

IN THE SUPREME COURT OF THE STATE OF NEVADA

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REZA ZANDIAN, AKA GOLAMREZA
ZANDIANJAZI, AKA GHOLAM REZA
ZANDIAN, AKA REZA JAZAI, AKA J.
REZA JAZI AKA G. REZA JAZI, AKA
GHONOREZA ZANDIAN JAZI, AN
INDIVIDUAL

No. 82559

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,

RECORD ON APPEAL

VOL VII

REZA ZANDIAN
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THE SUPREME COURT OF THE STATE OF NEVADA

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

12 **JED MARGOLIN, an individual,**

13 **Plaintiff,**

14 **vs.**

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

26 **Defendants.**

27 **Case No.: 090C00579 1B**

28 **Dept. No.: 1**

**MOTION FOR ORDER TO SHOW
CAUSE REGARDING CONTEMPT**

29 PLEASE TAKE NOTICE that Plaintiff Jed Margolin by and through his attorneys,
30 requests that this Court issue an Order requiring Reza Zandian ("Zandian") to appear and show
31 cause why he should not be held in Contempt of Court for having deliberately and willfully
32 violated the Court's January 13, 2014 Order Granting Plaintiff's Motion for Debtor
33 Examination and to Produce Documents. The Order is attached hereto as Exhibit 1.

34 According to the Order, Zandian was required to:

1 1. Appear before the Court and answer upon oath or affirmation concerning his
2 property at a Judgment Debtor Examination under the authority of a Judge of the Court on
3 February 11, 2014 at 9:00 a.m.; and,

4 2. To produce to Plaintiff's counsel at least one week prior to the Judgment Debtor
5 Examination, all information and documents identifying, related to, and/or comprising the
6 following:

- 7
- 8 a. Any and all information and documentation identifying real property, computers,
9 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
10 all other assets that may be available for execution to satisfy the Judgment entered
11 by the Court, including, but not limited to, information relating to financial
12 accounts, monies owed to Zandian by others, etc.
- 13 b. Documents sufficient to show Zandian's balance sheet for each month for the years
14 2007 to the present.
- 15 c. Documents sufficient to show Zandian's gross revenues for each month for the
16 years 2007 to the present.
- 17 d. Documents sufficient to show Zandian's costs and expenses for each month for the
18 years 2007 to the present.
- 19 e. All tax returns filed by Zandian with any governmental body for the years 2007 to
20 the present, including all schedules, W-2's and 1099's.
- 21 f. All of Zandian's accounting records, computerized electronic and/or printed on
22 paper format for the years 2007 to the present.
- 23 g. All of Zandian's statements, cancelled checks and related banking documents for
24 any bank, brokerage or other financial account at least partially controlled by
25 Zandian, or recorded in the name of Zandian or for Zandian's benefit, for the years
26 2007 to the present.
- 27 h. All of Zandian's checkbooks, checkbook stubs and checkbook entries for the years
28 2007 to the present.

- 1 i. Documents sufficient to show the means and source of payment of Zandian's
2 current residence and any other residence for the years 2007 to the present.
3 j. Documents sufficient to show the means and source of payment of Zandian's
4 counsel in this matter.
5 k. Any settlement agreements by which another party has agreed to pay money to
6 Zandian.

7 *See Exhibit 1.*

8 On February 10, 2014, Zandian's counsel informed Plaintiff's counsel that Zandian "is
9 currently in the middle east on business" and "will not be able to attend the debtor's
10 examination" tomorrow morning in front of Judge Russell. Zandian's counsel also informed
11 Plaintiff's counsel on February 10, 2014, that no documents have been produced regarding the
12 debtor's examination allegedly "due to the short amount of time provided." *See Exhibit 2,*
13 *which is a copy of the February 10, 2014 email, attached hereto.*

14 Without providing any justification, Zandian has violated the Court's Order by not
15 providing the documents to Plaintiff by February 4, 2014, and by refusing and failing to appear
16 at the Court-ordered debtor's examination on February 11, 2014. Plaintiff therefore requests
17 that Zandian be ordered to appear in Court to Show Cause why he should not be held in
18 Contempt of Court.

19 **POINTS AND AUTHORITIES**

20 **I. Background**

21 Plaintiff Jed Margolin is the named inventor on United States Patent No. 5,566,073
22 ("the '073 Patent"), United States Patent No. 5,904,724 ("the '724 Patent"), United States
23 Patent No. 5,978,488 ("the '488 Patent") and United States Patent No. 6,377,436 ("the '436
24 Patent") (collectively "the Patents"). *See Amended Complaint, filed 8/11/11, ¶¶ 9-10.* In
25 2004, Mr. Margolin granted to Robert Adams, then CEO of Optima Technology, Inc. (later
26 renamed Optima Technology Group (hereinafter "OTG"), a Cayman Islands Corporation
27 specializing in aerospace technology) a Power of Attorney regarding the Patents. *Id.* at ¶ 11.
28

1 Subsequently, Mr. Margolin assigned the '073 and '724 Patents to OTG and revoked the
2 Power of Attorney. *Id.* at ¶ 13.

3 In May 2006, OTG and Mr. Margolin licensed the '073 and '724 Patents to Geneva
4 Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to a royalty agreement
5 between Mr. Margolin and OTG. *Id.* at ¶ 12. On or about October 2007, OTG licensed the
6 '073 Patent to Honeywell International, Inc., and Mr. Margolin received a royalty payment
7 pursuant to a royalty agreement between Mr. Margolin and OTG. *Id.* at ¶ 14.

8 On or about December 5, 2007, Zandian filed with the U.S. Patent and Trademark
9 Office ("USPTO") assignment documents allegedly assigning all four of the Patents to Optima
10 Technology Corporation ("OTC"), a company apparently owned by Zandian at the time. *Id.* at
11 ¶ 15. Shortly thereafter, on November 9, 2007, Mr. Margolin, Robert Adams, and OTG were
12 named as defendants in the case titled *Universal Avionics Systems Corporation v. Optima*
13 *Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the "Arizona action"). *Id.* at ¶ 17.
14 Zandian was not a party in the Arizona action. Nevertheless, the plaintiff in the Arizona action
15 asserted that Mr. Margolin and OTG were not the owners of the '073 and '724 Patents, and
16 OTG filed a cross-claim for declaratory relief against Optima Technology Corporation
17 ("OTC") in order to obtain legal title to the respective patents. *Id.*

18 On August 18, 2008, the United States District Court for the District of Arizona
19 entered a default judgment against OTC and found that OTC had no interest in the '073 or
20 '724 Patents, and that the assignment documents filed with the USPTO were "forged, invalid,
21 void, of no force and effect." *Id.* at ¶ 18; *see also* Exhibit B to Zandian's Motion to Dismiss,
22 dated 11/16/11, on file herein.

23 Due to Zandian's acts, title to the Patents was clouded and interfered with Plaintiff's
24 and OTG's ability to license the Patents. *Id.* at ¶ 19. In addition, during the period of time Mr.
25 Margolin worked to correct record title of the Patents in the Arizona action and with the
26 USPTO, he incurred significant litigation and other costs associated with those efforts. *Id.* at ¶
27 20.

28

1 **II. PROCEDURAL BACKGROUND**

2 Plaintiff filed his Complaint on December 11, 2009, and the Complaint was personally
3 served on Zandian on February 2, 2010, and on Defendants Optima Technology Corporation, a
4 Nevada corporation, and Optima Technology Corporation, a California corporation on March
5 21, 2010. Zandian's answer to Plaintiff's Complaint was due on February 22, 2010, but
6 Zandian did not answer the Complaint or respond in any way. Default was entered against
7 Zandian on December 2, 2010, and Plaintiff filed and served a Notice of Entry of Default on
8 Zandian on December 7, 2010 and on his last known attorney on December 16, 2010.

9 The answers of Defendants Optima Technology Corporation, a Nevada corporation,
10 and Optima Technology Corporation, a California corporation, were due on March 8, 2010,
11 but Defendants did not answer the Complaint or respond in any way. Default was entered
12 against Defendants Optima Technology Corporation, a Nevada corporation, and Optima
13 Technology Corporation, a California corporation on December 2, 2010. Plaintiff filed and
14 served a Notice of Entry of Default on the corporate entities on December 7, 2010 and on their
15 last known attorney on December 16, 2010.

16 The defaults were set aside and Zandian's motion to dismiss was denied on August 3,
17 2011. On September 27, 2011, this Court ordered that service of process against all
18 Defendants may be made by publication. As manifested by the affidavits of service, filed
19 herein on November 7, 2011, all Defendants were duly served by publication by November
20 2011.

