

Notice of Appeal to the Supreme Court From a Judgment or Order of a District Court

No. 09 0C 00579 1B

FILED
2021 FEB 25 PM 1:10

AUDREY BOWLATT
CLERK
Dept. No. 1

BY  DEPUTY

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

Plaintiff } JED MARGOLIN

v. }

Defendant } GHOLAMREZA ZANDIAN JAZI aka REZA ZANDIAN

NOTICE OF APPEAL

Notice is hereby given that C. D., defendant above named, hereby appeals to the Supreme Court of Nevada (from the final judgment) (from the order (describing it)) entered in this action on the 19th day of January, 2021 recorded on January 25, 2021

Address

Per se

Reza Zandian

6 Rue Edouard Fournier

75116 Paris France



0

IN THE SUPREME COURT OF THE STATE OF NEVADA
CARSON CITY

Gholamreza Zandian Jazi aka Reza Zandian,
Appellant,

vs.

Jed Margolin,
Respondent.

Supreme Court No. NA

District Court No. 09 0C 00579 1B Dept. No. 1

APPELLANT'S INFORMAL BRIEF

Judgment or Order You Are Appealing.

List the judgment or order that you are appealing from and the date that the judgment or order was filed in the district court.

Filed Date	Name of Judgment or Order
01/25/2021	ORDER GRANTING PLAINTIFF'S MOTION TO VOID DEEDS, ASSIGN PROPERTY, FOR WRIT OF EXECUTION AND TO CONVEY

Notice of Appeal.

Give the date you filed your notice of appeal in the district court: February 23, 2021

Related Cases.

List all other court cases related to this case. Provide the case number, title of the case and name of the court where the case was filed.

Case No.	Case Title	Name of Court
3:2017-ap-05 016 (nvb)	Sadri et al v. Margolin et al	Bankruptcy court District of Nevada
3:2016-bk-50 644 (nvb)	Patrick Canet and Jazi Gholamreza Zandian	Bankruptcy court District of Nevada

Pro Bono Counsel.

Would you be interested in having pro bono counsel assigned to represent you in this appeal? Yes



Statement of Facts.

Explain the facts of your case. (Your answer must be provided in the space allowed.)

Reza Zandian, an individual, and defendant of this default judgement is in bankruptcy proceedings in France. He can not be served, and his liquidator Patrick Canet is in charge of his bankruptcy proceedings.

The defendants had full knowledge of this fact through Chapter 15 international case filed in Nevada under the above numbers (3:2017-ap-05016 (nvb) and 3:2016-bk-50644 (nvb)). The plaintiff was part of the case and failed to inform the district court about that fact. Further, the plaintiff never lodged any claim in French bankruptcy court, nor in chapter 15 case. The plaintiff failed to send notice of motion to void deeds to the proper person, Patrick Canet in France both in 2016 and 2021.

Statement of District Court Error.

The district court erred in granting plaintiff's motion to void deeds based on fraudulent transfer of properties. In fact, those properties were properly transferred and the transfer was not fraudulent. The transfers were based on an agreement of August 21 2003 signed by the defendant Reza Zandian and notarized in Nevada by Stacy Folkman public notary between the family members and that agreement had priority over a judgement issued 10 years later on June 24th 2013. In fact, the plaintiff never disclosed the above fact to the district court. Those third party beneficiaries of transfers are damaged with this order despite the fact that they were senior creditors.

The judgement subject to this order and this order shall be declared null and void

and the renewal of the judgement was improper since the defendant served the improper person and not strictly respected NRS 17.150(4) which requires the plaintiff and judgement holder to record the last four digits of identification number of the judgement debtor or his driver's license and the parcel numbers together with the last known address of the judgement debtor and assessor parcel numbers of the properties located in each county in addition to the requirements of NRS 17.150(2). The above subject is ruled in a summary judgement and conclusion of law and findings of facts by honorable judge Bruce Beesley in the chapter 15 case.

