

1 Adam P. McMillen, Bar No. 10678  
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4 5371 Kietzke Lane,  
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8  
9 Attorney for Plaintiff JED MARGOLIN  
10

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2015 DEC 28 PM 3: 20  
SUSAN MERRIWETHER  
**V. Alegria** CLERK  
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8 IN THE FIRST JUDICIAL COURT OF THE STATE OF NEVADA  
9  
10 IN AND FOR CARSON CITY

11 JED MARGOLIN, an individual,  
12  
13 Plaintiff,

CASE NO.: 090C00579 1B  
DEPT NO.: 1

13 v.

14 OPTIMA TECHNOLOGY  
15 CORPORATION, a California  
16 corporation, OPTIMA TECHNOLOGY  
17 CORPORATION, a Nevada corporation,  
18 REZA ZANDIAN aka GOLAMREZA  
19 ZANDIANJAZI aka GHOLAM REZA  
20 ZANDIAN aka REZA JAZI aka J. REZA  
21 JAZI aka G. REZA JAZI aka  
22 GHONOREZA ZANDIAN JAZI, an  
23 individual, DOES Companies 1-10, DOE  
24 Corporations 11-20, and DOE Individuals  
25 21-30,  
26 Defendants.

**OPPOSITION TO MOTION TO  
WITHDRAW AS COUNSEL**

21 COMES NOW Plaintiff, Jed Margolin, by and through undersigned counsel of record,  
22 Adam P. McMillen of Brownstein Hyatt Farber Schreck, and files this opposition to Severin A.  
23 Carlson, Tara C. Zimmerman and Kaempfer Crowell's Motion to Withdraw as Counsel for  
24 Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi  
25 aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi ("Zandian").  
26

27 This opposition is made and based upon the following points and authorities, the papers  
28 and pleadings on file herein and any other information or oral argument the Court entertains.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Facts**

3 On March 14, 2012, John Peter Lee filed an amended motion to withdraw as counsel for  
4 Zandian and provided the Court and counsel with Zandian's last known address in San Diego.

5 On April 26, 2012, the Court granted John Peter Lee's motion to withdraw.

6  
7 Thereafter, Zandian failed to respond to discovery or any other papers or pleadings in this  
8 matter. As a result, on June 24, 2013, a default judgment was entered against Zandian. On  
9 December 20, 2012, Zandian filed a motion to set aside the default judgment and a notice of  
10 appearance of new counsel (Johnathon Fayeghi, Esq., of the law firm Hawkins Melendrez P.C.).

11 On February 6, 2014, the Court denied the motion to set aside the default judgment.

12 On February 2, 2014, Plaintiff Jed Margolin filed a motion for order to show cause  
13 regarding contempt for Zandian's willful violation of the Court's January 13, 2014 Order granting  
14 Plaintiff's motion for debtor examination and to produce documents. On February 21, 2014,  
15 Zandian filed a substitution of counsel, substituting in the law firm Kaempfer Crowell for  
16 Hawkins Melendrez. On March 12, 2014, Zandian filed a notice of appeal regarding the Court's  
17 order denying the motion to set aside the default judgment. On March 17, 2014, the Court filed  
18 an order denying the request for submission of the motion for order to show cause and stated that  
19 the Court was divested of jurisdiction due to Zandian filing a notice of appeal regarding this  
20 Court's order related to the default judgment.  
21

22 On June 10, 2015, Plaintiff filed another motion for debtor's examination and to produce  
23 documents. On October 19, 2015, the Supreme Court affirmed this Court's orders regarding the  
24 default judgment. On November 6, 2015, after a hearing on the matter, the Court granted the  
25 motion for debtor's examination and to produce documents. In the November 6, 2015 order, the  
26 Court ordered Zandian to appear in San Diego, California, for a debtor's examination during the  
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1 month of February, 2016. The Court also ordered Zandian to produce documents regarding  
2 Zandian’s financial information on or before December 21, 2015.