21 On February 21, 2012, the Court denied Zandian's motion to dismiss the Amended
22 Complaint. On March 5, 2012, Zandian served a General Denial to the Amended Complaint.
23 On March 13, 2012, the corporate Defendants served a General Denial to the Amended
24 Complaint.

25 On June 28, 2012, this Court issued an order requiring the corporate Defendants to
26 retain counsel and that counsel enter an appearance on behalf of the corporate Defendants by
27 July 15, 2012. The June 28, 2012 order further provided that if no such appearance was
28 entered, the corporate Defendants' General Denial would be stricken. Since no appearance

1 was entered on behalf of the corporate Defendants, a default was entered against them on
2 September 24, 2012. A notice of entry of default judgment was filed and served on November
3 6, 2012.

4 On July 16, 2012, Mr. Margolin served Zandian with Mr. Margolin's First Set of
5 Requests for Admission, First Set of Interrogatories, and First Set of Requests for Production
6 of Documents, but Zandian never responded to these discovery requests. As such, on
7 December 14, 2012, Mr. Margolin filed and served a Motion for Sanctions pursuant to NRC
8 37. In this Motion, Mr. Margolin requested this Court strike the General Denial of Zandian,
9 and award Mr. Margolin his fees and costs incurred in bringing the Motion.

10 On January 15, 2013, this Court issued an order striking the General Denial of Zandian
11 and awarding his fees and costs incurred in bringing the NRC 37 Motion. A default was
12 entered against Zandian on March 28, 2013, and a notice of entry of default judgment was
13 filed and served on April 5, 2013.

14 On April 17, 2013, Mr. Margolin filed an Application for Default Judgment, which was
15 served on Zandian and the corporate Defendants. Since Zandian did not respond to the
16 Application for Default Judgment, a Default Judgment was entered on June 24, 2013. Notice
17 of entry of the Default Judgment was served on Zandian on June 26, 2013 and filed on June
18 27, 2013.

19 Over five and a half months later, on December 19, 2013, Zandian served his Motion
20 to Set Aside on Plaintiff. Zandian's Motion to Set Aside claims that he never received any
21 written discovery or notice of the pleadings and papers filed in this matter after his counsel
22 withdrew as his former counsel provided an erroneous last known address to the Court and the
23 parties when he withdrew, and therefore Zandian requests that the judgment be set aside.

24 On February 6, 2014, the Court entered an Order denying Zandian's request to set
25 aside the judgment. The Court found that Zandian failed to show mistake, inadvertence,
26 surprise or excusable neglect pursuant to NRC 60(b) and that "Zandian had every opportunity
27 to properly defend this action and instead made a voluntary choice not to." See Order, dated
28 2/6/14 at 9:14-17.

1 Also, on December 11, 2013, Plaintiff filed the subject motion for judgment debtor
2 examination and to produce documents. Zandian failed to file any opposition to the motion for
3 debtor's examination. Accordingly, on January 13, 2014, the Court granted the motion for
4 debtor examination and to produce documents. On January 16, 2014, Plaintiff served Zandian
5 with notice of entry of the Court's order granting the debtor's examination and the production
6 of documents prior thereto. See Notice of Entry of Order Granting Plaintiff's Motion for
7 Debtor Examination and to Produce Documents, dated 1/16/14, on file herein; see also Exhibit
8 3, Email, dated 1/16/14, Nancy Lindsley (Plaintiff's counsel) to Lauren Kidd (Zandian's
9 counsel), which included a copy of the Order Granting Plaintiff's Motion for Debtor's
10 Examination and to Produce Documents and the Notice of Entry of that order.

11 On February 10, 2014, Zandian's counsel informed Plaintiff's counsel that Zandian "is
12 currently in the middle east on business" and "will not be able to attend the debtor's
13 examination" tomorrow morning in front of Judge Russell. Zandian's counsel also informed
14 Plaintiff's counsel on February 10, 2014, that no documents have been produced regarding the
15 debtor's examination allegedly "due to the short amount of time provided." See Exhibit 2.

16 III. Legal Argument

17 NRS 1.210(3) states that "[t]he Court has the power to compel obedience to its orders."
18 NRS 22.010(3) provides that the "refusal to abide by a lawful order issued by the Court is
19 contempt." See also *Matter of Water Rights of Humboldt River*, 118 Nev. 901, 907, 59 P.3d
20 1226, 1229-30 (2002) (noting that the district court generally has particular knowledge of
21 whether contemptible conduct occurred and thus its decisions regarding contempt are given
22 deference).

23 "Courts have inherent power to enforce their decrees through civil contempt
24 proceedings, and this power cannot be abridged by statute." *In re Determination of Relative
25 Rights of Claimants & Appropriators of Waters of Humboldt River Stream Sys. & Tributaries*,
26 118 Nev. 901, 909, 59 P.3d 1226, 1231 (2002) (citing *Noble v. Noble*, 86 Nev. 459, 463, 470
27 P.2d 430, 432 (1970)). "A civil contempt order may be used to compensate the contemnor's
28

1 adversary for costs incurred because of the contempt.” *Id.* (citing *State, Dep't Indus. Rel. v.*
2 *Albanese*, 112 Nev. 851, 856, 919 P.2d 1067, 1070–71 (1996)).

3 “[D]istrict judges are afforded broad discretion in imposing sanctions” and the Nevada
4 Supreme Court “will not reverse the particular sanctions imposed absent a showing of abuse of
5 discretion.” *State, Dep't of Indus. Relations, Div. of Indus. Ins. Regulation v. Albanese*, 112
6 Nev. 851, 856, 919 P.2d 1067, 1070 (1996) (citing *Young v. Johnny Ribeiro Building*, 106
7 Nev. 88, 92, 787 P.2d 777, 779 (1990)).

8 “Generally, an order for civil contempt must be grounded upon one’s disobedience of
9 an order that spells out ‘the details of compliance in clear, specific and unambiguous terms so
10 that such person will readily know exactly what duties or obligations are imposed on him.’”
11 *Southwest Gas Corp. v. Flintkote Co.*, 99 Nev. 127, 131, 659 P.2d 861, 864 (1983) (quoting *Ex*
12 *parte Slavin*, 412 S.W.2d 43, 44 (Tex.1967)). “[A] sanction for ‘[c]ivil contempt is
13 characterized by the court’s desire to ... compensate the contemnor’s adversary for the injuries
14 which result from the noncompliance.’” *Albanese*, 112 Nev. at 856, 919 P.2d at 1071 (citing
15 *In re Crystal Palace Gambling Hall, Inc.*, 817 F.2d 1361 (9th Cir.1987) (citations omitted)).
16 “However, an award to an opposing party is limited to that party’s actual loss.” *United States*
17 *v. United Mine Workers of America*, 330 U.S. 258, 304, 67 S.Ct. 677, 701, 91 L.Ed. 884
18 (1947); *Shuffler v. Heritage Bank*, 720 F.2d 1141 (9th Cir.1983); *Falstaff*, 702 F.2d at 779.

19 The undisputed facts are crystal clear that Zandian violated this Court’s debtor’s
20 examination Order by failing to produce the documents one week prior to the debtor’s
21 examination and by failing to appear at the debtor’s examination, after he was served with the
22 Order requiring the same. *Supra*. There can be no justification for Zandian’s actions. The full
23 damages to Plaintiff from Zandian’s conduct and contempt for this Court cannot be measured.

24 Plaintiff respectfully requests this Court issue an order to show cause why Zandian
25 should not be held in contempt. Plaintiff further requests that the Court hold Zandian in
26 contempt and award an appropriate compensatory sanction, both to coerce Zandian’s
27 compliance with the debtor’s examination Order as well as compensate Plaintiff for his
28 damages. Plaintiff also respectfully requests that he be awarded his attorney fees and costs

1 associated with bringing the motion for debtor's examination and this motion for order to
2 show cause regarding contempt. If the Court deems that such an award of attorney fees and
3 costs is warranted, Plaintiff will file a subsequent affidavit and cost memorandum.

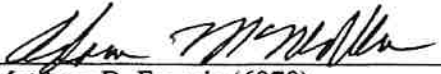
4 **IV. CONCLUSION**

5 For all of the foregoing reasons, this Court should grant Plaintiff's Motion for Order to
6 Show Cause Regarding Contempt.

7 **AFFIRMATION PURSUANT TO NRS 239B.030**

8 The undersigned does hereby affirm that the preceding document does not contain the
9 social security number of any person.

