

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

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NOV -6 PM 3: 38
SUSAN MERRIWETHER
CLERK
BY [Signature] DEPUTY

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

7 JED MARGOLIN, an individual,
8 Plaintiff,
9
10 vs.
11 OPTIMA TECHNOLOGY CORPORATION,
12 a California corporation, OPTIMA
13 TECHNOLOGY CORPORATION, a Nevada
14 corporation, REZA ZANDIAN
15 aka GOLAMREZA ZANDIANJAZI
16 aka GHOLAM REZA ZANDIAN
17 aka REZA JAZI aka J. REZA JAZI
18 aka G. REZA JAZI aka GHONONREZA
19 ZANDIAN JAZI, an individual, DOE Companies
20 1-10, DOE Corporations 11-20, and DOE
21 Individuals 21-30,
22 Defendants.

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

23 This matter comes before the Court on Plaintiff Jed Margolin's Motion for Debtor
24 Examination and to Produce Documents, filed on June 10, 2015. On June 29, 2015, Defendant
25 Reza Zandian filed an Opposition and a Motion for Protective Order. On July 10, 2015,
26 Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce
27 Documents and an Opposition to Defendant's Motion for Protective Order. On July 20, 2015,
28 Defendant filed his Reply in Support of the Motion for Protective Order. On November 5,
2015, the Court held oral argument on the motions.

1 After considering the motions, oppositions, replies, oral argument and the papers and
2 pleadings on file herein, for good cause appearing, the Court hereby grants the Motion for
3 Debtor's Examination and to Produce Documents.

4 The Court finds that when Defendants' former attorney, John Peter Lee, withdrew from
5 this matter he provided a last known address for Defendant Zandian in San Diego, California.
6 Based upon this fact and other evidence in the record, the Court finds San Diego, California, is
7 an appropriate location for the debtor's examination of Defendant Reza Zandian.

8
9 NOW, THEREFORE, **IT HEREBY IS ORDERED** as follows:

10 1. That Defendant Reza Zandian is hereby ordered to appear in San Diego, California,
11 during the month of February 2016 and answer upon oath or affirmation concerning his
12 property at a Judgment Debtor Examination, with the specific location in San Diego to be
13 chosen by Plaintiff; and

14 2. That Defendant Reza Zandian is hereby ordered to produce to Plaintiff's counsel on
15 or before December 21, 2015, all of the following information and documents identifying,
16 related to, and/or comprising the following:

- 17
- 18 a. Any and all information and documentation identifying real property, computers,
19 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
20 all other assets that may be currently available for execution to satisfy the
21 Judgments entered by the Court, including, but not limited to, information relating
22 to financial accounts, monies owed to Defendant Zandian by others, etc.
 - 23 b. Documents sufficient to show Zandian's balance sheet for each month from
24 December 11, 2009 (the date the original complaint was filed) to the present.
 - 25 c. Documents sufficient to show Zandian's gross revenues for each month from
26 December 11, 2009 to the present.
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- 1 d. Documents sufficient to show Zandian's costs and expenses for each month from
2 December 11, 2009 to the present.
- 3 e. All tax returns filed by Zandian with any governmental body for the years 2010 to
4 the present, including all schedules, W-2's and 1099's.
- 5 f. All of Zandian's accounting records, computerized electronic and/or printed on
6 paper format for the years 2010 to the present.
- 7 g. All of Zandian's statements, cancelled checks and related banking documents for
8 any bank, brokerage or other financial account at least partially controlled by
9 Zandian, or recorded in the name of Zandian or for Zandian's benefit, from
10 December 11, 2009 to the present.
- 11 h. All of Zandian's checkbooks, checkbook stubs and checkbook entries from
12 December 11, 2009 to the present.
- 13 i. Documents sufficient to show the means and source of payment of Zandian's
14 current residence and any other residence from December 11, 2009 to the present.
- 15 j. Documents sufficient to show the means and source of payment of Zandian's
16 counsel in this matter from December 11, 2009 to the present.
- 17 k. Any settlement agreements by which another party has agreed to pay money to
18 Zandian from December 11, 2009.

19 DATED: This 6th day of November, 2015.

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JAMES T. RUSSELL
DISTRICT COURT JUDGE

1 CERTIFICATE OF MAILING

2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the
3 6th day of November, 2015, I served a copy of the foregoing Order by United States Mail, postage
4 prepaid, addressed as follows:

5 Adam P. McMillen, Esq.
6 5371 Kietzke Lane
7 Reno, NV 89511

8 Severin A. Carlson, Esq.
9 Tara C. Zimmerman, Esq.
10 510 West Fourth Street
11 Carson City, NV 89703



12 Angela Jeffries
13 Judicial Assistant, Dept. 1
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FIRST JUDICIAL DISTRICT COURT MINUTES

CASE NO. 09 OC 00579 1B

TITLE: JED MARGOLIN 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

06/19/12 – DEPT. I – HONORABLE JAMES T. RUSSELL
J. Higgins, Clerk – Not Reported

MINUTE ORDER

COURT ORDERED: A copy of the document entitled Plaintiff's Motion to Compel Appearance of Counsel for Optima Technology Corporations, or in the Alternative, Motion to Strike General Denial of Optima Technology Corporations filed May 15, 2012 is to be used in the place and stead of the original as it is missing.

