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Nevada Bar No. 6870  
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6 **Attorneys for Defendant,**  
7 **REZA ZANDIAN**

8 IN THE FIRST JUDICIAL DISTRICT COURT  
9 OF THE STATE OF NEVADA IN AND FOR  
CARSON CITY

10 JED MARGOLIN, an individual,

11 Plaintiff,

Case No. 09 OC 00579 1B

12 vs.

Dept. No. I

13 OPTIMA TECHNOLOGY CORPORATION,  
a California corporation, OPTIMA  
14 TECHNOLOGY CORPORATION, a Nevada  
corporation, REZA ZANDIAN aka  
15 GOLAMREZA ZANDIANJAZI aka  
GHOLAM REZA ZANDIAN aka REZA  
16 JAZI aka J. REZA JAZI aka G. REZA JAZI  
aka GHONOREZA ZANDIAN JAZI, an  
17 individual, DOE Companies 1-10, DOE  
Corporations 11-20, and DOE Individuals  
18 21-30,

19 Defendants.

20 **OPPOSITION TO MOTION FOR ORDER**  
**TO SHOW CAUSE REGARDING CONTEMPT**

21 COMES NOW Defendant, REZA ZANDIAN, by and through his undersigned  
22 counsel of record, Kaempfer Crowell, and hereby opposes the *Motion for Order to Show*  
23 *Cause Regarding Contempt* ("Motion") filed by Plaintiff in this matter on February 12,  
24 2014. This Opposition is made pursuant to FJDCR 15 and is based on NRS 21.270,

1 NRCP 69, the attached Memorandum of Points and Authorities, all papers and  
2 pleadings on file herein, and any evidence and argument allowed by the Court at a  
3 hearing on the *Motion* granted pursuant to FJDCR 15 or D.C.R. 15.

4 DATED this 3<sup>rd</sup> day of March, 2014.

5 KAEMPFER CROWELL

6  
7 BY:

  
8 JASON D. WOODBURY

Nevada Bar No. 6870

9 SEVERIN A. CARLSON

Nevada Bar No. 9373

10 KAEMPFER CROWELL

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11 Carson City, Nevada 89703

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[scarlson@kcnvlaw.com](mailto:scarlson@kcnvlaw.com)

13 Attorneys for **Defendant, REZA ZANDIAN**

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. Factual Background

3 The following facts are pertinent to this Court’s analysis in regard to Plaintiff’s  
4 request for the issuance of an order to show cause why Reza Zandian should not be held  
5 in contempt of this Court:<sup>1</sup>

6 (1) Reza Zandian does not reside in Carson City, Nevada<sup>2</sup>;

7 (2) On January 13, 2014, this Court issued its *Order Granting Plaintiff’s*  
8 *Motion for Debtor Examination and to Produce Documents* (“*Order for*  
9 *Debtor Examination*”)<sup>3</sup>;

10 (3) On January 16, 2014, counsel for Plaintiff served by regular mail a notice  
11 of the entry of the *Order for Debtor Examination* upon counsel for Reza  
12 Zandian<sup>4</sup>;

13  
14 <sup>1</sup> Although only a select few facts are relevant to the actual issue before the Court, Plaintiff’s *Motion* offers  
15 several pages of “background”, most of which is obviously designed to engender bad will and disdain for  
16 Mr. Zandian. *Motion* at 3:20 – 7:15. This *Opposition* will make no effort—because none is called for—to  
17 refute material which is immaterial to the question of whether this Court should issue the requested  
18 order. Suffice it to say, for now, that there are two sides to this story.