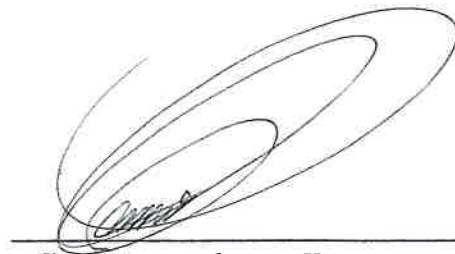
The court erred in its motion to void deeds because there is no lien on the properties. Worsnop v. Karam and Leven v. Frey.

There is significant error and mistake in the method and total calculation of the total amount of the default judgement.

The court erred in the first place and defrauded by plaintiff Jed Margolin based on false address and false proof of service. In fact, Zandian is a resident of France and never lived or stayed in Sacramento, California.

The plaintiff, Jed Margolin, conspired with Sadri in the above case to dismiss the chapter 15 case without consent and knowledge of the liquidator in France in order to obtain the district court order to void deeds despite the fact that the French bankruptcy is ongoing and the next hearing is for April 9 2021 in France.

DATED this 23 day of February, 2021.

A handwritten signature in black ink, appearing to read 'Reza Zandian', is written over a horizontal line. The signature is stylized and somewhat cursive.

Signature of Appellant

Reza Zandian
Print Name of Appellant

3543

CERTIFICATE OF SERVICE

I certify that on the date indicated below, I served a copy of this completed informal brief form upon all parties to the appeal as follows:

- By mailing it by first-class mail with sufficient postage prepaid to the following address(es) (list names and address(es) of parties served):

Matthew D. Francis, Bar No. 6978

mfrancis@bhfs.com

Arthur A. Zorio, Bar No. 6547

azorio@bhfs.com

BROWNSTEIN HYATT FARBER SCHRECK, LLP

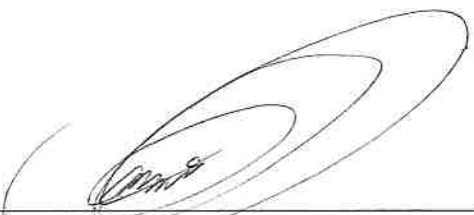
5371 Kietzke Lane,

Reno, Nevada 89511

Telephone: (755) 324-4100

Facsimile: (755) 333-8171

DATED this 23 day of February, 2021.



Signature of Appellant

Reza Zandian
Print Name of Appellant

6 Rue Edouard Fournier, 75116
Address

Paris, France
City/State/Zip

+33:6 - 67 54 0404
Telephone

REC'D & FILED

2021 FEB 25 PM 4:28

AMBER M. BLATT
CLERK
DEPUTY

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

JED MARGOLIN, an individual,

Case No.: 09 OC 00579 1B

Petitioner(s),

Dept. No.: I

vs.

CASE APPEAL STATEMENT

OPTIMA TECHNOLOGY CORPORATION,
a California corporation, OPTIMA
TECHNOLOGY CORPORATION, a Nevada
corporation, REZA ZANDIAN aka
GOLAMREZA ZANDIAN aka REZI JAZI
aka J. REZA JAZI aka G. REZA JAZI aka
GHONOREZA ZANDIAN JAZI, an
individual, DOE Companiess1 - 10, DOE
Corporations1 - 10, and individuals 21-30,
Respondent(s).

1. Name of appellant filing this case appeal statement:

- REZA ZANDIAN

2. Identify the judge issuing the decision, judgment, or order appealed from:

- HONORABLE JAMES T. RUSSELL

3. Identify each appellant and the name and address of counsel for each appellant:

- REZA ZANDIAN
6 RUE EDOUARD FOURNIER
75116 PARIS FRANCE

4. Identify each respondent and the name and address of appellate counsel, if known, for each respondent (if the name of a respondent's appellate counsel is unknown, indicate as much and provide the name and address of that respondent's trial counsel):

1 - JED MARGOLIN
2 MATTHEW FRANCIS
3 ARTHUR ZORIO
4 5371 KIETZKE LANE
5 RENO NV 89511

- 6 5. Indicate whether any attorney identified above in response to question 3 or 4 is not
7 licensed to practice law in Nevada and, if so, whether the district court granted that
8 attorney permission to appear under SCR 42 (attach a copy of any district court order
9 granting such permission):