3 On December 10, 2015, Zandian’s counsel filed the current motion to withdraw as  
4 counsel. Counsel provides two reasons for the motion to withdraw. The first stated reason is that  
5 Zandian has substantially failed to fulfill his obligations to his counsel and further representation  
6 would be a financial burden on counsel. See Motion to Withdraw at 3:1-6. The second stated  
7 reason is that Zandian “insists upon taking action that the lawyer considers repugnant or with  
8 which the lawyer has fundamental disagreement.” See *id.* at 3:7-9. There is no explanation as to  
9 what action counsel considers repugnant or with which he has a fundamental disagreement.

10 Counsel also provided two last known addresses of Zandian: one in Paris, France, and one  
11 in Santa Ana, California. See *id.* at 4:9-14. The Santa Ana address was associated with “Reza  
12 Zandian” and the French address was associated with “Gholam Reza Zandian Jazi.” See *id.*

13 Also on December 10, 2015, Zandian filed a notice of appeal of the order granting  
14 Plaintiff’s motion for debtor examination and to produce documents.

15 On December 15, 2015, Zandian’s counsel filed an errata to their motion to withdraw  
16 stating that Zandian “resides in France” and indicated that the Santa Ana, California, address  
17 belongs to Reza Zandian’s son, Alborz Zandian.

18 On December 16, 2015, Zandian’s counsel filed a motion to withdraw as counsel for  
19 “Appellant Reza Zandian” in the Nevada Supreme Court. See Exhibit 1. The reasons given for  
20 that motion to withdraw are that Zandian has failed to fulfill his obligations and that further  
21 representation would result in an unreasonable financial burden on counsel. *Id.* In addition,  
22 counsel represents that Zandian insists on taking action that his counsel “considers repugnant or  
23 with which counsel has fundamental disagreement.” *Id.* Further, counsel represents that when  
24 Zandian was informed of the November 6, 2015, order regarding the debtor’s examination and to  
25

1 produce documents, Zandian “advised Carlson that he wished to pursue the instant appeal of the  
2 November 6 Order.” Id. Counsel then states that he agreed to file the appeal “solely for the  
3 purpose of preserving Appellant’s appeal.” Id. As in the present motion to withdraw, counsel  
4 fails to explain what it is that counsel finds repugnant or with which counsel has a fundamental  
5 disagreement.

## 6 **II. Legal standard**

7 “While a party may discharge his attorney with or without cause, *Morse v. District Court*,  
8 65 Nev. 275, 195 P.2d 199 (1948), with few limitations, the attorney should not withdraw from a  
9 case except for good cause.” *Matter of Kaufman*, 93 Nev. 452, 456, 567 P.2d 957, 959-60 (1977)  
10 (citing *Page v. Walser*, 46 Nev. 390, 213 P. 107 (1923); *Eisenberg v. Brand, et al.*, 144 Misc.  
11 878, 259 N.Y.S. 57 (1932)). “Except for good cause shown, no application for withdrawal or  
12 substitution shall be granted if a delay of the trial or of the hearing or any other matter in the case  
13 would result. Discharge of an attorney may not be grounds to delay a trial or other hearing.”  
14 FJDCR 22(4) (emphasis added). “When ordered to do so by a tribunal, a lawyer shall continue  
15 representation notwithstanding good cause for terminating the representation.” NRPC 1.16(c)  
16 (emphasis added).  
17

## 18 **III. Allowing counsel to withdraw will delay the production of documents and the** 19 **debtor’s examination that were ordered by this Court on November 6, 2015.**

20 Notwithstanding any potential good cause, allowing counsel to withdraw will delay the  
21 debtor’s examination and the production of documents that were ordered by this Court on  
22 November 6, 2015. The documents were ordered to be produced on or before December 21,  
23 2015. The debtor’s examination was ordered to take place in February, 2016. The motion to  
24 withdraw comes immediately before the deadline to produce documents and shortly before the  
25 debtor’s examination. If counsel is allowed to withdraw now, these items will be unnecessarily  
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1 delayed and Plaintiff will be highly prejudiced thereby. In addition, a delay in these proceedings  
2 will give Zandian time to hide or dispose of assets.