19 <sup>2</sup> This is not to assert that there is no dispute over the residence of Mr. Zandian. Mr. Zandian continues to  
20 maintain that he resides in France, while Plaintiff continues to contend that he resides in California.  
21 *Compare, e.g., Affidavit of Reza Zandian in Support of Mot. to Set Aside Default J.* at ¶¶2-3 (“I am  
22 currently a resident of Paris, France and have been living full-time at 6 Rue Edouard Fournier, 75116  
23 Paris, France since August 11, 2011.... I have not resided in the United States since August 2011.”) (Jan.  
24 17, 2014) (attached hereto and marked as Exhibit 1); *Notice of Appeal* at 1:1-3, 22-25 (identifying Reza  
Zandain’s address at 6, rue Edouard Fournier, 75116 Paris, France) (Clark County District Court case  
number A-11-635430-C, Dept. No. IV) (Mar. 15, 2013) (attached hereto and marked as Exhibit 2) *with,*  
*e.g., Application for Default J.* at 13:5-7, 13-15 (April 16, 2013) (serving Mr. Zandian at one address in Fair  
Oaks, California and one address in San Diego, California); *Declaration of Jed Margolin in Support of*  
*Appl. For Default J.* at 5:6-8 (April 16, 2013) (serving Reza Zandian at address in San Diego, California);  
*Plaintiff’s App. for Atty’s Fees and Costs* at 6:6-10 (serving Reza Zandian at two substantially similar  
addresses in San Diego, California) (Feb. 15, 2013); *Complaint* at ¶4 (“On information and belief,  
Defendant Reza Zandian ... is an individual who at all relevant times resided in San Diego, California or  
Las Vegas, Nevada.”) (Dec. 11, 2009). This is by no means an exhaustive recitation of the evidence which  
has been offered on the point of Mr. Zandian’s residence. In regard to the *Motion*, it does not matter  
where Mr. Zandian resides, so long as it is not in Carson City, Nevada. And there has never been any  
suggestion or indication by anyone in this case that he does.

<sup>3</sup> See *Order Granting Pl.’s Mot. for Debtor Examination and to Produce Documents* (Jan. 13, 2014).

<sup>4</sup> See *Notice of Entry of Or. Granting Pl.’s Mot. for Debtor Examination and to Produce Documents* (Jan.  
16, 2014) (attached hereto and marked as Exhibit 3).

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(4) The *Order for Debtor Examination* required Reza Zandian to appear on February 11, 2014 at 9:00 a.m. before the Court in Carson City, Nevada<sup>5</sup>; and

(5) The *Order for Debtor Examination* required Reza Zandian to produce 11 categories of documents to the office of Plaintiff's counsel no later than February 4, 2014. Those categories of documents included, but were not limited to:

(a) Any and all information and documentation identifying real property, computers, cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and all other assets that may be available for execution to satisfy the Judgment entered by the Court....

(b) Documents sufficient to show Zandian's balance sheet for each month for the years 2007 to present;

(c) Documents sufficient to show Zandian's gross revenues for each month for the years 2007 to present;

(d) Documents sufficient to show Zandian's costs and expenses for each month for the years 2007 to present;

(e) All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2007 to the present;

(f) All of Zandian's statements, cancelled checks and related banking documents for any bank, brokerage or other financial account at least partially controlled by Zandian, or recorded in the name of Zandian or for Zandian's benefit, for the years 2007 to the present;

KAEMPFER CROWELL RENSHAW  
GRONAUER & FIORENTINO  
510 W. Fourth Street  
Carson City, Nevada 89703

<sup>5</sup> See *Order for Debtor Examination* at ¶1.

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(g) All of Zandian’s checkbooks, checkbook stubs and checkbook entries for the years 2007 to the present;

(h) Documents sufficient to show the means and source of payment of Zandian’s current residence and any other residence for the years 2007 to present; and

(i) Documents sufficient to show the means and source of payment of Zandian’s counsel in this matter.<sup>6</sup>

As of the date of the *Order for Debtor Examination*, there had been a total of 85 months in the period referenced as “each month for the years 2007 to present.”

**II. Argument**

**A. Reza Zandian is not a resident of Carson City and therefore NRS 21.270 does not authorize his examination in Carson City.**

Plaintiff’s request for permission to conduct a debtor’s examination in this case was based upon NRS 21.270, which authorizes and regulates the procedure.<sup>7</sup> As such, it seems somewhat remarkable that Plaintiff’s *Motion for Judgment Debtor Examination and to Produce Documents* quotes only a portion of the statute.<sup>8</sup> Unfortunately, that that *Motion* included nothing to alert this Court that only a portion of the controlling statute was included, and that, in fact, the most relevant portion was excluded.

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<sup>6</sup> See *Order for Debtor Examination* at ¶2(a) – (k).

<sup>7</sup> See *Motion for Judgment Debtor Examination and to Produce Documents* at 1:24-25 (Dec. 11, 2013).

