



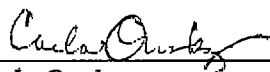
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, a true and correct copy of the foregoing document, **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**, will be served via first-class mail through the U.S. Postal Service, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 82122

Dated: May 15, 2012

  
\_\_\_\_\_  
Carla Ousby

CERTIFICATE OF SERVICE

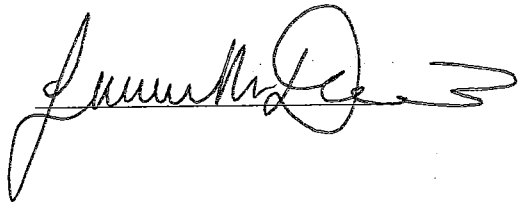
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I hereby certify that on the 28 day of June, 2012, I placed a copy of the foregoing

Order in the United States Mail, postage prepaid, addressed as follows:

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

Reza Zandian  
8775 Costa Verde Blvd. Apt #501  
San Diego, CA 82122



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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Notice of Entry of Order**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd. Apt #501  
San Diego, CA 82122

Dated: June 29, 2012

  
\_\_\_\_\_  
Carla Ousby

CERTIFICATE OF SERVICE

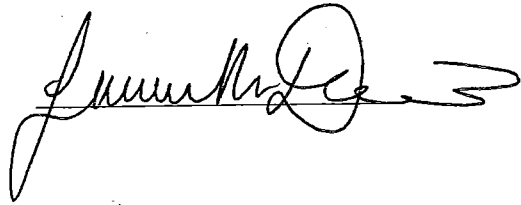
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I hereby certify that on the 29 day of June, 2012, I placed a copy of the foregoing

Order in the United States Mail, postage prepaid, addressed as follows:

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

Reza Zandian  
8775 Costa Verde Blvd. Apt #501  
San Diego, CA 82122



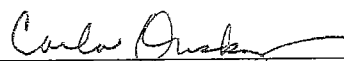
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, a true and correct copy of the foregoing document, will be served via first-class mail through the U.S. Postal Service addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 92122

Dated: September 13, 2012

  
\_\_\_\_\_  
Carla Ousby

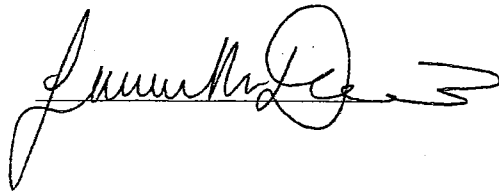
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CERTIFICATE OF SERVICE

I hereby certify that on the 29 day of June, 2012, I placed a copy of the foregoing  
Order in the United States Mail, postage prepaid, addressed as follows:

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

Reza Zandian  
8775 Costa Verde Blvd. Apt #501  
San Diego, CA 82122



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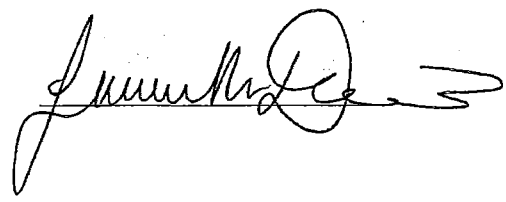
CERTIFICATE OF SERVICE

I hereby certify that on the 29 day of June, 2012, I placed a copy of the foregoing

Order in the United States Mail, postage prepaid, addressed as follows:

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

Reza Zandian  
8775 Costa Verde Blvd. Apt #501  
San Diego, CA 82122





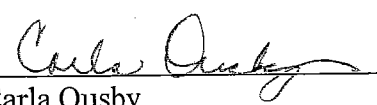
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Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Notice of Entry of Default**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 82122

Dated: September 26, 2012

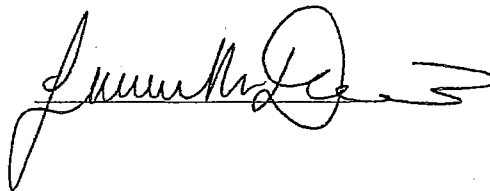
  
Carla Ousby

CERTIFICATE OF SERVICE

I hereby certify that on the 29 day of June, 2012, I placed a copy of the foregoing  
Order in the United States Mail, postage prepaid, addressed as follows:

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

Reza Zandian  
8775 Costa Verde Blvd. Apt #501  
San Diego, CA 82122



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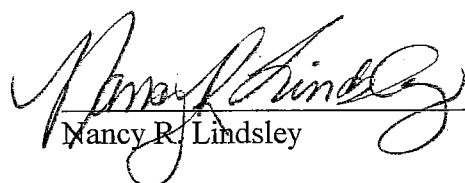
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Notice of Entry of Judgment**, addressed as follows:

Reza Zandian  
8775 Costa Verde Boulevard  
San Diego, CA 92122

Dated: November 5, 2012

  
\_\_\_\_\_  
Nancy R. Lindsley

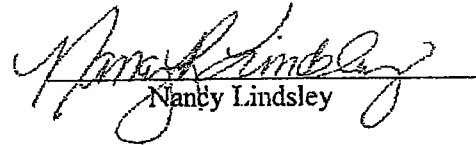
**CERTIFICATE OF SERVICE**

Pursuant to Rule 5(b), Nevada Rules of Civil Procedure, I hereby certify that I am an employee of WATSON ROUNDS, and on this date a true and correct copy of the foregoing document, Plaintiff's Motion for Sanctions Under NRCP 37, will be served on the following by first-class mail through the U.S. Postal Service.