3 **IV. Zandian's last two addresses appear to be unreliable**

4 At the core of Zandian's appeal of this Court's denial of the Motion to Set Aside the  
5 Default Judgment was his counsel's (Kaempfer Crowell's) assertion that it was not reasonable for  
6 Plaintiff or the Court to rely on the address that John Peter Lee (Zandian's first Counsel) provided  
7 when he withdrew. Now counsel is leaving two addresses for Zandian in its motion to withdraw,  
8 one in France and one in Santa Ana, California. Counsel provided a different alias for Zandian  
9 for each address as well. Counsel also indicates that Zandian resides in France and that the Santa  
10 Ana address is for Zandian's son, Alborz. Another problem is that Zandian's French residency  
11 permit expired on August 5, 2015. See Exhibit 2 ("Est autorise(e) a prolonger provisoirement son  
12 sejour en france jusqu' au 05/08/2015" which translates to English as, "Is authorized to  
13 temporarily extend his stay in France until 05/08/2015"). Therefore, it appears that the addresses  
14 that counsel has provided are unreliable and would not allow Plaintiff and the Court to provide  
15 notice to Zandian of the proceedings herein. This unreliability provides another basis for not  
16 allowing counsel to withdraw.

17 In addition, according to FJDCR 22(3), if an attorney withdraws, the attorney must  
18 provide an "address at which the party is to be served with notice of all further proceedings."  
19 Also, SCR 47, when an attorney withdraws another attorney must be appointed or the party must  
20 appear in person. Given the unreliability of the addresses provided to the Court and given  
21 Zandian's history with this case, it would appear that if counsel is permitted to withdraw, Zandian  
22 will ignore this matter and execution of the judgment will be delayed and Plaintiff will be greatly  
23 prejudiced thereby and Zandian will make a mockery of this Court and its orders.

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**V. Counsel has not established good cause**

Counsel has not explained how Zandian has failed to fulfill his obligations or what action Zandian wants to take or that he might have already taken that counsel finds repugnant or with which counsel has a fundamental disagreement. Counsel should be compelled to disclose the actual reasons for the motion to withdraw so that the Court can properly weigh the evidence to determine the propriety of withdrawal. Without providing the basis therefore, there cannot be good cause to withdraw.

**VI. Conclusion**

Based upon the above, counsel's motion to withdraw should be denied. If the Court is in any way inclined to grant the motion, Plaintiff requests an order from the Court requiring Zandian to confirm an address, before any withdrawal, whereby Plaintiff and the Court can communicate regarding this matter with Zandian.

**AFFIRMATION**

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED: December 28 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

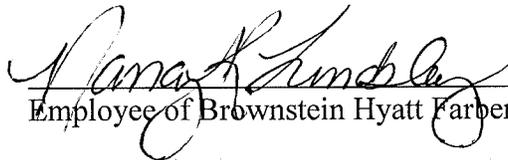
By:  6978 for: \_\_\_\_\_  
Adam P. McMillen  
5371 Kietzke Lane  
Reno, Nevada 89511  
Attorneys for Plaintiff JED MARGOLIN

**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 28<sup>th</sup> day of December, 2015, I served the foregoing document entitled **OPPOSITION TO MOTION TO WITHDRAW AS COUNSEL** via first class mail, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery the following:

Severin A. Carlson  
Tara C. Zimmerman  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, Nevada 89703

DATED: December 28, 2015

  
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Employee of Brownstein Hyatt Farber Schreck, LLP

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# Exhibit 1

Exhibit 1

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

Electronically Filed  
Dec 16 2015 08:43 a.m.

Tracie K. Lindeman  
Clerk of Supreme Court  
**Nevada Supreme Court**  
**Case No. 69372**

REZA ZANDIAN A/K/A GOLAMREZA  
ZANDIANJAZI A/K/A GHOLAM REZA  
ZANDIAN A/K/A REZA JAZI A/K/A J.  
REZA JAZI A/K/A G. REZA JAZI A/K/A  
GHONOREZA ZANDIAN JAZI, an  
individual,

Appellant,

vs.

JED MARGOLIN, an individual,

Respondent.