10 Dated this 12th day of February, 2014.

11 BY: 
12 Matthew D. Francis (6978)
13 Adam P. McMillen (10678)
14 WATSON ROUNDS
15 5371 Kietzke Lane
16 Reno, NV 89511
17 Telephone: 775-324-4100
18 Facsimile: 775-333-8171
19 Attorneys for Plaintiff Jed Margolin

20
21
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28

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRC 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 ORDER TO SHOW CAUSE**
5 **REGARDING CONTEMPT**, addressed as follows:

6 Johnathon Fayeghi, Esq.
7 Hawkins Melendrez
8 9555 Hillwood Dr., Suite 150
9 Las Vegas, NV 89134
10 *Counsel for Reza Zandian*

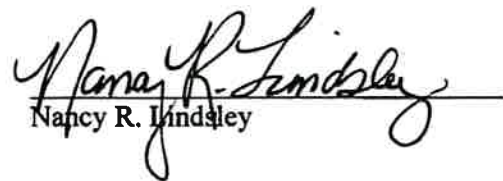
11 Optima Technology Corp.
12 A California corporation
13 8401 Bonita Downs Road
14 Fair Oaks, CA 95628

15 Optima Technology Corp.
16 A Nevada corporation
17 8401 Bonita Downs Road
18 Fair Oaks, CA 95628

19 Optima Technology Corp.
20 A California corporation
21 8775 Costa Verde Blvd. #501
22 San Diego, CA 92122

23 Optima Technology Corp.
24 A Nevada corporation
25 8775 Costa Verde Blvd. #501
26 San Diego, CA 92122

27 Dated: February 12, 2014.

28 
Nancy R. Lindsay

INDEX OF EXHIBITS

Exhibit No.	Title	Number of Pages
1	Order Granting Plaintiff's Motion for Debtor's Examination and to Produce Documents	5
2	Email between counsel regarding failure to comply with Court's Order Granting Plaintiff's Motion for Debtor's Examination and to Produce Documents	4
3	Email from Nancy Lindsley, Plaintiff's counsel's staff, to Lauren Kidd, Defendant Zandian's counsel's staff, transmitting courtesy copies of documents	2

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Exhibit 1

Exhibit 1

1 Case No. 09 OC 00579 1B

2 Dept. No. I

RECEIVED & FILED

2014 JAN 13 PM 4:16

ALAN GLOVER

C. C. COOPER

3
4
5 In The First Judicial District Court of the State of Nevada
6 In and for Carson City

7 JED MARGOLIN, an individual,
8
9 Plaintiff,

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
23 Defendants.

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

19 This matter comes before the Court on Plaintiff JED MARGOLIN's Motion for Debtor
20 Examination and to Produce Documents, filed on December 11, 2013.

21 The Court finds that Defendants have not opposed the Motion for Debtor Examination
22 and to Produce Documents. The non-opposition by Defendants to Plaintiff's Motion constitutes
23 a consent to the granting of the motion.

24 The Court finds good cause exists to grant Plaintiff's Motion for Debtor Examination
25 and to Produce Documents.

26 ///

27 ///

28 ///

1 NOW, THEREFORE, IT HEREBY IS ORDERED as follows:

2 1. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
3 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
4 GHONONREZA ZANDIAN JAZI is hereby ordered to appear before the Court and answer
5 upon oath or affirmation concerning Defendant's property at a Judgment Debtor Examination
6 under the authority of a Judge of the Court on the following date February 11, 2014 @ 9:00^{am}; and,

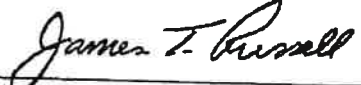
7 2. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
8 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
9 GHONONREZA ZANDIAN JAZI is hereby ordered to produce to Mr. Margolin's counsel at
10 least one week prior to the Judgment Debtor Examination, so that counsel may effectively
11 review and question Zandian regarding the documents, all information and documents
12 identifying, related to, and/or comprising the following:

- 14 a. Any and all information and documentation identifying real property, computers,
15 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
16 all other assets that may be available for execution to satisfy the Judgment entered
17 by the Court, including, but not limited to, information relating to financial
18 accounts, monies owed to Zandian by others, etc.
- 19 b. Documents sufficient to show Zandian's balance sheet for each month for the years
20 2007 to the present.
- 21 c. Documents sufficient to show Zandian's gross revenues for each month for the
22 years 2007 to the present.
- 23 d. Documents sufficient to show Zandian's costs and expenses for each month for the
24 years 2007 to the present.
- 25 e. All tax returns filed by Zandian with any governmental body for the years 2007 to
26 the present, including all schedules, W-2's and 1099's.
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- f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2007 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, for the years 2007 to the present.
- h. All of Zandian's checkbooks, checkbook stubs and checkbook entries for the years 2007 to the present.
- i. Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence for the years 2007 to the present.
- j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter.
- k. Any settlement agreements by which another party has agreed to pay money to Zandian.

DATED: This 13th day of January, 2014.



JAMES T. RUSSELL
DISTRICT COURT JUDGE

Respectfully submitted by,
WATSON ROUNDS, P.C.
By: 
Adam P. McMillen, Esquire
Nevada Bar No. 10678
5371 Kietzke Lane
Reno, NV 89511
Telephone: (775) 324-4100
Facsimile: (775) 333-8171
Email: amcmillen@watsonrounds.com
Attorney for Plaintiff

1 CERTIFICATE OF SERVICE

2 Pursuant to NRC 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, *Proposed Order Granting Motion for Debtor*
5 *Examination and for Production of Documents*, addressed as follows:

6 Geoffrey W. Hawkins, Esquire
7 Johnathon Fayeghi, Esquire
8 Hawkins Melendrez, P.C.
9 9555 Hillwood Drive, Suite 150
10 Las Vegas, Nevada 89134

11 Alborz Zandian
12 9 Almanzora
13 Newport Beach, CA 92657-1613

14 Optima Technology Corp.
15 A California corporation
16 8401 Bonita Downs Road
17 Fair Oaks, CA 95628

18 Optima Technology Corp.
19 A Nevada corporation
20 8401 Bonita Downs Road
21 Fair Oaks, CA 95628

22 Optima Technology Corp.
23 A California corporation
24 8775 Costa Verde Blvd. #501
25 San Diego, CA 92122

26 Optima Technology Corp.
27 A Nevada corporation
28 8775 Costa Verde Blvd. #501
San Diego, CA 92122

Dated: January 9th, 2014

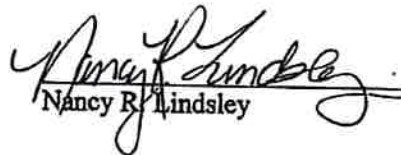

Nancy R. Lindsley

Exhibit 2

Exhibit 2

Adam McMillen

From: John Fayeghi [JFayeghi@hawkinsmelendrez.com]
Sent: Monday, February 10, 2014 8:49 AM
To: Adam McMillen
Cc: Geoffrey Hawkins
Subject: RE: Margolin v. Zandian, et al.

Dear Mr. McMillen,

I apologize for not getting back to you on Friday, I was stuck in deposition all day. With regard to the requested documents, I have not been able to obtain the same from my client due to the short amount of time provided. With regard to the debtor's examination, it is my understanding that Mr. Zandian is currently in the middle east on business. As such, Mr. Zandian will not be able to attend the debtor's examination.

Very truly yours,



Johnathon Fayeghi, Esq.
9555 Hillwood Dr., Ste. 150
Las Vegas, NV 89134
Tel.: 702-318-8800
Fax.: 702-318-8801
jffayeghi@hawkinsmelendrez.com

From: Adam McMillen [mailto:amcmillen@watsonrounds.com]
Sent: Monday, February 10, 2014 8:28 AM
To: John Fayeghi
Cc: Geoffrey Hawkins; Nancy Lindsley
Subject: FW: Margolin v. Zandian, et al.

Hi John,

I still have not heard from you about the documents for tomorrow's debtor's examination. Unless I hear from you otherwise, you leave me no choice but to assume that you will not be providing the ordered documents and I will prepare for tomorrow's examination in front of Judge Russell accordingly, including requesting that Judge Russell issue sanctions for the failure to comply with the order.

Sincerely,

Adam P. McMillen
Attorney at Law

WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511

Telephone: (775) 324-4100
Facsimile: (775) 333-8171
amcmillen@watsonrounds.com

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requirements imposed by U.S. Treasury Regulation Circular 230, we inform you that any U.S. federal tax advice contained in this communication, including any attachments, is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: Adam McMillen
Sent: Friday, February 07, 2014 1:06 PM
To: 'John Fayeghi'
Cc: Geoffrey Hawkins; Matt Francis
Subject: RE: Margolin v. Zandian, et al.

