

1 Richard F. Holley, Esq. (NV Bar No. 3077)
 Email: rholley@nevadafirm.com
 2 Andrea M. Gandara, Esq. (NV Bar No. 12580)
 Email: agandara@nevadafirm.com
 3 Mary Langsner, Ph.D. (NV Bar No. 13707)
 Email: mlangsner@nevadafirm.com
 4 HOLLEY DRIGGS WALCH
 FINE PUZEY STEIN & THOMPSON
 5 400 South Fourth Street, Third Floor
 Las Vegas, Nevada 89101
 6 Telephone: 702/791-0308
 Facsimile: 702/791-1912
 7

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

12 **UNITED STATES BANKRUPTCY COURT**

13 **DISTRICT OF NEVADA**

14 In re
 15 GHOLAM REZA JAZI ZANDIAN,
 16
 17 Debtor in Foreign Proceeding.

Case No. BK-N-16-50644-BTB
 Chapter 15

Old Date of Hearing: January 17, 2020
 Old Time of Hearing: 2:00 PM

New Date: January 24, 2020
 New Time: 1:30 PM

Judge: Hon. Bruce T. Beesley

18 **STIPULATION TO CONTINUE HEARING ON MOTION TO DISMISS CASE**

19 Claimants Fred Sadri, both in his individual capacity and as Trustee for The Star Living
 20 Trust, dated April 14, 1997; Ray Koroghli, individually; and Ray Koroghli and Sathsowi T.
 21 Koroghli, in their individual capacities as well as Managing Trustees for Koroghli Management
 22 Trust, by and through counsel of record Richard F. Holley, Esq. Andrea M. Gandara, Esq. and
 23 Mary Langsner, Ph.D. of the law firm Holley Driggs Walch Fine Puzey Stein & Thompson
 24 (“Claimants”); Jed Margolin, by and through his counsel of record Arthur A. Zorio, Esq. and
 25 Matthew D. Francis, Esq., of the law firm Brownstein Hyatt Farber Schreck, LLP (“Margolin”)
 26 (Claimants and Margolin together, the “Parties”), hereby stipulate and agree as follows:

27 ...

28 ...

HOLLEY DRIGGS
 WALCH | FINE | PUZEY | STEIN | THOMPSON

RECITALS

1
2 1. On May 19, 2019, Patrick Canet, Judicial Liquidator and Foreign Representative
3 (“Canet”), filed Chapter 15 Petition for Recognition of Foreign Proceeding [ECF No. 1]¹, which
4 commenced this bankruptcy Case.

5 2. On July 30, 2019, Margolin filed an Amended Motion to Dismiss the Case
6 (“Motion”) [ECF No. 38]; hearing was set on October 1, 2019.

7 3. On September 17, 2019, Claimants filed a Limited Opposition to Amended
8 Motion to Dismiss Chapter 15 Case [ECF No. 42].

9 4. On September 19, 2019, Canet filed an Opposition to Motion to Dismiss
10 [ECF No. 48].

11 5. On October 1, 2019, the Court conducted its hearing on the Motion, at which the
12 Parties appeared.

13 6. On November 5, 2109 the Court entered an order that all proceedings in the main
14 proceeding (Case No. 16-50644) and all Adversary proceedings including Case No. 17-05016,
15 and the Complaint for Order Authorizing Sale of Real Property (ECF No. 57 filed in 16-50466)
16 are hereby stayed pending resolution of the Motion to Dismiss Chapter 15 Case; and continued
17 the hearing on the Motion to December 5, 2019 [ECF No. 62].

18 7. On December 5, 2019, Margolin filed a Supplement to Amended Motion to
19 Dismiss Chapter 15 Case [ECF No. 71].

20 8. On December 19, 2019, Claimants filed a Response to Supplement to Amended
21 Motion to Dismiss Chapter 15 Case [ECF No. 72].

22 9. On December 26, 2019, Margolin filed a Reply to Response to Supplement to
23 Amended Motion to Dismiss Chapter 15 Case [ECF No. 73].