<sup>8</sup> See *Motion for Judgment Debtor Examination and to Produce Documents* at 5:25 – 6:2 (1:24-25 (“Under Nevada procedure, Mr. Margolin is entitled to a debtor examination. NRS 21.270 states that ‘a judgment creditor, at any time after the judgment is entered, is entitled to an order from the judge of the court requiring the judgment debtor to appear and answer upon oath or affirmation concerning his or her

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*In its entirety*, NRS 21.270(1) provides:

1. A judgment creditor, at any time after the judgment is entered, is entitled to an order from the judge of the court requiring the judgment debtor to appear and to answer upon oath or affirmation concerning his or her property, before:
  - (a) The judge or a master appointed by the judge; or
  - (b) An attorney representing the judgment creditor,
 at a time and place specified in the order. ***No judgment debtor may be required to appear outside the county in which the judgment debtor resides.***

(Emphasis added).

The emphasized provision could not be more clear and explicit. Under *anyone's* interpretation of the evidence pertaining to the residence of Reza Zandian, there is no information indicating that he resides in Carson City, Nevada—or that he ever has, for that matter. Therefore, NRS 21.270 does not permit him to be the subject of a debtor's examination here. The *Order for Debtor's Examination* should have never been issued. Indeed, it is virtually certain that, had the applicable law been quoted or explained in its entirety, this Court never would have issued such an order.<sup>9</sup>

As the *Order for Debtor's Examination* is contrary to NRS 21.270 in the first place, Mr. Zandian should not be held in contempt for a failure to comply with the requirements of that order, insofar as it required to personally present himself in Carson City, Nevada for examination. For this reason, this Court should deny the *Motion*.

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property' at an examination either before 1) the judge or master appointed by the judge or 2) an attorney representing the judgment creditor. NRS 21.270(1)".

<sup>9</sup> To be fair, the fact that the *Motion for Judgment Debtor Examination and to Produce Documents* was unopposed by then-counsel for Reza Zandian bears a fair share of the responsibility for the oversight. The invalidity of the order subjecting Mr. Zandian to a debtor's examination should have been presented to this Court in the context of an opposition. Nonetheless, the failure to respond does not expand the scope of this Court's lawful authority beyond that which is authorized. In other words, the law is what the law is.

1           **B. Reza Zandian should not be held in contempt for failing to**  
2           **comply with a requirement reducing by half his time to respond**  
3           **to an ordered document production.**

4           Next, Plaintiff complains that Mr. Zandian failed to comply with this Court's  
5           *Order for Debtor's Examination* "by failing to produce the documents one week prior to  
6           the debtor's examination."<sup>10</sup> Once again, Plaintiff takes generous—and unauthorized—  
7           liberties with the procedural regulation of supplementary proceedings in aid of  
8           judgment execution.

9           NRCP 69(a) provides:

10           (a) *In general.* Process to enforce a judgment for the payment of money shall  
11           be a writ of execution, unless the court directs otherwise. The procedure on  
12           execution, in proceedings supplementary to and in aid of a judgment, and in  
13           proceedings on and in aid of execution shall be in accordance with the practice  
14           and procedure of the State. ***In aid of the judgment or execution, the***  
15           ***judgment creditor*** or a successor in interest when that interest appears of  
16           record, ***may obtain discovery from any person, including the***  
17           ***judgment debtor, in the manner provided in these rules.***

18           (Emphasis added).

19           The emphasized language permits Plaintiff, as the judgment creditor, to utilize  
20           the discovery techniques set forth in the Nevada Rules of Civil Procedure. As such, the  
21           *Order for Debtor's Examination*, insofar as it required the production of documents by  
22           Reza Zandian, is sound. However, the term "in the manner provided in these rules" is  
23           more than an authorization. It is also a limitation. That is, the language authorizes the  
24           use of discovery techniques, but requires them to be exercised in accordance with the  
25           Nevada Rules of Civil Procedure.

26           The production of documents is governed by NRCP 34. Under that rule, a party,  
27           in this case Reza Zandian, would be allowed 30 days to serve a written response to a

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28           And the failure to present an accurate statement of the law in a timely fashion, while regrettable in this  
29           instance, does not change the lawful authority—and limitations thereon—of this Court.

30           <sup>10</sup> See *Motion* at 8:20-21.