Hi John,

Since I did not hear from you I tried calling your office. However, your receptionist stated that you were just going into a deposition. I was calling to see where you and Zandian are at with regards to the documents and the debtor's examination, as discussed in our emails below. Please let me know the status of those issues.

Thank you,

Adam P. McMillen
Attorney at Law

WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511

Telephone: (775) 324-4100
Facsimile: (775) 333-8171
amcmillen@watsonrounds.com

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From: John Fayeghi [<mailto:JFayeghi@hawkinsmelendrez.com>]
Sent: Thursday, February 06, 2014 4:48 PM
To: Adam McMillen
Cc: Geoffrey Hawkins
Subject: RE: Margolin v. Zandian, et al.

Dear Mr. McMillen,

I am scheduled to have a telephone conference with my client tomorrow morning. I will contact you following said telephone conference.

Very truly yours,

H M HAWKINSMELENDREZ
ATTORNEYS AT LAW

Johnathon Fayeghi, Esq.
9555 Hillwood Dr., Ste. 150
Las Vegas, NV 89134
Tel.: 702-318-8800
Fax.: 702-318-8801
jfayeghi@hawkinsmelendrez.com

From: Adam McMillen [<mailto:amcmillen@watsonrounds.com>]
Sent: Thursday, February 06, 2014 12:52 PM
To: John Fayeghi
Cc: Nancy Lindsley; Lauren Kidd
Subject: FW: Margolin v. Zandian, et al.

Johnathon Fayeghi,

As you know, Zandian has been ordered to attend his debtor's examination on 2/11/14, which is this coming Tuesday. Zandian has also been ordered to produce certain financial documents, as outlined in the attached order. Those documents were supposed to have been produced to my office by no later than 2/4/14 (last Tuesday). Please produce the documents to my office by 2/7/14 (tomorrow) or I will be forced to file a motion for contempt.

Also, do you plan on attending the debtor's examination on 2/11/14? Also, Does Zandian plan on attending the debtor's examination? Please let me know so I can plan accordingly.

Sincerely,

Adam P. McMillen
Attorney at Law

WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511

Telephone: (775) 324-4100
Facsimile: (775) 333-8171
amcmillen@watsonrounds.com

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From: Nancy Lindsley
Sent: Thursday, January 16, 2014 3:16 PM
To: 'Lauren Kidd'
Subject: Margolin v. Zandian, et al.

Dear Ms. Kidd:

Attached please find courtesy copies of documents which have been filed in connection with the above-referenced matter. Please contact us if you have any questions.

Sincerely,

Nancy R. Lindsley
Paralegal to
Matthew D. Francis and
Adam P. McMillen

WATSON
WR
ROUNDS

5371 Kietzke Lane

Reno, NV 89511

Telephone: (775) 324-4100

Facsimile: (775) 333-8171

nlindsley@watsonrounds.com

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Exhibit 3

Exhibit 3

Nancy Lindsley

From: Nancy Lindsley
Sent: Thursday, January 16, 2014 3:16 PM
To: 'Lauren Kidd'
Subject: Margolin v. Zandian, et al.
Attachments: 2014-0113 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents.pdf; 2014-0116 Notice of Entry of Order Granting Debtor Examination.pdf

Dear Ms. Kidd:

Attached please find courtesy copies of documents which have been filed in connection with the above-referenced matter. Please contact us if you have any questions.

Sincerely,

Nancy R. Lindsley
Paralegal to
Matthew D. Francis and
Adam P. McMillen



5371 Kietzke Lane
Reno, NV 89511

Telephone: (775) 324-4100
Facsimile: (775) 333-8171
nlindsley@watsonrounds.com

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REC'D & FILED

2014 FEB 21 PM 3:11

ALAN...
BY *Allycia* CLERK
REPUTY

1 JASON D. WOODBURY
Nevada Bar No. 6870
2 KAEMPFER CROWELL
510 West Fourth Street
3 Carson City, Nevada 89703
Telephone: (775) 884-8300
4 Facsimile: (775) 882-0257
JWoodbury@kcnvlaw.com
5 **Attorneys for Reza Zandian**

6 IN THE FIRST JUDICIAL DISTRICT COURT
7 OF THE STATE OF NEVADA IN AND FOR
8 CARSON CITY

9 JED MARGOLIN, an individual,
10 Plaintiff,

11 vs.

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

Case No. 09OC00579 1B

Dept. No. I

18 Defendants.

19
20 SUBSTITUTION OF COUNSEL

21 COME NOW, the law firm of Kaempfer Crowell Renshaw Gronauer & Fiorentino,
Jason Woodbury, the law firm of Hawkins Melendrez, P.C., Geoffrey W. Hawkins and
22 Johnathon Fayeghi, attorneys for the above-named Defendant Reza Zandian, and
23 hereby give notice that the law firm of Kaempfer Crowell Renshaw Gronauer &
24 Fiorentino is substituted as the attorney of record for the above-named Defendant, Reza

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1 Zandian, in the place and stead of the law firm of Hawkins Melendrez, P.C., Geoffrey W.
2 Hawkins and Johnathon Fayeghi for all purposes in the above-entitled matter. All
3 parties to this substitution further acknowledge their consent to such substitution by
4 their execution of this *Substitution of Counsel*.

5 DATED this 17th day of February, 2014.

6 HAWKINS MELENDREZ, P.C.

7
8 
9 GEOFFREY W. HAWKINS, ESQ.

Nevada Bar No. 7740

10 JOHNATHON FAYEGHI, ESQ.

Nevada Bar No. 12736

11 9555 Hillwood Drive, Suite 150

Las Vegas, NV 89134

12 Telephone: (702) 318-8800

Facsimile: (702) 318-8801

13 e-mail: jfayeghi@hawkinsmelendrez.com

14 Kaempfer Crowell Renshaw Gronauer & Fiorentino hereby accepts substitution
15 as attorneys for the above-named Defendant, Reza Zandian in the place and stead of the
16 law firm of Hawkins Melendrez, P.C. and Johnathon Fayeghi.

17 DATED this 21st day of February, 2014.

18 KAEMPFER CROWELL RENSHAW
19 GRONAUER & FIORENTINO

20 
Jason D. Woodbury

Nevada Bar No. 6870

21 510 West Fourth Street

Carson City NV 89703

22 Telephone (775) 884-8300

Facsimile: (775) 882-0257

23 jwoodbury@kcnvlaw.com

24
CARSON CITY, NEVADA
CITY, STATE AND ZIP CODE
CITY, STATE AND ZIP CODE
CITY, STATE AND ZIP CODE

1 JASON D. WOODBURY
Nevada Bar No. 6870
2 SEVERIN A. CARLSON
Nevada Bar No. 9373
3 KAEMPFER CROWELL
510 West Fourth Street
4 Carson City, Nevada 89703
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5 Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com

6 **Attorneys for Defendant,**
7 **REZA ZANDIAN**

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

10 JED MARGOLIN, an individual,
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12 Plaintiff,
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Case No. 09 OC 00579 1B
Dept. No. I

13 OPTIMA TECHNOLOGY CORPORATION,
a California corporation, OPTIMA
14 TECHNOLOGY CORPORATION, a Nevada
corporation, REZA ZANDIAN aka
15 GOLAMREZA ZANDIANJAZI aka
GHOLAM REZA ZANDIAN aka REZA
16 JAZI aka J. REZA JAZI aka G. REZA JAZI
aka GHONOREZA ZANDIAN JAZI, an
17 individual, DOE Companies 1-10, DOE
Corporations 11-20, and DOE Individuals
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**OPPOSITION TO MOTION FOR ORDER
TO SHOW CAUSE REGARDING CONTEMPT**

21 COMES NOW Defendant, REZA ZANDIAN, by and through his undersigned
22 counsel of record, Kaempfer Crowell, and hereby opposes the *Motion for Order to Show*
23 *Cause Regarding Contempt* ("Motion") filed by Plaintiff in this matter on February 12,
24 2014. This Opposition is made pursuant to FJDCR 15 and is based on NRS 21.270,

REC'D & FILED
2014 MAR -3 PM 4:44
ALAN GLOVER
BY *[Signature]*
DEPUTY

KAEMPFER CROWELL REISHAW
GROMAUER & FIORENTINO
510 W Fourth Street
Carson City, Nevada 89703

1529

1 NRCP 69, the attached Memorandum of Points and Authorities, all papers and
2 pleadings on file herein, and any evidence and argument allowed by the Court at a
3 hearing on the *Motion* granted pursuant to FJDCR 15 or D.C.R. 15.