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 92122

Reza Zandian  
8775 Costa Verde Blvd, Apt. 501  
San Diego, CA 92122

Dated: December 14, 2012.

  
Nancy Lindsley

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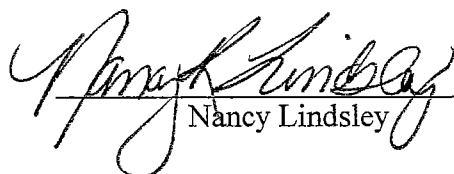
1 CERTIFICATE OF SERVICE

2 Pursuant to Rule 5(b), Nevada Rules of Civil Procedure, I hereby certify that I am an  
3 employee of WATSON ROUNDS, and on this date a true and correct copy of the foregoing  
4 document, **Declaration of Adam P. McMillen in Support of Plaintiff's Motion for Sanctions**  
5 **Under NRCP 37** will be served on the following by first-class mail though the U.S. Postal  
6 Service.

7 Reza Zandian  
8 8775 Costa Verde Blvd.  
9 San Diego, CA 92122

10 Reza Zandian  
11 8775 Costa Verde Blvd, Apt. 501  
12 San Diego, CA 92122

13 Dated: December 14, 2012.

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16 Nancy Lindsley  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Plaintiff's First Set of Interrogatories to Reza Zandian**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 92122

Dated: July 16, 2012

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Carla Ousby

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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Plaintiff's First Set of Requests for Production of Documents Interrogatories to Reza Zandian**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 92122

Dated: July 16, 2012

15/  
Carla Ousby

CERTIFICATE OF SERVICE

1 Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on  
2 this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true  
3 and correct copy of the foregoing document, **Plaintiff's First Set of Requests for Admissions**  
4 **to Reza Zandian**, addressed as follows:

5  
6 Reza Zandian  
7 8775 Costa Verde Blvd.  
8 San Diego, CA 92122

9 Dated: July 16, 2012

10         /5/          
Carla Ousby



September 10, 2012

MICHAEL D. ROUNDS<sup>1</sup>  
MATTHEW D. FRANCIS<sup>2</sup>

ARTHUR A. ZORIO<sup>1</sup>  
RYAN E. JOHNSON  
MATTHEW G. HOLLAND  
ADAM P. McMILLEN<sup>2</sup>  
ADAM YOWELL<sup>1</sup>  
STEVEN CALOJARO<sup>1</sup>

OF COUNSEL-  
KELLY G. WATSON<sup>1</sup>  
MARC D. FOODMAN<sup>1,3</sup>  
STEVEN T. POLIKALAS<sup>1,4</sup>

<sup>1</sup> Also licensed in California  
<sup>2</sup> Also licensed in Utah  
<sup>3</sup> Also licensed in Massachusetts  
<sup>4</sup> Also licensed in Tennessee

5371 Kietzke Lane  
Reno, Nevada 89511  
(775) 324-4100  
Fax (775) 333-8171  
renoinfo@watsonrounds.com

10000 West Charleston Blvd.  
Suite 240  
Las Vegas, Nevada 89135  
(702) 636-4902  
Fax (702) 636-4904  
vegasinfo@watsonrounds.com

One Embarcadero Center  
Suite 4100  
San Francisco, CA 94111  
(415)243-4090  
Fax (415)243-0226  
sfinfo@watsonrounds.com

www.watsonrounds.com

Reply to: Reno\_1

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 92122

Re: *Margolin v. Zandian, et al.*  
First Judicial District Court, Case No. 090C00579 1B

Dear Mr. Zandian:

On July 16, 2012, we served you with Plaintiff's First Set of Requests for Admission. Your responses to those requests were due on or before August 20, 2012. However, you have not yet responded. "The sanction for failure to serve timely answers or objections to requests for admissions is that all matters in the request are deemed admitted." *Wagner v. Carex Investigations & Sec. Inc.*, 93 Nev. 627, 630, 572 P.2d 921, 923 (1977).

Also, on July 16, 2012, we served you with Plaintiff's First Set of Interrogatories. Since you did not respond to the interrogatories, any objections to the interrogatories are deemed waived. *See* NRCP 33(b)(4). In addition, as the requesting party, we "may seek an order compelling discovery if the other party 'fails to answer an interrogatory submitted under Rule 33.'" *United States v. Parker*, 2:08-CV-01200-LDG, 2011 WL 5325475 (D. Nev. 2011) (*citing* Rule 37(a)(3)(B)(iii)). "An evasive or incomplete response must be treated as a failure to respond." *Id.* (*citing* Rule 37(a)(4)).

Also, on July 16, 2012, we served you with Plaintiff's First Set of Requests for Production of Documents. You did not respond to these requests either. "Rule 34 permits each party to serve the opposing party with document requests, and states that the party 'to whom the request is directed must respond in writing within 30 days after being served,' unless the parties stipulate or the court permits a shorter or longer time period." *Haddad v. Interstate Mgmt. Co., LLC*, 2:11-CV-01265-PMP, 2012 WL 398764 (D. Nev. 2012) (*citing* Fed. R. Civ. P. 34(a) and (b)(2)(A)). "If a party fails to file timely objections to [discovery] requests, such failure constitutes a waiver of any objections which a party might have to the requests." *Ramirez v. County of Los Angeles*, 231 F.R.D. 407, 409 (C.D. Cal. 2005) (*quoting* *Krewson v. City of Quincy*, 120 F.R.D. 6, 7 (D. Mass 1988)); *see also Richmark Corp v. Timber Falling Consultants*, 959 F.2d 1468, 1473 (9th Cir. 1992) (holding that the "failure to object to