1 request for the production of documents.<sup>11</sup> Applied in the context of this case, 30 days  
2 from service of the *Order for Debtor's Examination* would have required the document  
3 disclosure by February 18, 2014.<sup>12</sup> Of course, Reza Zandian's time for production was  
4 drastically reduced from that to February 4, 2014. The result was a requirement that  
5 Reza Zandian produce 11 categories of documents, several of which required 85 months  
6 of information, within two weeks—half of the time allotted for a “normal” document  
7 production.<sup>13</sup>

8 Of course, this Court has the authority to compel a shorter or allow a longer time  
9 than 30 days to produce documents in accordance with NRCP 34.<sup>14</sup> And while Plaintiff  
10 may contend that this authority was invoked by the Court in its *Order for Debtor's*  
11 *Examination*, the contention seems dubious for two reasons. First, Plaintiff's *Motion*  
12 *for Judgment Debtor Examination and to Produce Documents* includes no discussion  
13 supporting a request to shorten the time for production. And, second, there is, in fact,  
14 no urgency to limit the time frame for the production of the requested documents. The  
15 judgment in this case has existed for quite some time prior to the request for  
16 supplementary proceedings. In regard to that judgment, the interests of Plaintiff are  
17 protected from fraudulent transfers by Chapter 112 of Nevada Revised Statutes. Other  
18 than Plaintiff's yearn to expedite execution—shared by nearly all judgment creditors  
19 throughout history—there is no meaningful reason to reduce by half the opportunity for  
20

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21 <sup>11</sup> See NRCP 34(b) (“The party upon whom the request is served shall serve a written response within 30  
22 days after the service of the request.”)

23 <sup>12</sup> See NRCP 6.

24 <sup>13</sup> Again, it must be conceded that it would have been far better to present this position in the context of an  
opposition to the *Motion for Judgment Debtor Examination and to Produce Documents*. But be that as it  
may, counsel for Reza Zandian did alert Plaintiff's counsel in advance that it would not be possible to  
comply with the order's production requirement “due to the short amount of time provided.” Exhibit 2 to  
*Motion*.

<sup>14</sup> NRCP 34(b) (“A shorter or longer time may be directed by the court....”)



1 Reza Zandian to respond to the expansive request set forth in the Order for Debtor's  
2 Examination.

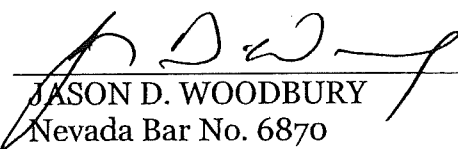
3 These circumstances do not warrant a determination that Reza Zandian is in  
4 contempt of this Court or that the sanctions which Plaintiff requests should be imposed.  
5 For this reason, this Court should deny the Motion at this time.

6 **III. Conclusion**

7 For these reasons, it is respectfully requested that this Court enter an order  
8 denying the Motion.

9 DATED this 3<sup>rd</sup> day of March, 2014.

10 KAEMPFER CROWELL

11  
12 BY:   
13 JASON D. WOODBURY  
14 Nevada Bar No. 6870  
15 SEVERIN A. CARLSON  
16 Nevada Bar No. 9373  
17 KAEMPFER CROWELL  
18 510 West Fourth Street  
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23 [scarlson@kcnvlaw.com](mailto:scarlson@kcnvlaw.com)  
24 Attorneys for **Defendant, REZA ZANDIAN**

KAEMPFER CROWELL RENSCHAW  
GRONAUER & FIORENTINO  
510 W. Fourth Street  
Carson City, Nevada 89703

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that service of the foregoing  
3 **OPPOSITION TO MOTION FOR ORDER TO SHOW CAUSE REGARDING**  
4 **CONTEMPT** was made this date by depositing a true and correct copy of the document  
5 in the United States mail, postage pre-paid at Carson City, Nevada, addressed to:

6 Matthew D. Francis  
7 Adam P. McMillen  
8 WATSON ROUNDS  
9 5371 Kietzke Lane  
10 Reno, NV 89511  
11 *Attorneys for Plaintiff Jed Margolin*

12 DATED this 3<sup>rd</sup> day of March, 2014.

13   
14 \_\_\_\_\_

15 An employee of Kaempfer Crowell  
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**JED MARGOLIN, an individual,**

**Plaintiff,**

**vs.**

**OPTIMA TECHNOLOGY CORPORATION, a California corporation,  
OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA  
ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN  
aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONOREZA  
ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-  
20, and DOE Individuals 21-30,**