4 DATED this 3rd day of March, 2014.

5 KAEMPFER CROWELL

6
7 BY: 

8 JASON D. WOODBURY
9 Nevada Bar No. 6870
SEVERIN A. CARLSON
10 Nevada Bar No. 9373
KAEMPFER CROWELL
11 510 West Fourth Street
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12 Telephone: (775) 884-8300
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scarlson@kcnvlaw.com
14 Attorneys for **Defendant, REZA ZANDIAN**

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Factual Background**

3 The following facts are pertinent to this Court's analysis in regard to Plaintiff's
4 request for the issuance of an order to show cause why Reza Zandian should not be held
5 in contempt of this Court:¹

- 6 (1) Reza Zandian does not reside in Carson City, Nevada²;
- 7 (2) On January 13, 2014, this Court issued its *Order Granting Plaintiff's*
8 *Motion for Debtor Examination and to Produce Documents* ("Order for
9 *Debtor Examination*")³;
- 10 (3) On January 16, 2014, counsel for Plaintiff served by regular mail a notice
11 of the entry of the *Order for Debtor Examination* upon counsel for Reza
12 Zandian⁴;

13
14 ¹ Although only a select few facts are relevant to the actual issue before the Court, Plaintiff's *Motion* offers
15 several pages of "background", most of which is obviously designed to engender bad will and disdain for
16 Mr. Zandian. *Motion* at 3:20 – 7:15. This *Opposition* will make no effort—because none is called for—to
17 refute material which is immaterial to the question of whether this Court should issue the requested
18 order. Suffice it to say, for now, that there are two sides to this story.

19 ² This is not to assert that there is no dispute over the residence of Mr. Zandian. Mr. Zandian continues to
20 maintain that he resides in France, while Plaintiff continues to contend that he resides in California.
21 *Compare, e.g., Affidavit of Reza Zandian in Support of Mot. to Set Aside Default J.* at ¶¶2-3 ("I am
22 currently a resident of Paris, France and have been living full-time at 6 Rue Edouard Fournier, 75116
23 Paris, France since August 11, 2011.... I have not resided in the United States since August 2011.") (Jan.
24 17, 2014) (attached hereto and marked as Exhibit 1); *Notice of Appeal* at 1:1-3, 22-25 (identifying Reza
Zandain's address at 6, rue Edouard Fournier, 75116 Paris, France) (Clark County District Court case
number A-11-635430-C, Dept. No. IV) (Mar. 15, 2013) (attached hereto and marked as Exhibit 2) *with,*
e.g., Application for Default J. at 13:5-7, 13-15 (April 16, 2013) (serving Mr. Zandian at one address in Fair
Oaks, California and one address in San Diego, California); *Declaration of Jed Margolin in Support of*
Appl. For Default J. at 5:6-8 (April 16, 2013) (serving Reza Zandian at address in San Diego, California);
Plaintiff's App. for Atty's Fees and Costs at 6:6-10 (serving Reza Zandian at two substantially similar
addresses in San Diego, California) (Feb. 15, 2013); *Complaint* at ¶4 ("On information and belief,
Defendant Reza Zandian ... is an individual who at all relevant times resided in San Diego, California or
Las Vegas, Nevada.") (Dec. 11, 2009). This is by no means an exhaustive recitation of the evidence which
has been offered on the point of Mr. Zandian's residence. In regard to the *Motion*, it does not matter
where Mr. Zandian resides, so long as it is not in Carson City, Nevada. And there has never been any
suggestion or indication by anyone in this case that he does.

³ See *Order Granting Pl.'s Mot. for Debtor Examination and to Produce Documents* (Jan. 13, 2014).

⁴ See *Notice of Entry of Or. Granting Pl.'s Mot. for Debtor Examination and to Produce Documents* (Jan.
16, 2014) (attached hereto and marked as Exhibit 3).

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(4) The *Order for Debtor Examination* required Reza Zandian to appear on February 11, 2014 at 9:00 a.m. before the Court in Carson City, Nevada⁵; and

(5) The *Order for Debtor Examination* required Reza Zandian to produce 11 categories of documents to the office of Plaintiff's counsel no later than February 4, 2014. Those categories of documents included, but were not limited to:

(a) Any and all information and documentation identifying real property, computers, cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and all other assets that may be available for execution to satisfy the Judgment entered by the Court....

(b) Documents sufficient to show Zandian's balance sheet for each month for the years 2007 to present;

(c) Documents sufficient to show Zandian's gross revenues for each month for the years 2007 to present;

(d) Documents sufficient to show Zandian's costs and expenses for each month for the years 2007 to present;

(e) All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2007 to the present;

(f) 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, for the years 2007 to the present;

KEMPFFER CROWELL RENSCHAW
GRONAUER & FIORENTINO
510 W. Fourth Street
Carson City, Nevada 89703

⁵ See *Order for Debtor Examination* at ¶1.

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(g) All of Zandian’s checkbooks, checkbook stubs and checkbook entries for the years 2007 to the present;

(h) Documents sufficient to show the means and source of payment of Zandian’s current residence and any other residence for the years 2007 to present; and

(i) Documents sufficient to show the means and source of payment of Zandian’s counsel in this matter.⁶

As of the date of the *Order for Debtor Examination*, there had been a total of 85 months in the period referenced as “each month for the years 2007 to present.”

II. Argument

A. Reza Zandian is not a resident of Carson City and therefore NRS 21.270 does not authorize his examination in Carson City.

Plaintiff’s request for permission to conduct a debtor’s examination in this case was based upon NRS 21.270, which authorizes and regulates the procedure.⁷ As such, it seems somewhat remarkable that Plaintiff’s *Motion for Judgment Debtor Examination and to Produce Documents* quotes only a portion of the statute.⁸ Unfortunately, that that *Motion* included nothing to alert this Court that only a portion of the controlling statute was included, and that, in fact, the most relevant portion was excluded.

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⁶ See *Order for Debtor Examination* at ¶2(a) – (k).
⁷ See *Motion for Judgment Debtor Examination and to Produce Documents* at 1:24-25 (Dec. 11, 2013).
⁸ See *Motion for Judgment Debtor Examination and to Produce Documents* at 5:25 – 6:2 (1:24-25 (“Under Nevada procedure, Mr. Margolin is entitled to a debtor examination. NRS 21.270 states that ‘a judgment creditor, at any time after the judgment is entered, is entitled to an order from the judge of the court requiring the judgment debtor to appear and answer upon oath or affirmation concerning his or her

KAEMPFER CROWELL REMBAW
GRONAUER & FIORENTINO
510 W. Fourth Street
Carson City, Nevada 89703

1 In its entirety, NRS 21.270(1) provides:

- 2 1. A judgment creditor, at any time after the judgment is entered, is entitled
3 to an order from the judge of the court requiring the judgment debtor to appear
4 and to answer upon oath or affirmation concerning his or her property, before:
5 (a) The judge or a master appointed by the judge; or
6 (b) An attorney representing the judgment creditor,
7 at a time and place specified in the order. **No judgment debtor may be**
8 **required to appear outside the county in which the judgment debtor**
9 **resides.**

10 (Emphasis added).

11 The emphasized provision could not be more clear and explicit. Under *anyone's*
12 interpretation of the evidence pertaining to the residence of Reza Zandian, there is no
13 information indicating that he resides in Carson City, Nevada—or that he ever has, for
14 that matter. Therefore, NRS 21.270 does not permit him to be the subject of a debtor's
15 examination here. The *Order for Debtor's Examination* should have never been issued.
16 Indeed, it is virtually certain that, had the applicable law been quoted or explained in its
17 entirety, this Court never would have issued such an order.⁹

18 As the *Order for Debtor's Examination* is contrary to NRS 21.270 in the first
19 place, Mr. Zandian should not be held in contempt for a failure to comply with the
20 requirements of that order, insofar as it required to personally present himself in Carson
21 City, Nevada for examination. For this reason, this Court should deny the *Motion*.

22 \\ \\ \\

23 \\ \\ \\

24 \\ \\ \\

property' at an examination either before 1) the judge or master appointed by the judge or 2) an attorney representing the judgment creditor. NRS 21.270(1)").

⁹ To be fair, the fact that the *Motion for Judgment Debtor Examination and to Produce Documents* was unopposed by then-counsel for Reza Zandian bears a fair share of the responsibility for the oversight. The invalidity of the order subjecting Mr. Zandian to a debtor's examination should have been presented to this Court in the context of an opposition. Nonetheless, the failure to respond does not expand the scope of this Court's lawful authority beyond that which is authorized. In other words, the law is what the law is.

1 **B. Reza Zandian should not be held in contempt for failing to**
2 **comply with a requirement reducing by half his time to respond**
3 **to an ordered document production.**

4 Next, Plaintiff complains that Mr. Zandian failed to comply with this Court's
5 *Order for Debtor's Examination* "by failing to produce the documents one week prior to
6 the debtor's examination."¹⁰ Once again, Plaintiff takes generous—and unauthorized—
7 liberties with the procedural regulation of supplementary proceedings in aid of
8 judgment execution.