**MOTION TO WITHDRAW AS COUNSEL**  
**FOR APPELLANT REZA ZANDIAN**

Severin A. Carlson (“Carlson”), Tara C. Zimmerman (“Zimmerman”) and Kaempfer Crowell (collectively “Counsel”), counsel for Appellant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI (“Appellant”), pursuant to Supreme Court Rule (“SCR”) 46 and Nevada Rule of Professional Conduct (“NRPC”) 1.16, move this Court for an order granting Counsel’s motion to withdraw as counsel of record in this matter.

This motion is made based upon the following Points and Authorities and the Affidavit of Severin A. Carlson, attached hereto as **Exhibit 1**.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. FACTUAL BACKGROUND**

Kaempfer Crowell entered an appearance in the First Judicial District Court on behalf of Appellant on or about March 3, 2014, to, among other things, seek to set aside orders of the District Court that had been entered against Appellant, directly and via appeals to this Court.

The District Court, in its November 6, 2015 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents (the "November 6 Order"), attached hereto as **Exhibit 2**, ordered Appellant to produce to counsel for Respondent JED MARGOLIN ("Respondent"), on or before December 21, 2015, various information and documents as set forth in the November 6 Order. The November 6 Order also directed Appellant to appear for a judgment debtor examination at a location to be specified by Respondent's counsel in San Diego, California in February 2016.

Thereafter, Carlson advised Appellant that Counsel would be seeking to withdraw in the District Court proceedings unless Appellant's obligations were fulfilled. At that time, Appellant advised Carlson that he wished to pursue the instant appeal of the November 6 Order. Given the approaching

deadline for filing an appeal, Carlson agreed to file the Notice of Appeal and Case Appeal Statement with the First Judicial District Court on Appellant's behalf, solely for the purpose of preserving Appellant's appeal. Carlson advised Appellant that Counsel would be seeking to withdraw in both the District Court and Nevada Supreme Court proceedings immediately thereafter. Counsel filed a Motion to Withdraw as Counsel in the District Court proceedings on December 10, 2015, the same day the Notice of Appeal was filed.

During Counsel's representation, Appellant has substantially failed to fulfill his obligations to Counsel regarding their services, despite Appellant having been given reasonable warning that Counsel would withdraw unless the obligations were fulfilled. Further representation would result in an unreasonable financial burden on Counsel. The representation has also been rendered unreasonably difficult as a result of Appellant's failure to meet his obligations to Counsel.

Furthermore, Appellant insists upon taking action that Counsel considers repugnant or with which Counsel has fundamental disagreement, therefore making the immediate request to withdraw reasonable.

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## II. ANALYSIS

Rule 1.16(b)(5) of the Nevada Rules of Professional Conduct provides that an attorney may withdraw from representing a client if “[t]he client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given a reasonable warning that the lawyer will withdraw unless the obligation is fulfilled.”

Rule 1.16(b)(4) of the Nevada Rules of Professional Conduct provides that an attorney may withdraw from representing a client if “[a] client insists upon taking action that the lawyer considers to be repugnant or with which the lawyer has a fundamental disagreement.” Furthermore, SCR 46 provides:

The attorney in an action or special proceeding may be changed at any time before judgment or final determination as follows:

- (2) Upon the order of the court or judge thereof on the application of the attorney or the client.

In this case, Appellant has not only substantially failed to fulfill his obligations to Counsel regarding their services, but also insists upon taking action that Counsel considers to be repugnant or with which Counsel has a fundamental disagreement. Consequently, Counsel hereby request that the Court issue an order allowing withdrawal as Appellant’s counsel.

/./././

As set forth in the attached Affidavit of Severin A. Carlson, and based upon information and belief, the last known addresses of Appellant are as follows:

Gholam Reza Zandian Jazi  
6 rue Edouard Fournier  
75116 Paris  
France

Reza Zandian  
c/o Alborz Zandian  
9 MacArthur Place, Unit 2105  
Santa Ana, California 92707-6753

rezazand@hotmail.com

This Motion will be served upon Appellant. No judgment or final determination has been filed in this case other than those previously ordered by the District Court and upheld by this Court.

Counsel has complied with all requirements to withdraw as counsel of record. As such, an order allowing Counsel to withdraw is appropriate. Appellant has been provided a copy of the District Court's November 6 Order, after having been informed of the District Court's ruling from the bench, and therefore is readily aware of the deadlines and requirements set forth in the November 6 Order. Appellant has also been advised of the deadlines before this Court, including this Court's assignment of this case to the Mandatory Settlement Program.