**Defendants.**

**In the First Judicial District Court  
of the State of Nevada in and for Carson City**

**Case No. 09 OC 00579 1B  
Dept. No. I**

**EXHIBIT INDEX  
to  
Opposition Motion for Order to Show Cause Regarding Contempt**

<b>Exhibit No.</b>	<b>Description of Exhibit</b>	<b>Exhibit Pages</b>
1	<i>Affidavit of Reza Zandian in Support of Motion to Set Aside Default Judgment . (Jan. 17, 2014)</i>	2
2	<i>Notice of Appeal (Mar. 15, 2013)</i>	2
3	<i>Notice of Entry of Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents (Jan. 16, 2014)</i>	8

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# **EXHIBIT 1**

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# **EXHIBIT 1**

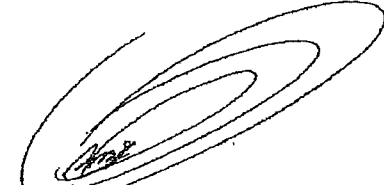
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I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 17 day of January, 2014.

  
REZA ZANDIAN

Subscribed and Sworn to before me this 17 day of January, 2014.

CAROLINE AL TAWIL  
Conseillère de Clientèle  
~~Agence Paris Passy~~

Notary Public in and for Said State and County

(SEAL)

HAWKINS MELENDREZ, P.C.  
9555 Hillwood Drive, Suite 150  
Las Vegas, Nevada 89134  
Telephone: (702) 318-8800 • Facsimile: (702) 318-8801

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# **EXHIBIT 2**

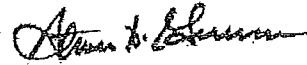
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# **EXHIBIT 2**

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CLERK OF THE COURT

1 NOAS  
2 REZA ZANDIAN  
3 6, rue Edouard Fournier  
4 75116 Paris, France  
5 Pro Per Appellant

6 DISTRICT COURT  
7 CLARK COUNTY, NEVADA

8 GHOLAMREZA ZANDIAN JAZI, also  
9 known as REZA ZANDIAN, individually,

CASE NO.: A-11-635430-C  
DEPT. NO.: IV

10 Plaintiff,

11 v.

12 FIRST AMERICAN TITLE COMPANY, a  
13 Nevada business entity; JOHNSON SPRING  
14 WATER COMPANY, LLC, formerly known  
15 as BIG SPRING RANCH, LLC, a Nevada  
16 Limited Liability Company, FRED SADRI,  
17 Trustee of the Star Living Trust, RAY  
18 KOROGHLI, individually, and ELIAS  
19 ABRISHAMI, individually,

20 Defendants.

21 AND ALL RELATED COUNTERCLAIMS  
22 AND THIRD-PARTY CLAIMS

23 1334.024072-1d

24 NOTICE OF APPEAL

25 Notice is hereby given that REZA ZANDIAN a member of the above named company,  
26 hereby appeals to the Supreme Court of Nevada from the Order to Distribute Attorney Fee and Costs  
27 Awards to Defendants entered in this action on the 15<sup>th</sup> day of February, 2013.

28 DATED this 15<sup>th</sup> day of March, 2013.

BY:   
REZA ZANDIAN  
6, rue Edouard Fournier  
75116 Paris, France  
Pro Per Appellant



CERTIFICATE OF MAILING

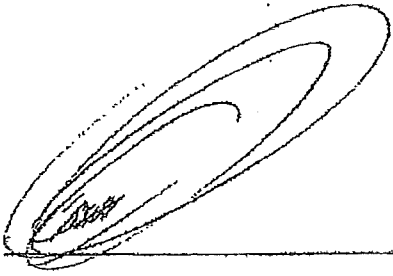
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I HEREBY CERTIFY that on the \_\_\_ day of March, 2013, I served a copy of the above and foregoing NOTICE OF APPEAL, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully prepaid addressed to:

Stanley W. Parry  
100 North City Parkway, Ste. 1750  
Las Vegas, Nevada 89106

Elias Abrishami  
P.O. Box 10476  
Beverly Hills, California 90213

Ryan E. Johnson, Esq.  
Watson & Rounds  
777 North Rainbow Blvd. Ste. 350  
Las Vegas, Nevada 89107



A handwritten signature, possibly "Ryan E. Johnson", is written in dark ink. The signature is enclosed within a large, hand-drawn oval. A horizontal line is drawn below the oval, extending across the width of the signature area.