9 NRCP 69(a) provides:

10 (a) *In general.* Process to enforce a judgment for the payment of money shall
11 be a writ of execution, unless the court directs otherwise. The procedure on
12 execution, in proceedings supplementary to and in aid of a judgment, and in
13 proceedings on and in aid of execution shall be in accordance with the practice
14 and procedure of the State. ***In aid of the judgment or execution, the***
15 ***judgment creditor*** or a successor in interest when that interest appears of
16 record, ***may obtain discovery from any person, including the***
17 ***judgment debtor, in the manner provided in these rules.***

18 (Emphasis added).

19 The emphasized language permits Plaintiff, as the judgment creditor, to utilize
20 the discovery techniques set forth in the Nevada Rules of Civil Procedure. As such, the
21 *Order for Debtor's Examination*, insofar as it required the production of documents by
22 Reza Zandian, is sound. However, the term "in the manner provided in these rules" is
23 more than an authorization. It is also a limitation. That is, the language authorizes the
24 use of discovery techniques, but requires them to be exercised in accordance with the
25 Nevada Rules of Civil Procedure.

26 The production of documents is governed by NRCP 34. Under that rule, a party,
27 in this case Reza Zandian, would be allowed 30 days to serve a written response to a

28 And the failure to present an accurate statement of the law in a timely fashion, while regrettable in this
29 instance, does not change the lawful authority—and limitations thereon—of this Court.

¹⁰ See *Motion* at 8:20-21.

1 request for the production of documents.¹¹ Applied in the context of this case, 30 days
2 from service of the *Order for Debtor's Examination* would have required the document
3 disclosure by February 18, 2014.¹² Of course, Reza Zandian's time for production was
4 drastically reduced from that to February 4, 2014. The result was a requirement that
5 Reza Zandian produce 11 categories of documents, several of which required 85 months
6 of information, within two weeks—half of the time allotted for a “normal” document
7 production.¹³

8 Of course, this Court has the authority to compel a shorter or allow a longer time
9 than 30 days to produce documents in accordance with NRC 34.¹⁴ And while Plaintiff
10 may contend that this authority was invoked by the Court in its *Order for Debtor's*
11 *Examination*, the contention seems dubious for two reasons. First, Plaintiff's *Motion*
12 *for Judgment Debtor Examination and to Produce Documents* includes no discussion
13 supporting a request to shorten the time for production. And, second, there is, in fact,
14 no urgency to limit the time frame for the production of the requested documents. The
15 judgment in this case has existed for quite some time prior to the request for
16 supplementary proceedings. In regard to that judgment, the interests of Plaintiff are
17 protected from fraudulent transfers by Chapter 112 of Nevada Revised Statutes. Other
18 than Plaintiff's yearn to expedite execution—shared by nearly all judgment creditors
19 throughout history—there is no meaningful reason to reduce by half the opportunity for
20

21 ¹¹ See NRC 34(b) (“The party upon whom the request is served shall serve a written response within 30
days after the service of the request.”)

22 ¹² See NRC 6.

23 ¹³ Again, it must be conceded that it would have been far better to present this position in the context of an
opposition to the *Motion for Judgment Debtor Examination and to Produce Documents*. But be that as it
24 may, counsel for Reza Zandian did alert Plaintiff's counsel in advance that it would not be possible to
comply with the order's production requirement “due to the short amount of time provided.” Exhibit 2 to
Motion.

¹⁴ NRC 34(b) (“A shorter or longer time may be directed by the court....”)

1 Reza Zandian to respond to the expansive request set forth in the Order for Debtor's
2 Examination.

3 These circumstances do not warrant a determination that Reza Zandian is in
4 contempt of this Court or that the sanctions which Plaintiff requests should be imposed.
5 For this reason, this Court should deny the Motion at this time.

6 **III. Conclusion**

7 For these reasons, it is respectfully requested that this Court enter an order
8 denying the Motion.

9 DATED this 3rd day of March, 2014.

10 KAEMPFER CROWELL

11
12 BY: 

13 JASON D. WOODBURY

Nevada Bar No. 6870

14 SEVERIN A. CARLSON

Nevada Bar No. 9373

15 KAEMPFER CROWELL

510 West Fourth Street

16 Carson City, Nevada 89703

Telephone: (775) 884-8300

17 Facsimile: (775) 882-0257

e-mail: jwoodbury@kcnvlaw.com

18 scarlson@kcnvlaw.com

Attorneys for **Defendant, REZA ZANDIAN**

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that service of the foregoing
3 **OPPOSITION TO MOTION FOR ORDER TO SHOW CAUSE REGARDING**
4 **CONTEMPT** was made this date by depositing a true and correct copy of the document
5 in the United States mail, postage pre-paid at Carson City, Nevada, addressed to:

6 Matthew D. Francis
7 Adam P. McMillen
8 WATSON ROUNDS
9 5371 Kietzke Lane
10 Reno, NV 89511
11 *Attorneys for Plaintiff Jed Margolin*

12 DATED this 3rd day of March, 2014.

13 

14 An employee of Kaempfer Crowell
15
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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 GHONOREZA
ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-
20, and DOE Individuals 21-30,**

Defendants.

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

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

**EXHIBIT INDEX
to
Opposition Motion for Order to Show Cause Regarding Contempt**

Exhibit No.	Description of Exhibit	Exhibit Pages
1	<i>Affidavit of Reza Zandian in Support of Motion to Set Aside Default Judgment (Jan. 17, 2014)</i>	2
2	<i>Notice of Appeal (Mar. 15, 2013)</i>	2
3	<i>Notice of Entry of Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents (Jan. 16, 2014)</i>	8

EXHIBIT 1

EXHIBIT 1

1 AFFIDAVIT OF REZA ZANDIAN IN SUPPORT OF MOTION TO SET ASIDE DEFAULT
2 JUDGMENT

3
4 COUNTRY OF FRANCE)
5) ss
6 CITY OF PARIS)

7 I, Reza Zandian, have personal knowledge of the matters set forth herein and being first duly
8 sworn hereby depose and state as follows:

9 1. I am a named Defendant in the matter of *Jed Margolin vs. Optima Technology*
10 *Corporation, et al.*, Case No. 090C00579 1B.

11 2. That I am currently a resident of Paris, France and have been living full-time at 6
12 Rue Edouard Fournier, 75116 Paris, France since August 2011.

13 3. That I have not resided in the United States since August 2011. Specifically, I have
14 not resided at 8775 Costa Verde Blvd, San Diego, CA 92122 since August 2011.

15 4. Since the withdrawal of my previous counsel, John Peter Lee, Esq., on April 26,
16 2012 I have never received any pleadings or written discovery related to Case No. 090C00579 1B.

17 5. I learned of the Default Judgment in late November 2013 while visiting the United
18 States of America on business. I was advised of the Default Judgment by a business associate by
19 the name of Fred Sadri.

20 ///
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CAROLINE AL TAWIL
Conseillère de Clientèle
Agence Paris Passy

HAWKINS MELENDEZ, P.C.
9555 Hillwood Drive, Suite 150
Las Vegas, Nevada 89134
Telephone (702) 318-8800 • Facsimile (702) 319-9801

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I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed this 17 day of January, 2014.


REZA ZANDIAN

Subscribed and Sworn to before me this 17 day of January, 2014.

CAROLINE AL TAWIL
Conseillère de Clientèle
~~Agence Paris Passy~~

Notary Public in and for Said State and County

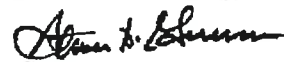
(SEAL)

HAWKINS MELENDEZ, P.C.
9356 Hillwood Drive, Suite 150
Las Vegas, Nevada 89134
Telephone: (702) 318-8800 / Facsimile: (702) 318-8801

EXHIBIT 2

EXHIBIT 2

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03/15/2013 02:33:18 PM



CLERK OF THE COURT

1 NOAS
2 REZA ZANDIAN
3 6, rue Edouard Fournier
4 75116 Paris, France
5 Pro Per Appellant

6 DISTRICT COURT
7 CLARK COUNTY, NEVADA

8 GHOLAMREZA ZANDIAN JAZI, also
9 known as REZA ZANDIAN, individually,

CASE NO.: A-11-635430-C
DEPT. NO.: IV

10 Plaintiff,

11 v.

