

# Exhibit B

Exhibit B

**McMillen, Adam**

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**From:** reza <rezazand@hotmail.com>  
**Sent:** Tuesday, April 19, 2016 12:52 PM  
**To:** McMillen, Adam  
**Subject:** Re: Confidential

Mr. McMillen,

I think your client does not get it, there is no money, I kept repeating this in my previous emails, so deposition and examination are worthless and waste of time and money.

It does not matter what is the amount of judgment, what is important is if there is payment capacity.

If your client is prepared to pay my travel and accommodation costs and a reasonable witness fee and you vacate the bench warrant, I will be more than happy to come to USA.

I made a very sincere offer and waiting your decision to accept or reject it, please let me know before end of this week.

Please let me know since I may not be able to execute it for reasons beyond my control if it takes more time or your client is undecided.

Sincerely

Reza

Sent from my iPhone

On Apr 19, 2016, at 19:04, McMillen, Adam <[AMcMillen@BHFS.com](mailto:AMcMillen@BHFS.com)> wrote:

Mr. Zandian,

We are still very interested in taking your deposition/debtor's examination. Is there a time you will be in the United States in the near future?

Sincerely,

**Adam P. McMillen**  
**Brownstein Hyatt Farber Schreck, LLP**  
5371 Kietzke Lane  
Reno, Nevada 89511

100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106

775.324.4100 tel  
[amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)

**From:** reza [<mailto:rezazand@hotmail.com>]  
**Sent:** Thursday, April 14, 2016 11:38 PM  
**To:** McMillen, Adam  
**Subject:** Re: Confidential

Mr. McMillen,

My offer is to settle the entire case and I do not care if you share information or proceeds with Mr. Margolin.

I barely can pay my daily expenses and my offer is serious and my intention was to stop the fees and costs that your different firm paid during last seven years.

Again, thank you for your understanding and cooperation to end this case.

Sincerely  
Reza

Sent from my iPhone

On Apr 14, 2016, at 21:41, McMillen, Adam <[AMcMillen@BHFS.com](mailto:AMcMillen@BHFS.com)> wrote:

Mr. Zandian,

You have misunderstood my reason for responding to your emails. I represent the interests of Jed Margolin. I will not accept an offer from you to settle this matter outside of Mr. Margolin's interests. I am obligated to disclose everything to Mr. Margolin and will do so and will not be entering into any type of separate settlement for me or the law firm I work for. If you want to settle this matter, please provide a serious offer to settle my client's case. Also, if you wish to inform the Court and us of a new address for legal service, please do so in writing.

Sincerely,

**Adam P. McMillen**  
**Brownstein Hyatt Farber Schreck, LLP**  
5371 Kietzke Lane  
Reno, Nevada 89511

100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106

775.324.4100 tel  
[amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)

**From:** reza [<mailto:rezazand@hotmail.com>]  
**Sent:** Wednesday, April 13, 2016 11:29 AM  
**To:** McMillen, Adam  
**Subject:** Re: Confidential

Mr. McMillen,

Thank you for your response, I will not talk to anybody or forward any information regarding this confidential correspondences and I expect thou to do the same including Mr. Margolin as if you were talking to my attorney privately. The fact is that no harm was inflicted and he has been manipulated by Robert Adams and Sadri.

The fact also is that contrary to their false understanding I have no money and currently under bankruptcy, I owe huge amount to IRS and FTB that I can not pay.

I was not even able to pay my attorney for two years and he finally withdraw as you are aware.

You tell me what is an acceptable and reasonable offer, let's work to finish this to avoid further cost and waste of time.

I do not wish to pay a dime to Margolin but I am prepared to pay you up to \$30,000 cash or \$50,000 within 18 months and appreciate to understand my position and disastrous situation.

Sincerely  
Reza

Sent from my iPhone

On Apr 13, 2016, at 22:06, McMillen, Adam <[AMcMillen@BHFS.com](mailto:AMcMillen@BHFS.com)> wrote:

Mr. Zandian,

Please provide a serious offer to settle this matter. Once we settle this matter we can get the court action dismissed and potentially get the warrant for your arrest dismissed as well. If we settle this matter we will also stop pursuing your son, Alborz, for his deposition. We are currently having him served with a deposition subpoena. Again, please provide a serious offer to settle this matter.

Sincerely,

Adam P. McMillen  
Brownstein Hyatt Farber Schreck, LLP  
5371 Kietzke Lane  
Reno, Nevada 89511

100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106

775.324.4100 tel  
[amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)

-----Original Message-----

From: reza [<mailto:rezazand@hotmail.com>]  
Sent: Tuesday, April 12, 2016 9:43 AM  
To: McMillen, Adam

Subject: Confidential

Dear Mr. McMillen,

Hope all well, I am writing the email to you to let you know that I am prepared to pay a reasonable portion of your fees and cost since I believe that you have been unfairly exploited for 8 years based on a judgment obtained by fraudulent service and address.

I am currently living in Iran and wish to keep this conversation absolutely confidential and as you confirmed earlier I have no attorney to represent me and I hope you understand my position for confidentiality .

The vacant land in Nevada that I got as sweat equity has no value and I am planning to pay you out of other resources.

My number is +98 912 1222 859.

Regards

Reza

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