**III. CONCLUSION**

For the reasons stated above, Counsel request an order of this Court allowing them to withdraw as counsel of record for Appellant in this action.

DATED this 15<sup>th</sup> day of December, 2015.

KAEMPFER CROWELL

BY: 

---

SEVERIN A. CARLSON  
Nevada Bar No. 9373  
TARA C. ZIMMERMAN  
Nevada Bar No. 12146  
510 West Fourth Street  
Carson City, Nevada 89703  
**Attorneys for Appellant**

**CERTIFICATE OF SERVICE**

Pursuant to NRAP 25(d), I, the undersigned, hereby certify that on the 15<sup>th</sup> day of December, 2015, I caused the foregoing **MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT REZA ZANDIAN** to be served this date by depositing a true copy of the same for mailing at Reno, Nevada, first class postage fully prepaid and addressed to:

Matthew D. Francis, Esq.  
Adam P. McMillen, Esq.  
Watson Rounds  
5371 Kietzke Lane  
Reno, Nevada 89511  
775.324.4100  
775.333.8171 - facsimile  
**Attorneys for Respondent**

Reza Zandian  
c/o Alborz Zandian  
9 MacArthur Place, Unit 2105  
Santa Ana, California 92707-6753  
**Appellant**

Gholam Reza Zandian Jazi  
6 rue Edouard Fournier  
75116 Paris  
France  
**Appellant**

I also caused the foregoing Motion to be served this date by e-mail to Appellant as follows:

rezazand@hotmail.com

  
an employee of Kaempfer Crowell

# EXHIBIT 1

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# EXHIBIT 1

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

REZA ZANDIAN A/K/A GOLAMREZA  
ZANDIANJAZI A/K/A GHOLAM REZA  
ZANDIAN A/K/A REZA JAZI A/K/A J.  
REZA JAZI A/K/A G. REZA JAZI A/K/A  
GHONOREZA ZANDIAN JAZI, an  
individual,

Appellant,

vs.

JED MARGOLIN, an individual,

Respondent.

**Nevada Supreme Court  
Case No. 69372**

**AFFIDAVIT OF SEVERIN A. CARLSON IN SUPPORT OF  
MOTION TO WITHDRAW AS COUNSEL  
FOR APPELLANT REZA ZANDIAN**

STATE OF NEVADA            )  
  ) ss.  
COUNTY OF WASHOE        )

1. I am duly licensed to practice law in the State of Nevada and am a partner at the law firm of Kaempfer Crowell, as well as counsel for Appellant REZA ZANDIAN (“Appellant”) in the above-entitled matter.

/./././

/./././

2. I have personal knowledge of the facts stated herein, except for those stated upon information and belief and, as to those, I believe them to be true.

3. I make this Affidavit in support of Kaempfer Crowell's Motion to Withdraw as Counsel for Appellant.

4. Continued representation of Appellant will result in an unreasonable financial burden on Kaempfer Crowell and the representation has been rendered unreasonably difficult.

5. Appellant has been repeatedly reminded of his obligations to Kaempfer Crowell and that failure to meet those obligations could result in Kaempfer Crowell withdrawing as counsel of record.

6. Appellant continues to have substantial outstanding obligations to Kaempfer Crowell that remain unrectified.

7. Despite repeated attempts to counsel Appellant, Appellant insists upon taking action that Kaempfer Crowell and I consider to be repugnant or with which we have a fundamental disagreement.

8. Appellant's current mailing address on file with this office, as well as all other known possible addresses are:

Gholam Reza Zandian Jazi  
6 rue Edouard Fournier  
75116 Paris  
France

Reza Zandian  
c/o Alborz Zandian  
9 MacArthur Place, Unit 2105  
Santa Ana, California 92707-6753

rezazand@hotmail.com

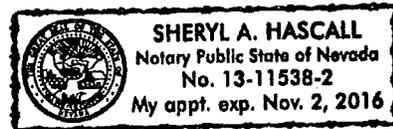
8. That in light of the above, I believe an order allowing Kaempfer Crowell to withdraw from representation in this matter is appropriate and that such withdrawal complies with the applicable rules of professional conduct, Nevada Supreme Court Rules, and Nevada Rules of Appellate Procedure.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 15<sup>th</sup> day of December, 2015.