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# **EXHIBIT 3**

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# **EXHIBIT 3**

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13314.1

~~MARGOLIN~~  
CWH

1 Matthew D. Francis (6978)  
Adam P. McMillen (10678)  
2 WATSON ROUNDS  
5371 Kietzke Lane  
3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5  
6

7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**  
9

10 JED MARGOLIN, an individual,  
11 Plaintiff,

Case No.: 090C00579 1B

12 vs.

Dept. No.: 1

13 OPTIMA TECHNOLOGY CORPORATION,  
a California corporation, OPTIMA  
14 TECHNOLOGY CORPORATION, a Nevada  
corporation, REZA ZANDIAN  
15 aka GOLAMREZA ZANDIANJAZI  
16 aka GHOLAM REZA ZANDIAN  
aka REZA JAZI aka J. REZA JAZI  
17 aka G. REZA JAZI aka GHONONREZA  
ZANDIAN JAZI, an individual, DOE Companies  
18 1-10, DOE Corporations 11-20, and DOE  
19 Individuals 21-30,  
20 Defendants.

**NOTICE OF ENTRY OF ORDER  
GRANTING PLAINTIFF'S MOTION  
FOR DEBTOR EXAMINATION AND  
TO PRODUCE DOCUMENTS**

21 TO: All parties:

22 **PLEASE TAKE NOTICE** that on January 13, 2014 the Court entered its Order  
23 Granting Plaintiff's Motion for Debtor Examination and to Produce Documents. Attached as  
24 Exhibit 1 is a true and correct copy of the Order Granting Plaintiff's Motion for Debtor  
25 Examination and to Produce Documents.

26 **Affirmation Pursuant to NRS 239B.030**

27 The undersigned does hereby affirm that the preceding document does not contain the  
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social security number of any person.

DATED: January 16, 2014.

WATSON ROUNDS

By: *Adam P. McMillen*

Matthew D. Francis  
Adam P. McMillen  
Watson Rounds  
5371 Kietzke Lane  
Reno, NV 89511

Attorneys for Plaintiff Jed Margolin

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRC 5(b), I certify that I am an employee of Watson Rounds, and that on  
3 this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true  
4 and correct copy of the foregoing document, NOTICE OF ENTRY OF ORDER GRANTING  
5 PLAINTIFF'S MOTION FOR DEBTOR EXAMINATION AND TO PRODUCE  
6 DOCUMENTS, addressed as follows:

7 Optima Technology Corp.  
8 A California corporation  
9 8401 Bonita Downs Road  
Fair Oaks, CA 95628

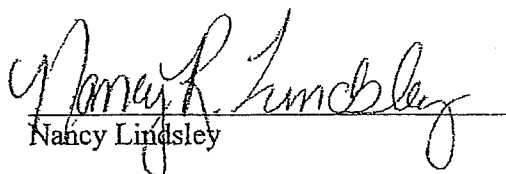
10 Optima Technology Corp.  
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18 8775 Costa Verde Blvd. #501  
San Diego, CA 92122

19 Johnathon Fayeghi, Esq.  
20 Hawkins Melendrez  
21 9555 Hillwood Dr., Suite 150  
Las Vegas, NV 89134  
Counsel for Reza Zandian

22 Dated: This 16<sup>th</sup> day of January, 2014.

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24 Nancy Lindsley  
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# Exhibit 1

Exhibit 1

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Case No. 09 OC 00579 1B  
Dept. No. I

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ALAN GLOVER  
G. Cooper

In The First Judicial District Court of the State of Nevada  
In and for Carson City

JED MARGOLIN, an individual,  
Plaintiff,

vs.

OPTIMA TECHNOLOGY CORPORATION,  
a California corporation, OPTIMA  
TECHNOLOGY CORPORATION, a Nevada  
corporation, REZA ZANDIAN  
aka GOLAMREZA ZANDIANJAZI  
aka GHOLAM REZA ZANDIAN  
aka REZA JAZI aka J. REZA JAZI  
aka G. REZA JAZI aka GHONONREZA  
ZANDIAN JAZI, an individual, DOE Companies  
1-10, DOE Corporations 11-20, and DOE  
Individuals 21-30,  
Defendants.