12 FIRST AMERICAN TITLE COMPANY, a
13 Nevada business entity; JOHNSON SPRING
14 WATER COMPANY, LLC, formerly known
15 as BIG SPRING RANCH, LLC, a Nevada
16 Limited Liability Company, FRED SADRI,
17 Trustee of the Star Living Trust, RAY
18 KOROGHLI, individually, and ELIAS
19 ABRISHAMI, individually,

20 Defendants.

21 AND ALL RELATED COUNTERCLAIMS
22 AND THIRD-PARTY CLAIMS

23 1334.024072-4d

24 **NOTICE OF APPEAL**

25 Notice is hereby given that REZA ZANDIAN a member of the above named company,
26 hereby appeals to the Supreme Court of Nevada from the Order to Distribute Attorney Fee and Costs
27 Awards to Defendants entered in this action on the 15th day of February, 2013.

28 DATED this 15th day of March, 2013.

BY: 
REZA ZANDIAN
6, rue Edouard Fournier
75116 Paris, France
Pro Per Appellant

CERTIFICATE OF MAILING

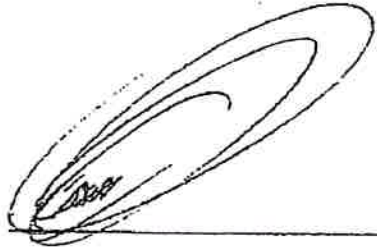
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I HEREBY CERTIFY that on the ___ day of March, 2013, I served a copy of the above and foregoing NOTICE OF APPEAL, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully prepaid addressed to:

Stanley W. Parry
100 North City Parkway, Ste. 1750
Las Vegas, Nevada 89106

Elias Abrishami
P.O. Box 10476
Beverly Hills, California 90213

Ryan E. Johnson, Esq.
Watson & Reunds
777 North Rainbow Blvd. Ste. 350
Las Vegas, Nevada 89107



A handwritten signature in dark ink, appearing to be 'Ryan E. Johnson', is written over a horizontal line. The signature is somewhat stylized and loops around the line.

EXHIBIT 3

EXHIBIT 3

13214.1
~~MARGOLIN~~
CWH

1 Matthew D. Francis (6978)
Adam P. McMillen (10678)
2 WATSON ROUNDS
5371 Kietzke Lane
3 Reno, NV 89511
Telephone: 775-324-4100
4 Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

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

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

Case No.: 090C00579 1B
Dept. No.: 1

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

21 TO: All parties:
22 PLEASE TAKE NOTICE that on January 13, 2014 the Court entered its Order
23 Granting Plaintiff's Motion for Debtor Examination and to Produce Documents. Attached as
24 Exhibit 1 is a true and correct copy of the Order Granting Plaintiff's Motion for Debtor
25 Examination and to Produce Documents.

Affirmation Pursuant to NRS 239B.030

27 The undersigned does hereby affirm that the preceding document does not contain the
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social security number of any person.

DATED: January 16, 2014.

WATSON ROUNDS

By: *Adam P. McMillen*

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

Attorneys for Plaintiff Jed Margolin

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 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, NOTICE OF ENTRY OF ORDER GRANTING
5 PLAINTIFF'S MOTION FOR DEBTOR EXAMINATION AND TO PRODUCE
6 DOCUMENTS, addressed as follows:

7 Optima Technology Corp.
8 A California corporation
9 8401 Bonita Downs Road
Fair Oaks, CA 95628

10 Optima Technology Corp.
11 A Nevada corporation
12 8401 Bonita Downs Road
Fair Oaks, CA 95628

13 Optima Technology Corp.
14 A California corporation
15 8775 Costa Verde Blvd. #501
San Diego, CA 92122

16 Optima Technology Corp.
17 A Nevada corporation
18 8775 Costa Verde Blvd. #501
San Diego, CA 92122

19 Johnathon Fayeghi, Esq.
20 Hawkins Melendrez
21 9555 Hillwood Dr., Suite 150
Las Vegas, NV 89134
Counsel for Reza Zandian

22 Dated: This 16th day of January, 2014.

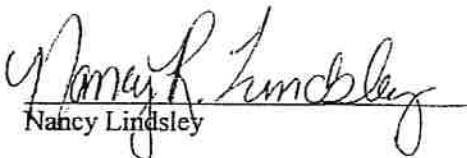
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25 Nancy Lindsley
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Exhibit 1

Exhibit 1

1 Case No. 09 0C 00579 1B
2 Dept. No. I

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2014 JAN 13 PM 4:16
ALAN GLOVER
C. COOPER

3
4
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 vs.

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

[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION FOR
DEBTOR EXAMINATION AND
TO PRODUCE DOCUMENTS

22 This matter comes before the Court on Plaintiff JED MARGOLIN's Motion for Debtor
23 Examination and to Produce Documents, filed on December 11, 2013.

24 The Court finds that Defendants have not opposed the Motion for Debtor Examination
25 and to Produce Documents. The non-opposition by Defendants to Plaintiff's Motion constitutes
26 a consent to the granting of the motion.

27 The Court finds good cause exists to grant Plaintiff's Motion for Debtor Examination
28 and to Produce Documents.

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1 NOW, THEREFORE, IT HEREBY IS ORDERED as follows:

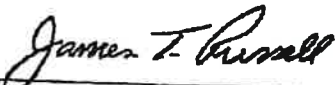
2 1. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
3 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
4 GHONONREZA ZANDIAN JAZI is hereby ordered to appear before the Court and answer
5 upon oath or affirmation concerning Defendant's property at a Judgment Debtor Examination
6 under the authority of a Judge of the Court on the following date February 11, 2014 @ 9:00 am; and,

7 2. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
8 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
9 GHONONREZA ZANDIAN JAZI is hereby ordered to produce to Mr. Margolin's counsel at
10 least one week prior to the Judgment Debtor Examination, so that counsel may effectively
11 review and question Zandian regarding the documents, all information and documents
12 identifying, related to, and/or comprising the following:

- 14 a. Any and all information and documentation identifying real property, computers,
15 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
16 all other assets that may be available for execution to satisfy the Judgment entered
17 by the Court, including, but not limited to, information relating to financial
18 accounts, monies owed to Zandian by others, etc.
- 19 b. Documents sufficient to show Zandian's balance sheet for each month for the years
20 2007 to the present.
- 21 c. Documents sufficient to show Zandian's gross revenues for each month for the
22 years 2007 to the present.
- 23 d. Documents sufficient to show Zandian's costs and expenses for each month for the
24 years 2007 to the present.
- 25 e. All tax returns filed by Zandian with any governmental body for the years 2007 to
26 the present, including all schedules, W-2's and 1099's.
- 27
- 28


- 1 f. All of Zandian's accounting records, computerized electronic and/or printed on
2 paper format for the years 2007 to the present.
- 3 g. All of Zandian's statements, cancelled checks and related banking documents for
4 any bank, brokerage or other financial account at least partially controlled by
5 Zandian, or recorded in the name of Zandian or for Zandian's benefit, for the years
6 2007 to the present.
- 7 h. All of Zandian's checkbooks, checkbook stubs and checkbook entries for the years
8 2007 to the present.
- 9 i. Documents sufficient to show the means and source of payment of Zandian's
10 current residence and any other residence for the years 2007 to the present.
- 11 j. Documents sufficient to show the means and source of payment of Zandian's
12 counsel in this matter.
- 13 k. Any settlement agreements by which another party has agreed to pay money to
14 Zandian.

15 DATED: This 13th day of January, 2014.

16
17 
18 JAMES T. RUSSELL
DISTRICT COURT JUDGE

19 Respectfully submitted by,

20 WATSON ROUNDS, P.C.

21 By: 
22 Adam P. McMillen, Esquire
23 Nevada Bar No. 10678
5371 Kietzke Lane
24 Reno, NV 89511
25 Telephone: (775) 324-4100
26 Facsimile: (775) 333-8171
Email: amcmillen@watsonrounds.com
Attorney for Plaintiff

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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, *Proposed Order Granting Motion for Debtor Examination and for Production of Documents*, addressed as follows:

Geoffrey W. Hawkins, Esquire
Johnathon Fayeghi, Esquire
Hawkins Melendrez, P.C.
9555 Hillwood Drive, Suite 150
Las Vegas, Nevada 89134

Alborz Zandian
9 Almanzora
Newport Beach, CA 92657-1613

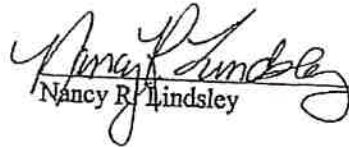
Optima Technology Corp.
A California corporation
8401 Bonita Downs Road
Fair Oaks, CA 95628

Optima Technology Corp.
A Nevada corporation
8401 Bonita Downs Road
Fair Oaks, CA 95628

Optima Technology Corp.
A California corporation
8775 Costa Verde Blvd. #501
San Diego, CA 92122

Optima Technology Corp.
A Nevada corporation
8775 Costa Verde Blvd. #501
San Diego, CA 92122

Dated: January 9th, 2014


Nancy R. Lindsley

1 Matthew D. Francis (6978)
Adam P. McMillen (10678)
2 WATSON ROUNDS
5371 Kietzke Lane
3 Reno, NV 89511
Telephone: 775-324-4100
4 Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

REC'D & FILED
2014 FEB 10 PM 3:19
ALAN GEORGE
CLERK
BY *[Signature]*
DEPUTY

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

10 **JED MARGOLIN, an individual,**
11 **Plaintiff,**

12 **vs.**

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

20 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

NOTICE OF ENTRY OF ORDER

21
22 TO: All parties:

23 **PLEASE TAKE NOTICE** that on February 6, 2014, the Court entered its Order
24 Denying Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka
25 Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi's Motion to Set

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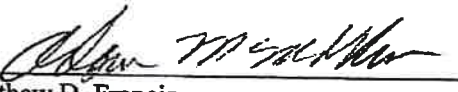
Aside Default Judgment. Attached as Exhibit 1 is a true and correct copy of such Order.