FIRST JUDICIAL DISTRICT COURT MINUTES

CASE NO. 09 OC 00579 1B

TITLE: JED MARGOLIN 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

11/5/15 – DEPT. I – HONORABLE JAMES T. RUSSELL
J. Higgins, Clerk – Not Reported

MOTION FOR JUDGMENT DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS

Present: Adam McMillen, counsel for Petitioner; Severin Carlson and Tara Zimmerman, counsel for Reza Zandian.

Statements were made by Court and McMillen.

Court addressed Carlson regarding potential conflict with Ms. Zimmerman who was a law clerk for this court and Carlson made statements indicating he did not believe there was any conflict. Statements were made by Court, McMillen and Carlson.

COURT ORDERED: Deft. to appear in San Diego County at a law firm designated by the Pltf. 30 days out.

Upon inquiry by McMillen,

COURT ORDERED: McMillen and Carlson to set a date and time in February and where it is going to be. Production is going to be limited to any and all documents and individuals after December 11, 2009. All discovery is going to be completed within 45 days from today's date.

Statements were made by Court.

McMillen made statements regarding judgment on Mo/Attorney's Fees and Costs.

COURT ORDERED: It will hold that in abeyance until after the February debtor's examination.

Further statements were made by Court.

McMillen to prepare Order.

The Court minutes as stated above are a summary of the proceeding and are not a verbatim record. The hearing held on the above date was recorded on the Court's recording system.

CIVIL COVER SHEET

Carson County, Nevada
Case No. 09OC00579 IB
(Assigned by Clerk's Office)

REC'D & FILED

2009 DEC 11 PM 4:07

Optima Technology, Reza Zandian, aka Golamreza Zandianjazi
DEPUTY CLERK

I. Party Information

Plaintiff(s) (name/address/phone): JED MARGOLIN

Attorney (name/address/phone):
Matthew Francis, Esq, WATSON ROUNDS
5371 Kietzke Ln, Reno, NV 89511 324-4100

Defendant(s) (name/address/phone):

Attorney (name/address/phone):

II. Nature of Controversy (Please check applicable bold category and applicable subcategory, if appropriate)

Arbitration Requested

Civil Cases

<p>Real Property</p> <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Title to Property <input type="checkbox"/> Foreclosure <input type="checkbox"/> Liens <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property <input type="checkbox"/> Partition <input type="checkbox"/> Planning/Zoning	<p>Torts</p> <p>Negligence</p> <input type="checkbox"/> Negligence – Auto <input type="checkbox"/> Negligence – Medical/Dental <input type="checkbox"/> Negligence – Premises Liability (Slip/Fall) <input type="checkbox"/> Negligence – Other	<input type="checkbox"/> Product Liability <input type="checkbox"/> Product Liability/Motor Vehicle <input type="checkbox"/> Other Torts/Product Liability <input checked="" type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Torts/Defamation (Libel/Slander) <input checked="" type="checkbox"/> Interfere with Contract Rights <input type="checkbox"/> Employment Torts (Wrongful termination) <input checked="" type="checkbox"/> Other Torts <input type="checkbox"/> Anti-trust <input checked="" type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Insurance <input type="checkbox"/> Legal Tort <input type="checkbox"/> Unfair Competition
<p>Probate</p> <p>Estimated Estate Value: _____</p> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside Estates <input type="checkbox"/> Trust/Conservatorships <input type="checkbox"/> Individual Trustee <input type="checkbox"/> Corporate Trustee <input type="checkbox"/> Other Probate	<p>Other Civil Filing Types</p> <input type="checkbox"/> Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> General <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Building & Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Other Contracts/Acct/Judgment <input type="checkbox"/> Collection of Actions <input type="checkbox"/> Employment Contract <input type="checkbox"/> Guarantee <input type="checkbox"/> Sale Contract <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Civil Petition for Judicial Review <input type="checkbox"/> Foreclosure Mediation <input type="checkbox"/> Other Administrative Law <input type="checkbox"/> Department of Motor Vehicles <input type="checkbox"/> Worker's Compensation Appeal	<input type="checkbox"/> Appeal from Lower Court (also check applicable civil case box) <input type="checkbox"/> Transfer from Justice Court <input type="checkbox"/> Justice Court Civil Appeal <input type="checkbox"/> Civil Writ <input type="checkbox"/> Other Special Proceeding <input type="checkbox"/> Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input checked="" type="checkbox"/> Conversion of Property <input type="checkbox"/> Damage to Property <input type="checkbox"/> Employment Security <input type="checkbox"/> Enforcement of Judgment <input type="checkbox"/> Foreign Judgment – Civil <input type="checkbox"/> Other Personal Property <input type="checkbox"/> Recovery of Property <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other Civil Matters

III. Business Court Requested (Please check applicable category; for Clark or Washoe Counties only.)

- | | | |
|---|--|---|
| <input type="checkbox"/> NRS Chapters 78-88 | <input type="checkbox"/> Investments (NRS 104 Art. 8) | <input type="checkbox"/> Enhanced Case Mgmt/Business |
| <input type="checkbox"/> Commodities (NRS 90) | <input type="checkbox"/> Deceptive Trade Practices (NRS 598) | <input type="checkbox"/> Other Business Court Matters |
| <input type="checkbox"/> Securities (NRS 90) | <input type="checkbox"/> Trademarks (NRS 600A) | |

December 10, 2009
Date

Signature of initiating party or representative

See other side for family-related case filings.