~~PROPOSED~~ ORDER GRANTING  
PLAINTIFF'S MOTION FOR  
DEBTOR EXAMINATION AND  
TO PRODUCE DOCUMENTS

This matter comes before the Court on Plaintiff JED MARGOLIN's Motion for Debtor Examination and to Produce Documents, filed on December 11, 2013.

The Court finds that Defendants have not opposed the Motion for Debtor Examination and to Produce Documents. The non-opposition by Defendants to Plaintiff's Motion constitutes a consent to the granting of the motion.

The Court finds good cause exists to grant Plaintiff's Motion for Debtor Examination and to Produce Documents.

///  
///  
///

1 NOW, THEREFORE, IT HEREBY IS ORDERED as follows:

2 1. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI  
3 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka  
4 GHONONREZA ZANDIAN JAZI is hereby ordered to appear before the Court and answer  
5 upon oath or affirmation concerning Defendant's property at a Judgment Debtor Examination  
6 under the authority of a Judge of the Court on the following date February 11, 2010, 9:00 AM; and,

7 2. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI  
8 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka  
9 GHONONREZA ZANDIAN JAZI is hereby ordered to produce to Mr. Margolin's counsel at  
10 least one week prior to the Judgment Debtor Examination, so that counsel may effectively  
11 review and question Zandian regarding the documents, all information and documents  
12 identifying, related to, and/or comprising the following:

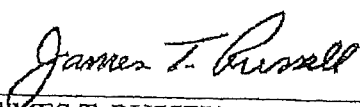
- 14 a. Any and all information and documentation identifying real property, computers,  
15 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and  
16 all other assets that may be available for execution to satisfy the Judgment entered  
17 by the Court, including, but not limited to, information relating to financial  
18 accounts, monies owed to Zandian by others, etc.
- 19 b. Documents sufficient to show Zandian's balance sheet for each month for the years  
20 2007 to the present.
- 21 c. Documents sufficient to show Zandian's gross revenues for each month for the  
22 years 2007 to the present.
- 23 d. Documents sufficient to show Zandian's costs and expenses for each month for the  
24 years 2007 to the present.
- 25 e. All tax returns filed by Zandian with any governmental body for the years 2007 to  
26 the present, including all schedules, W-2's and 1099's.
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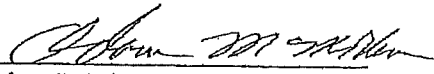
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- f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2007 to the present.
- g. All of Zandian's statements, cancelled checks and related banking documents for any bank, brokerage or other financial account at least partially controlled by Zandian, or recorded in the name of Zandian or for Zandian's benefit, for the years 2007 to the present.
- h. All of Zandian's checkbooks, checkbook stubs and checkbook entries for the years 2007 to the present.
- i. Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence for the years 2007 to the present.
- j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter.
- k. Any settlement agreements by which another party has agreed to pay money to Zandian.

DATED: This 13<sup>th</sup> day of January, 2014.

  
 \_\_\_\_\_  
 JAMES T. RUSSELL  
 DISTRICT COURT JUDGE

Respectfully submitted by,  
WATSON ROUNDS, P.C.

By:   
 Adam P. McMillen, Esquire  
 Nevada Bar No. 10678  
 5371 Kietzke Lane  
 Reno, NV 89511  
 Telephone: (775) 324-4100  
 Facsimile: (775) 333-8171  
 Email: amcmillen@watsonrounds.com  
 Attorney for Plaintiff

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on  
3 this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true  
4 and correct copy of the foregoing document, *Proposed Order Granting Motion for Debtor*  
5 *Examination and for Production of Documents*, addressed as follows:

6 Geoffrey W. Hawkins, Esquire  
7 Johnathon Fayeghi, Esquire  
8 Hawkins Melendrez, P.C.  
9 9555 Hillwood Drive, Suite 150  
10 Las Vegas, Nevada 89134

11 Alborz Zandian  
12 9 Almanzora  
13 Newport Beach, CA 92657-1613

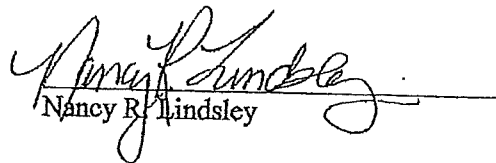
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San Diego, CA 92122

Dated: January 9<sup>th</sup>, 2014

  
Nancy R. Lindsley

RECEIVED