10 - N/A

- 11 6. Indicate whether appellant was represented by appointed or retained counsel in the
12 district court:

13 - RETAINED
14 SEVERIN CARLSON
15 TARA ZIMMERMAN
16 510 WEST FORTH STREET
17 CARSON CITY NV 89703

- 18 7. Indicate whether appellant is represented by appointed or retained counsel on appeal:

19 - N/A

- 20 8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the date
21 of entry of the district court order granting such leave:

22 - N/A

- 23 9. Indicate the date the proceedings commenced in the district court (e.g., date complaint,
24 indictment, information, or petition was filed):

25 - COMPLAINT FILED December 11, 2009

- 26 10. Provide a brief description of the nature of the action and result in the district court,
27 including the type of judgment or order being appealed and the relief granted by the
28 district court:

- ORDER GRANTING PLAINTIFF'S MOTION TO VOID DEEDS, ASSIGN
PROPERTY, FOR WRIT OF EXECUTION AND TO CONVEY FILED
JANUARY 19, 2021

1 11. Indicate whether the case has previously been the subject of an appeal to or original writ
2 proceeding in the Supreme Court and, if so, the caption and Supreme Court docket
3 number of the prior proceeding:

4 - NOTICE OF APPEAL SUPREME COURT CASE NUMBER 69372

5 12. Indicate whether this appeal involves child custody or visitation:

6 - N/A

7 13. If this is a civil case, indicate whether this appeal involves the possibility of settlement:

8 - NOT APPLICABLE.

9 Dated this 25th day of February, 2021.

10
11 AUBREY ROWLATT, Carson City Clerk
12 885 E. Musser St., #3031
13 Carson City, NV 89701

14 By  Deputy

1 Matthew D. Francis
Nevada Bar No. 6978
2 Arthur A. Zorio
Nevada Bar No. 6547
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
4 Reno, NV 89511
Telephone: 775.324.4100
5 Facsimile: 775.333.8171
Email: mfrancis@bhfs.com
6 azorio@bhfs.com

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BY [Signature] DEPUTY CLERK

7 Attorneys for Plaintiff

8 IN THE FIRST JUDICIAL DISTRICT 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

14 v.

AFFIDAVIT OF JUDGMENT
[NRS 17.150(4)]

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

Defendants.

22 STATE OF NEVADA)
23) ss.
24 COUNTY OF WASHOE)

25 Plaintiff/Judgment Creditor, JED MARGOLIN, by and through his attorneys of the law
26 firm of BROWNSTEIN HYATT FARBER SCHRECK, and pursuant to NRS § 17.150(4),
27 states as follows:

- 28 1. Name and Address of Judgment Debtor ("Judgment Debtor"):

1 Reza Zandian
2 9 MacArthur Place, Unit 2105
3 Santa Ana, CA 92707-6753

4 Gholam Reza Zandian Jazi
5 6 rue Edouard Fournier
6 75116 Paris
7 France

8 2. The Judgment Debtor is an Iranian National and a natural person and according
9 to his French Provisional Residence Authorization (Autorization Provisoire De Sejour) No.
10 xxxxxx1553 holds French Identification No. xxxxx8481.

11 3. The Judgment has been recorded in the following counties located in Nevada, as
12 follows:

County	Document No.	Recording Date
Washoe County	4269631 (Default Judgment)	8/16/2013
	4907598 (Affidavit of Renewal of Judgment)	5/3/2019
Storey County	0119110 (Default Judgment)	8/19/2013
	129569 (Affidavit of Renewal of Judgment)	5/03/2019
Lyon County	511155 (Default Judgment)	8/16/2013
	595465 (Affidavit of Renewal of Judgment)	5/3/2019
Churchill	436437 (Default Judgment)	8/16/2013
	473212 (Affidavit of Renewal of Judgment)	5/3/2019
Clark	20130820001370 (Default Judgment)	8/20/2013
	20190506-0000620 (Affidavit of Renewal of Judgment)	5/6/2019
Elko	677329 (Default Judgment)	8/19/2013
	754086 (Affidavit of Renewal of Judgment)	5/3/2019