  
SEVERIN A. CARLSON

Subscribed and Sworn to before me  
this 15<sup>th</sup> day of December, 2015, by  
Severin A. Carlson.



  
NOTARY PUBLIC

My Commission Expires: 11/2/2016

# EXHIBIT 2

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# EXHIBIT 2

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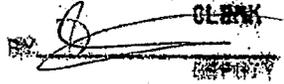
Case No. 09 OC 00579 1B

Dept. No. I

REC'D & FILED

NOV -6 PM 3: 38

SUSAN MERRIWETHER

  
CLERK

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.

**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 June 10, 2015. On June 29, 2015, Defendant Reza Zandian filed an Opposition and a Motion for Protective Order. On July 10, 2015, Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce Documents and an Opposition to Defendant's Motion for Protective Order. On July 20, 2015, 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

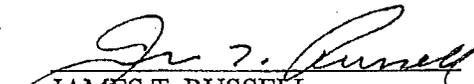
14 2. That Defendant Reza Zandian is hereby ordered to produce to Plaintiff's counsel on  
15 or before December 21, 2015, all of the following information and documents identifying,  
16 related to, and/or comprising the following:

- 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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- d. Documents sufficient to show Zandian's costs and expenses for each month from December 11, 2009 to the present.
  - e. All tax returns filed by Zandian with any governmental body for the years 2010 to the present, including all schedules, W-2's and 1099's.
  - f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2010 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, from December 11, 2009 to the present.
  - h. All of Zandian's checkbooks, checkbook stubs and checkbook entries from December 11, 2009 to the present.
  - i. Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence from December 11, 2009 to the present.
  - j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter from December 11, 2009 to the present.
  - k. Any settlement agreements by which another party has agreed to pay money to Zandian from December 11, 2009.

21 DATED: This 6<sup>th</sup> day of November, 2015.

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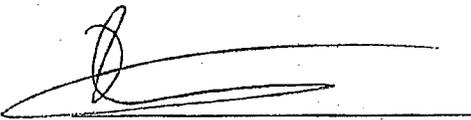
  
JAMES T. RUSSELL  
DISTRICT COURT JUDGE

**CERTIFICATE OF MAILING**

1  
2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the  
3 6<sup>th</sup> 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



Angela Jeffries  
Judicial Assistant, Dept. 1

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Exhibit 2

Exhibit 2

RÉPUBLIQUE FRANCAISE  
AUTORISATION PROVISOIRE DE SEJOUR

PRÉFECTURE PRÉFECTURE DE POLICE  
DOSSIER N° 10ST000000  
ENTRÉE EN FRANCE 15/03/2012  
NOM (M.) ZANDIAN JAZI  
PRÉNOMS GHOLAM REZA  
NÉ(E) LE 15/01/1952 A ISFAHAN  
NATIONALITE IRANIENNE  
ADRESSE 06 RUE EDOUARD FOURNIER  
75116 PARIS

N° 9913081553



SIGNATURE ET CACHET  
DE L'AUTORITE

Pour le Préfet de Police et par délégation  
Le Directeur de la Police Générale

*Cyrille MAILLET*  
Cyrille MAILLET - M1

EST AUTORISÉ(E) A PROLONGER PROVISOIREMENT  
SON SEJOUR EN FRANCE JUSQU'AU 05/08/2015

CETTE AUTORISATION N'EST VALABLE QU'ACCOMPAGNÉE DU DOCUMENT  
NO H95628481 VALABLE DU 05/07/2013 AU 05/07/2018  
JUSTIFIANT DE L'IDENTITÉ DE SON TITULAIRE.

SIGNATURE  
DU TITULAIRE

FAIT A PARIS (CITE)  
LE 06/05/2015

VALABLE JUSQU'AU 05/08/2015  
02455778

CETTE AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

IMPRIMERIE NATIONALE - 36000014 06 11001 0101010