI

1 AND SATHSOWI T. KOROGHLI AS  
2 MANAGING TRUSTEES OF THE  
3 KOROGHLI MANAGEMENT TRUST

Counter-defendant.

4 PATRICK CANET,

5 Cross-claimant,

6 vs.

7 JED MARGOLIN,

8 Cross-defendant.

9  
10 Movant, the law firm of Wright Finlay & Zak, LLP (hereinafter “WFZ”) by and  
11 through its counsel of record, Yanxiong Li, Esq. of Wright, Finlay & Zak, LLP, hereby moves  
12 this Court for an Order Shortening Time for Hearing on its Motion for Withdrawal as Counsel  
13 for Plaintiffs/Counterclaimants in Adversary Proceeding and the Chapter 15 Bankruptcy Case.

14 This Motion is based upon the attached Memorandum of Points and Authorities and all  
15 documents filed in support of the Motion.

16 DATED this 17<sup>th</sup> day of September, 2019.

17 WRIGHT, FINLAY & ZAK, LLP

18 /s/ Yanxiong Li

19 Yanxiong Li, Esq.

20 Nevada Bar No. 12807

21 7785 W. Sahara Ave., Ste. 200

22 Las Vegas, NV 89117

23 *Attorney for Plaintiffs/Counter-Defendants*

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTORY STATEMENT**

Movant, WFZ, pursuant to Bankruptcy Rule 9006 and Local Rule 9006, seeks an order shortening time for the hearing on its **MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFFS/COUNTERDEFENDANTS**. The hearing on the Motion is expected to take approximately 5 minutes.

**II. LEGAL STANDARD**

FRBP 9006(c)(1) states,

Except as provided in paragraph (2) of this subdivision, when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced.

Courts have generally acknowledged that such expedited relief does not violate due process rights, even if the motion to shorten time is made *ex parte*. "Bankruptcy Rule 9006(c) permits the bankruptcy court 'for cause shown' in its discretion, with or without motion or notice, to reduce the notice period, and *ex parte* motions for material reductions in the notice period are routinely granted by bankruptcy courts." *Hester v. NCNB Texas Nat'l Bank* (In re *Hester*), 899 F.2d 361, 364 n. 3 (5th Cir. 1990); *see also* 9 COLLIER ON BANKRUPTCY 9006.07 (Lawrence P. King ed., 15th ed. 1995); In re *Gledhill*, 76 F.3d 1070 (10th Cir. 1996).

Good cause exists because this Court has a scheduled hearing on October 1, 2019 to hear the Amended Motion to Dismiss. Further, due to the matters raised herein, including without limitation, the clients' consent to withdrawal of counsel, WFZ's intent to prepare/argue the Opposition to pending Amended Motion to Dismiss and there are no other deadlines in the Adversary Proceeding or Chapter 15 Bankruptcy Case.

**III. COUNSEL HAS CONFERRED WITH ALL PARTIES**

Wright, Finlay & Zak, LLP has requested and obtained approval for the order shortening time from all parties that have appeared and its clients in the instant case, as indicated on the accompanying Attorney Information Sheet.

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**IV. CONCLUSION**

Movant respectfully requests that this Court grant the instant *Ex Parte* Motion for Order Shortening Time for Hearing on Motion to Withdraw as Counsel.

DATED this 17<sup>th</sup> day of September, 2019.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li  
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