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24 4. On January 25, 2021, the Court entered its Order Granting Motion to Void Deeds,
25 Assign Property, for Writ of Execution and to Convey. The assessors' parcel numbers for the
26 real properties located in Nevada subject to the Judgment and the Court's Order Granting
27 Plaintiff's Motion to Void Deeds, Assign Property, for Writ of Execution and to Convey, are as
28

1 follows:

County	APN	Address
Churchill	007-151-12	None
Churchill	007-151-77	None
Churchill	009-331-04	None
Elko	001-660-034	El Armuth Dr, Elko City
Washoe	079-150-12	None
Washoe	079-150-09	None
	079-150-13	
	084-040-04	
	084-040-06	
	084-040-10	
	084-130-07	
	084-040-02	
	084-140-17	
	079-150-10	
Lyon	015-311-02	None
Lyon	015-311-18	None
	015-311-19	
Lyon	006-052-04	125 Pike St, Dayton, NV
	006-052-05	115 Pike St, Dayton, NV
	006-052-06	105 Pike St, Dayton, NV
Clark	071-02-000-005	None
Clark	071-02-000-013	None

5. The Judgment lien is against the following real properties in which the Judgment Debtor is recorded as a legal owner of that real property.

County	APN	Address
Churchill	007-151-77	None
Churchill	009-331-04	None
Elko	001-660-034	El Armuth Dr, Elko Cit
Washoe	079-150-09	None
	079-150-13	
	084-040-04	
	084-040-06	
	084-040-10	
	084-130-07	
	084-040-02	
	084-140-17	
	079-150-10	
Lyon	015-311-02	None
Lyon	015-311-18	None
	015-311-19	
Lyon	006-052-04	125 Pike St, Dayton, NV

	006-052-05	115 Pike St, Dayton, NV
	006-052-06	105 Pike St, Dayton, NV

I have confirmed that the Judgment Debtor is recorded as a legal owner of the
aforementioned real properties.

6. The Order Granting Motion to Void Deeds, Assign Property, for Writ of Execution
and to Convey also applies to the following properties which were previously sold at Sheriffs'
auctions and in which Judgment Debtor thereby ceased being a legal owner at that time.

County	APN	Address
Washoe	079-150-12	None
Washoe	079-150-10	None
Washoe	084-040-02	None
Washoe	084-130-07	None
Clark	071-02-000-005	None
Clark	071-02-000-013	None

I have confirmed that the judgment debtor was, but had ceased being, a legal owner of the
aforementioned real properties.

7. The present Affidavit is made upon my personal knowledge and not upon
information and belief and if called to do so, would testify competently thereto.

AFFIRMATION

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

Jed Margolin
JED MARGOLIN

Subscribed and sworn before me
this 10th day of March, 2021.

Nancy R. Lindsley
Notary Public



CERTIFICATE OF SERVICE

Pursuant to *NRCP 5(b)*, I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and on this 10th day of March, 2021, I served the document entitled **AFFIDAVIT OF JUDGMENT** on the parties listed below in the manner described below:

Reza Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753
(Certified Mail)

Gholam Reza Zandian Jazi
6 Rue Edouard Fournier
75116 Paris
France
(Federal Express)

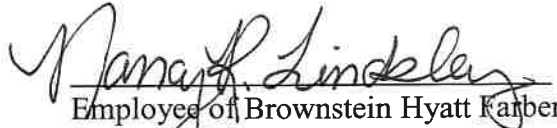
VIA CERTIFIED MAIL U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with certified mailing postage thereon fully prepaid, in the United States mail at Reno, Nevada as addressed to the foregoing party in Santa Ana, California.

VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number as last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by the facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which it was transmitted.

BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

VIA COURIER: by delivering a copy of the document to Federal Express for over-night delivery to the foregoing party in Paris, France.

VIA ELECTRONIC SERVICE: by electronically filing the document with the Clerk of the Court using the ECF system which served the foregoing parties electronically:


Employee of Brownstein Hyatt Farber
Schreck LLP

22371190