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

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

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

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

**CHAPTER 15**

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

**Adv. No. 17-05016-btb**

**PLAINTIFF'S FIRST SUPPLEMENT TO  
THEIR INITIAL DISCLOSURE OF  
WITNESSES AND DOCUMENTS**

23 Plaintiffs,

24 vs.

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

Defendants.

PATRICK CANET,

Counterclaimant,

vs.

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

1 INDIVIDUALLY, AND RAY KOROGHLI  
2 AND SATHSOWI T. KOROGHLI AS  
3 MANAGING TRUSTEES OF THE  
4 KOROGHLI MANAGEMENT TRUST,

Counter-Defendants.

5 PATRICK CANET,

6 Cross-Claimant,

7 v.

8 JED MARGOLIN,

9 Cross-Defendant.  
10

11 COMES NOW Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity  
12 and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and  
13 Ray Koroghli and Sathsowi T. Koroghli, as Managing Trustees for Koroghli Management Trust  
14 (hereinafter "Plaintiffs"), by and through their attorneys of record, Dana Jonathon Nitz, Esq. and  
15 Yanxiong Li, Esq., of the law firm of Wright, Finlay & Zak, LLP hereby submits their **FIRST**  
16 **SUPPLEMENT** to their initial disclosure of witnesses and documents: (New items appear in  
17 **BOLD**):

18 **A. INDIVIDUALS LIKELY TO HAVE INFORMATION DISCOVERABLE UNDER**  
19 **Fed. R. Bankr. P. 7026 and Fed. R. Civ. P. 26(f).**

- 20 1. Fred Sadri  
21 c/o Yanxiong Li, Esq.  
22 WRIGHT FINLAY & ZAK, LLP  
23 7785 W. Sahara Ave., Suite 200  
24 Las Vegas, NV 89117  
25 Tel: (702) 475-7964

26 Mr. Sadri. is expected to have knowledge concerning the facts and circumstances of this  
27 case.

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1           2. Ray Koroghli  
2           c/o Yanxiong Li, Esq.  
3           WRIGHT FINLAY & ZAK, LLP  
4           7785 W. Sahara Ave., Suite 200  
5           Las Vegas, NV 89117  
6           Tel: (702) 475-7964

7           Mr. Koroghli is expected to have knowledge concerning the facts and circumstances of  
8 this case.

9           3. Jed Margolin  
10           c/o Adam McMillen, Esq..  
11           BROWNSTEIN HYATT FARBER SCHRECK, LLP  
12           5371 Kietzke Lane  
13           Reno, NV 89511  
14           Tel: (775) 324-4100

15           Mr. Margolin.is expected to have knowledge concerning the facts and circumstances of  
16 this case.

17           4. Patrick Canet, as Foreign Representative for Jazi Gholamreza Zandian  
18           c/o Jeffrey L. Hartman, Esq.  
19           HARTMAN & HARTMAN  
20           510 West Plumb Lane, Suite B  
21           Reno, NV 89509  
22           Tel: (775) 324-2800

23           Mr. Canet is expected to have knowledge concerning the facts and circumstances of this  
24 case.

25           5. Jazi Gholamreza Zandian  
26           6 Rue Edouard Fournier  
27           Paris, FR 75016  
28           Tel: Unknown

          Mr. Zandian is expected to have knowledge concerning the facts and circumstances of  
this case.

          Plaintiffs reserve the right to amend, supplement, or add to this list of individuals as  
discovery progresses. Plaintiffs reserve the right to call any witness listed in any other parties'  
disclosures of individuals. Plaintiffs further reserve the right to call upon any witness(es) for  
purposes of rebuttal/impeachment.

