

HOLLEY DRIGGS

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7 *Attorneys for 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.
 8 *Koroghli, in their individual capacities as well as Managing Trustees for Koroghli Management*
 9 *Trust*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

12 In re
 13 GHOLAM REZA JAZI ZANDIAN,
 14 Debtor in Foreign Proceeding.
 15 FRED SADRI, AS TRUSTEE FOR THE STAR
 LIVING TRUST, DATED APRIL 14, 1997;
 16 RAY KOROGHLI AND SATHSOWI T.
 KOROGHLI, AS MANAGING TRUSTEES
 17 FOR KOROGHLI MANAGEMENT TRUST,
 18 Plaintiffs,
 19 v.
 20 JED MARGOLIN; JAZI GHOLALREZA
 ZANDIAN; and all other parties claiming
 21 an interest in the real properties described
 in this action,
 22 Defendants.
 23 PATRICK CANET,
 24 Counterclaimant,
 25 v.
 26 FRED SADRI, INDIVIDUALLY AND AS
 TRUSTEE FOR THE STAR LIVING TRUST;
 27 RAY KOROGHLI, INDIVIDUALLY, RAY
 28 KOROGHLI AND SATHSOWI T. KOROGHLI.

Case No. BK-N-16-50644-BTB
 Chapter 15
 Adv. No. 17-05016-BTB
 Old Date of Hearing: July 1, 2020
 Old Time of Hearing: 10:00 AM
 New Date: July 21, 2020
 New Time: 11:00 AM
 Judge: Hon. Bruce T. Beesley

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1 AS MANAGING TRUSTEES FOR
2 KOROGHLI MANAGEMENT TRUST,

3 Counter-defendants.

4 PATRICK CANET,

5 Cross-Claimant,

6 v.

7 JED MARGOLIN,

8 Cross-Defendant.

9 **STIPULATION TO CONTINUE HEARING ON STATUS OF THE CASE**

10 Plaintiffs/Counter-defendants Fred Sadri, both in his individual capacity and as Trustee
11 for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and Ray Koroghli
12 and Sathsowi T. Koroghli, in their individual capacities as well as Managing Trustees for
13 Koroghli Management Trust, by and through counsel of record Richard F. Holley, Esq. Andrea
14 M. Gandara, Esq. and Mary Langsner, Ph.D. of the law firm Holley Driggs (“Plaintiffs/Counter-
15 defendants”); Jed Margolin, by and through his counsel of record Arthur A. Zorio, Esq. and
16 Matthew D. Francis, Esq., of the law firm Brownstein Hyatt Farber Schreck, LLP (“Margolin”)
17 (Plaintiffs/Counter-defendants and Margolin together, the “Parties”), hereby stipulate and agree
18 as follows:

19 **RECITALS**

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

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

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27 ¹ All references to “ECF No.” are to the numbers assigned to the documents filed in the
28 bankruptcy cases 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.

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

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

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

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

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

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

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

18 10. On January 2, 2020, the Court conducted hearing on matters before it, at which
19 the Parties and counsel for Canet appeared. During the hearing, none of the Parties or Canet
20 opposed the dismissal of the Chapter 15 case, but the Parties requested that the hearing be
21 continued until January 10, 2020 so that they could discuss a mutually-agreeable resolution
22 between them. As such, the Court continued the matter to January 10, 2020, at 10:00 a.m. [Adv.
23 ECF No. 80].

24 11. On January 10, 2020, the Parties stipulated and the Court entered an order
25 approving the stipulation to continue the January 10, 2020 hearing to January 17, 2020 at
26 2:00 p.m. [Adv. ECF No. 84]. The parties later agreed to continue the hearing to January 24,
27 2020 at 1:30 p.m.
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1 12. On January 24, 2020, the Court conducted its continued hearing on the Motion, at
2 which the Parties appeared. The Court continued the matter to February 18, 2020, at 10:30 a.m.

3 13. On February 18, 2020, the Court conducted its continued hearing on the Motion,
4 at which the Parties appeared. The Court continued the matter to April 9, 2020, at 10:00 a.m.

5 14. On April 9, 2020, the Court conducted its continued hearing on the Motion, at
6 which the Parties appeared. The Court continued the matter to June 10, 2020, at 2:00 p.m.

7 15. On June 12, 2020, the Court conducted its continued hearing on the Motion, at
8 which the Parties appeared. The Court continued the matter to July 1, 2020, 10:00 a.m.

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

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

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STIPULATION

IT IS HEREBY STIPULATED AND AGREED that the hearing on status of the above-captioned case is continued to **July 21, 2020, at 11:00 a.m.**, taking place in Courtroom No. 4, of the C. Clifton Young Federal Building & U.S. Courthouse, 300 Booth St, Reno, NV 89509, or by telephonic participation, and may be continued thereafter.

A proposed Stipulation to Continue Hearing on Status of the Case has been lodged contemporaneously herewith.

IT IS SO STIPULATED.

Dated this 30th day of June 2020.

Dated this 30th day of June 2020.

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BROWNSTEIN HYATT FARBER
SCHRECK, LLP

/s/ Richard F. Holley
Richard F. Holley, Esq. (NV Bar 3077)
Andrea M. Gandara, Esq. (NV Bar 12580)
Mary Langsner, Ph.D. (NV Bar 13707)
400 South Fourth Street, Third Floor
Las Vegas, Nevada 89101
Attorneys for 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

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

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Holley Driggs, and that on the 30th day of June 2020, I caused to be served a true and correct copy of STIPULATION TO CONTINUE HEARING ON STATUS OF THE 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

HOLLEY DRIGGS
WALCH | FINE | PUZEY | STEIN | THOMPSON