24 10. On January 2, 2020, the Court conducted its continued hearing on the Motion, at
25 which the Parties and counsel for Canet appeared. During the hearing, none of the Parties or
26 Canet opposed the dismissal of the Chapter 15 case, but the Parties requested that the hearing be

27 ¹ All references to “ECF No.” are to the numbers assigned to the documents filed in the
28 bankruptcy case identified in the caption above (“Case”) as they appear on the docket maintained
by the Clerk of the Court of the United States Bankruptcy Court for the District of Nevada.

1 continued until January 10, 2020 so that they could discuss a mutually-agreeable resolution
2 between them. As such, the Court continued the matter to January 10, 2020, at 10:00 a.m.
3 [ECF No. 74].

4 11. On January 10, 2020, the Parties stipulated and the Court entered an order
5 approving the stipulation to continue the January 10, 2020 hearing to **January 17, 2020 at 2:00**
6 **p.m.** [ECF No. 76].

7 12. The Parties represent that they are still working towards a mutually agreeable
8 resolution between them and request a short continuance in hopes of reaching an agreement.

9 **NOW, THEREFORE**, based upon the above Recitals, the Parties, by and through their
10 counsel of record, hereby agree and stipulate as follows:

11 **STIPULATION**

12 **IT IS HEREBY STIPULATED AND AGREED** that the Motion [ECF No. 38] is
13 continued to **January 24, 2020, at 1:30 p.m.**, taking place in Courtroom No. 4, of the C. Clifton
14 Young Federal Building & U.S. Courthouse, 300 Booth St, Reno, NV 89509, and may be
15 continued thereafter.

16 ...
17 ...
18 ...
19 ...
20 ...
21 ...
22 ...
23 ...
24 ...
25 ...
26 ...
27 ...
28 ...

HOLLEY DRIGGS
WALCH | FINE | PUZEY | STEIN | THOMPSON

1 A proposed Stipulation to Continue Hearing on Motion to Dismiss Case has been lodged
2 contemporaneously herewith.

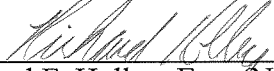
3 **IT IS SO STIPULATED.**

4 Dated this 17th day of January 2020.

Dated this 17th day of January 2020.

5 HOLLEY DRIGGS WALCH
6 FINE PUZEY STEIN & THOMPSON

BROWNSTEIN HYATT FARBER
SCHRECK, LLP



/s/ Matthew D. Francis

7 Richard F. Holley, Esq. (NV Bar 3077)
8 Andrea M. Gandara, Esq. (NV Bar 12580)
9 Mary Langsner, Ph.D. (NV Bar 13707)
10 400 South Fourth Street, Third Floor
11 Las Vegas, Nevada 89101
12 *Attorneys for Fred Sadri, both in his*
13 *individual capacity and as Trustee for The*
14 *Star Living Trust, dated April 14, 1997; Ray*
15 *Koroghli, individually; and Ray Koroghli*
16 *and Sathsowi T. Koroghli, in their*
17 *individual capacities as well as Managing*
18 *Trustees for Koroghli Management Trust*

Matthew D. Francis (Nevada Bar 6978)
Arthur A. Zorio (Nevada Bar 6547)
5371 Kietzke Lane
Reno, NV 89511
Attorneys for Jed Margolin

HOLLEY DRIGGS
WALCH | FINE | PUZEY | STEIN | THOMPSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holley Driggs Walch Fine Puzey Stein & Thompson, and that on the 17th day of January 2020, I caused to be served a true and correct copy of STIPULATION TO CONTINUE HEARING ON MOTION TO DISMISS CASE in the following manner:

(ELECTRONIC SERVICE) Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed below, at their last known mailing addresses, on the date above written.

(OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

(FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

An employee of Holley Driggs Walch
Fine Puzey Stein & Thompson

HOLLEY DRIGGS
WALCH | FINE | PUZEY | STEIN | THOMPSON

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28