1           **DOCUMENTS WHICH ARE DISCOVERABLE UNDER Fed. R. Bankr. P. 7026 and**  
2 **Fed. R. Civ. P. 26(f).** Plaintiffs hereby identify and/or produce the following documents:

DATE	DESCRIPTION	BATES NO.
08/06/2003	Grant, Bargain and Sale Deed	WFZ0001 – WFZ0007
08/06/2003	Grant, Bargain and Sale Deed	WFZ0008 – WFZ0013
10/05/2005	Complaint in Case No. 05A511131	WFZ0014 – WFZ0046
11/03/2005	Lis Pendens in Case No. 05A511131	WFZ0047 – WFZ0056
06/08/2007	Judgment Confirming Arbitration Award in Case No. 05A511131	WFZ0057 – WFZ0173
07/14/2008	Stipulated judgment in Case NO. 05A511131                      174	WFZ0174 – WFZ0193
05/12/2009	Quitclaim Deed	WFZ0194 – WFZ0199
08/19/2013	Default Judgment in Case No. 09 OC 00579 1B	WFZ0200 – WFZ0204
04/09/2015	Sheriff's Certificate of Sale (Parcel 8)	WFZ0205 – WFZ0206
09/08/2016	Sheriff's Deed Upon Sale (Parcel 8)	WFZ0207 – WFZ0208
04/09/2015	Sheriff's Certificate of Sale (Parcel 4)	WFZ0209 – WFZ0210
09/08/2016	Sheriff's Deed Upon Sale (Parcel 4)	WFZ0211 – WFZ0212

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04/09/2015	Sheriff's Certificate of Sale (Parcel 2)	WFZ0213 – WFZ0214
09/08/2016	Sheriff's Deed Upon Sale (Parcel 2)	WFZ0215 – WFZ0216
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 079-150-09</b>	<b>WFZ0217 – WFZ0218</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 079-150-10</b>	<b>WFZ0219 – WFZ0220</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 079-150-13</b>	<b>WFZ0221 – WFZ0222</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 084-040-02</b>	<b>WFZ0223 – WFZ0224</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 084-040-04</b>	<b>WFZ0225 – WFZ0226</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 084-040-06</b>	<b>WFZ0227 – WFZ0228</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 084-040-10</b>	<b>WFZ0229 – WFZ0230</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 084-130-07</b>	<b>WFZ0231 – WFZ0232</b>
<b>12/26/2017</b>	<b>Washoe County Assessor's Historical Values for Parcel No. 084-140-17</b>	<b>WFZ0233 – WFZ0234</b>
<b>08/01/2007</b> – <b>08/19/2008</b>	<b>Pleadings from Supreme Court of Nevada Case No. 49924</b>	<b>WFZ0235 – WFZ2256</b>
<b>12/11/2009</b> – <b>06/03/2016</b>	<b>Pleadings from First Judicial District Court of Nevada – Carson City – Case No. 090C005791B</b>	<b>WFZ2257 – WFZ2439</b>

1	<b>06/16/2016</b>	<b>Jed Margolin’s Objection to Petition for Recognition and</b>	<b>WFZ2490 –</b>
2		<b>Chapter 15 Relief in U.S. Bankruptcy Court – District of</b>	<b>WFZ2553</b>
3		<b>Nevada – Case No. BK-N-16-50644-BTB</b>	
4	<b>09/25/2017</b>	<b>Order on Stipulation for Final Resolution of Litigation</b>	<b>WFZ2554 –</b>
5		<b>(Doc # 4747575) recorded with the Washoe County</b>	<b>WFZ2576</b>
6		<b>Recorder</b>	
7	<b>07/20/2009</b>	<b>Stipulation for Final Resolution of Litigation (Doc #2009-</b>	<b>WFZ2577 –</b>
8		<b>0720-0003600) recorded with the Clark County Recorder</b>	<b>WFZ2598</b>

9 Plaintiffs reserve the right to amend, supplement, or add to this list of documents any  
10 other relevant documents obtained through the discovery process or otherwise, without  
11 limitation. Plaintiffs reserve the right to use any document(s) listed in any other parties’  
12 disclosures of documents. Plaintiffs reserve the right to use any document(s) for purposes of  
13 rebuttal/impeachment.

14 **B. COMPUTATION OF DAMAGES**

15 Plaintiff’s damages are equal to attorney’s fees and costs incurred in this case. Plaintiffs  
16 reserve the right to supplement this disclosure based on discovery/further investigation in this  
17 action.

18 **C. INSURANCE AGREEMENTS**

19 Plaintiffs are unaware of any relevant insurance agreements at this time.

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Plaintiffs reserve the right to amend or to supplement these disclosures if it appears at any time that omissions or errors have been made or that additional or more accurate information becomes available to Plaintiffs.

DATED this 30th day of January, 2018.

WRIGHT, FINLAY & ZAK, LLP

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