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8 *Attorneys for Plaintiff Jed Margolin*

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

11 JED MARGOLIN, an individual,
12 Plaintiff,

13 vs.

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

25 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

MOTION FOR WRIT OF EXECUTION

26 Plaintiff Jed Margolin ("Plaintiff"), by and through his attorneys of record, hereby files
27 the following Motion for Writ of Execution:

POINTS AND AUTHORITIES

28 On June 24, 2013, the Court entered Default Judgment against Defendants. In the
Default Judgment, the Court entered judgment in favor of Plaintiff against Defendants, jointly
and severally, in the sum of \$1,495,775.74, plus interest at the legal rate, pursuant to NRS
17.130, therein from the date of default until the judgment is satisfied. On May 19, 2014, the

1 Court entered an Order Allowing Costs and Necessary Disbursements, allowing post-judgment
2 costs (\$1,355.17), post-judgment attorney's fees (\$31,247.50) and post-judgment interest
3 (\$63,684.40), for a total of \$96,287.07 in post-judgment costs, fees and interest. The Court
4 ordered that the \$96,287.07 be paid by Defendants within 10 days of notice of entry of the
5 Order. Notice of entry of the Order was served on May 20, 2014. On June 9, 2014, Defendant
6 Reza Zandian filed a notice with the Court that he was unable to pay the \$96,287.07 as ordered
7 by the Court.

8 As such, Plaintiff requests that the Court authorize all applicable County Sheriffs in the
9 State of Nevada to execute the Judgment through the seizure of Defendants' bank accounts,
10 investment accounts, certificates of deposit, annuities, wages, and real and personal property.
11 Such an order is appropriate here as no security has been provided to protect the Judgment
12 entered by this Court. Defendants have not obtained a stay of enforcement or posted a bond
13 which would prevent execution of the Judgment.

14 Based on the foregoing and the attached Second Memorandum of Post-Judgment Costs
15 and Fees, attached hereto as Exhibit 1, Plaintiff hereby requests that the Court direct the Court
16 Clerk to issue the attached Writs of Execution, attached hereto as Exhibit 2, so that the
17 Washoe County Sheriff and the Clark County Constable may assist Plaintiff in executing the
18 Default Judgment against Defendants. If those properties are not enough to satisfy the
19 Judgment, Plaintiff requests that the Court order and direct that any further appropriate writs of
20 execution that are provided to the Court Clerk by Plaintiff also be issued, until the Judgment is
21 satisfied.

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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: June 17, 2014.

WATSON ROUNDS

By: *Adam P. McMillen*

Matthew D. Francis (6978)

Adam P. McMillen (10678)

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CERTIFICATE OF SERVICE

1
2 Pursuant to NRCPC 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, MOTION FOR WRIT OF EXECUTION,
5 addressed as follows:

6 Jason D. Woodbury
7 Severin A. Carlson
8 Kaempfer Crowell
9 510 West Fourth Street
10 Carson City, Nevada 89703
11 *Attorneys for Defendant, Reza Zandian*

12 Dated: June 18, 2014

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Marilyn Marsh

INDEX OF EXHIBITS

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Exhibit No.	Description	Pages
1	Second Memorandum of Post-Judgment Costs and Fees	5
2	Writs of Execution (10 original – Washoe County; 2 original Clark County)	37