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: February 7, 2014.

WATSON ROUNDS

By: 
Matthew D. Francis
Adam P. McMillen
Watson Rounds
5371 Kietzke Lane
Reno, NV 89511
Attorneys for Plaintiff Jed Margolin

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CERTIFICATE OF SERVICE

Pursuant to NRC 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:

Johnathon Fayeghi, Esq.
Hawkins Melendrez
9555 Hillwood Dr., Suite 150
Las Vegas, NV 89134
Counsel for Reza Zandian

Optima Technology Corp.
A California corporation
8401 Bonita Downs Road
Fair Oaks, CA 95628

Optima Technology Corp.
A Nevada corporation
8401 Bonita Downs Road
Fair Oaks, CA 95628

Optima Technology Corp.
A California corporation
8775 Costa Verde Blvd. #501
San Diego, CA 92122

Optima Technology Corp.
A Nevada corporation
8775 Costa Verde Blvd. #501
San Diego, CA 92122

Dated: February 10th, 2014.

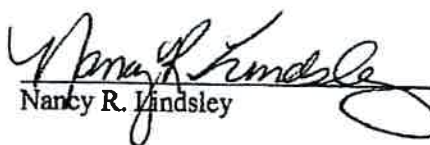

Nancy R. Lindsley

Exhibit 1

Exhibit 1

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Case No.: 09 OC 00579 1B

Dept. No.: 1

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ALAN GLOVER

BY CLERK
 DEPUTY

**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 DENYING DEFENDANT
REZA ZANDIAN AKA GOLAMREZA
ZANDIANJAZI AKA GHOLAM REZA
ZANDIAN AKA REZA JAZI AKA J.
REZA JAZI AKA G. REZA JAZI AKA
GHONONREZA ZANDIAN JAZI'S
MOTION TO SET ASIDE DEFAULT
JUDGMENT**

This matter comes before the Court on REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI's ("Zandian") Motion to Set Aside Default Judgment, dated December 19, 2013. Plaintiff Jed Margolin filed an Opposition to Set Aside Default Judgment on January 19, 2014. Zandian served a reply in support of the Motion to Set Aside on January 23, 2014. Based upon the following facts and conclusions of law, Zandian's Motion to Set Aside is DENIED.

\\

1 I. FACTUAL BACKGROUND

2 Plaintiff Jed Margolin is the named inventor on United States Patent No. 5,566,073
3 ("the '073 Patent"), United States Patent No. 5,904,724 ("the '724 Patent"), United States
4 Patent No. 5,978,488 ("the '488 Patent") and United States Patent No. 6,377,436 ("the '436
5 Patent") (collectively "the Patents"). See Amended Complaint, filed 8/11/11, ¶¶ 9-10. In
6 2004, Mr. Margolin granted to Robert Adams, then CEO of Optima Technology, Inc. (later
7 renamed Optima Technology Group (hereinafter "OTG"), a Cayman Islands Corporation
8 specializing in aerospace technology) a Power of Attorney regarding the Patents. *Id.* at ¶ 11.
9 Subsequently, Mr. Margolin assigned the '073 and '724 Patents to OTG and revoked the
10 Power of Attorney. *Id.* at ¶ 13.

11 In May 2006, OTG and Mr. Margolin licensed the '073 and '724 Patents to Geneva
12 Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to a royalty agreement
13 between Mr. Margolin and OTG. *Id.* at ¶ 12. On or about October 2007, OTG licensed the
14 '073 Patent to Honeywell International, Inc., and Mr. Margolin received a royalty payment
15 pursuant to a royalty agreement between Mr. Margolin and OTG. *Id.* at ¶ 14.

16 On or about December 5, 2007, Zandian filed with the U.S. Patent and Trademark
17 Office ("USPTO") assignment documents allegedly assigning all four of the Patents to Optima
18 Technology Corporation ("OTC"), a company apparently owned by Zandian at the time. *Id.* at
19 ¶ 15. Shortly thereafter, on November 9, 2007, Mr. Margolin, Robert Adams, and OTG were
20 named as defendants in the case titled *Universal Avionics Systems Corporation v. Optima
21 Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the "Arizona action"). *Id.* at ¶ 17.
22 Zandian was not a party in the Arizona action. Nevertheless, the plaintiff in the Arizona action
23 asserted that Mr. Margolin and OTG were not the owners of the '073 and '724 Patents, and
24 OTG filed a cross-claim for declaratory relief against Optima Technology Corporation
25 ("OTC") in order to obtain legal title to the respective patents. *Id.*

26 On August 18, 2008, the United States District Court for the District of Arizona
27 entered a default judgment against OTC and found that OTC had no interest in the '073 or
28 '724 Patents, and that the assignment documents filed with the USPTO were "forged, invalid,

1 void, of no force and effect.” *Id.* at ¶ 18; *see also* Exhibit B to Zandian’s Motion to Dismiss,
2 dated 11/16/11, on file herein.

3 Due to Zandian’s acts, title to the Patents was clouded and interfered with Plaintiff’s
4 and OTG’s ability to license the Patents. *Id.* at ¶ 19. In addition, during the period of time Mr.
5 Margolin worked to correct record title of the Patents in the Arizona action and with the
6 USPTO, he incurred significant litigation and other costs associated with those efforts. *Id.* at ¶
7 20.

8 II. PROCEDURAL BACKGROUND

9 Plaintiff filed his Complaint on December 11, 2009, and the Complaint was personally
10 served on Zandian on February 2, 2010, and on Defendants Optima Technology Corporation, a
11 Nevada corporation, and Optima Technology Corporation, a California corporation on March
12 21, 2010. Zandian’s answer to Plaintiff’s Complaint was due on February 22, 2010, but
13 Zandian did not answer the Complaint or respond in any way. Default was entered against
14 Zandian on December 2, 2010, and Plaintiff filed and served a Notice of Entry of Default on
15 Zandian on December 7, 2010 and on his last known attorney on December 16, 2010.

16 The answers of Defendants Optima Technology Corporation, a Nevada corporation,
17 and Optima Technology Corporation, a California corporation, were due on March 8, 2010,
18 but Defendants did not answer the Complaint or respond in any way. Default was entered
19 against Defendants Optima Technology Corporation, a Nevada corporation, and Optima
20 Technology Corporation, a California corporation on December 2, 2010. Plaintiff filed and
21 served a Notice of Entry of Default on the corporate entities on December 7, 2010 and on their
22 last known attorney on December 16, 2010.

23 The defaults were set aside and Zandian’s motion to dismiss was denied on August 3,
24 2011. On September 27, 2011, this Court ordered that service of process against all
25 Defendants may be made by publication. As manifested by the affidavits of service, filed
26 herein on November 7, 2011, all Defendants were duly served by publication by November
27 2011.

28

1 On February 21, 2012, the Court denied Zandian's motion to dismiss the Amended
2 Complaint. On March 5, 2012, Zandian served a General Denial to the Amended Complaint.
3 On March 13, 2012, the corporate Defendants served a General Denial to the Amended
4 Complaint.

5 On June 28, 2012, this Court issued an order requiring the corporate Defendants to
6 retain counsel and that counsel enter an appearance on behalf of the corporate Defendants by
7 July 15, 2012. The June 28, 2012 order further provided that if no such appearance was
8 entered, the corporate Defendants' General Denial would be stricken. Since no appearance
9 was their behalf of the corporate Defendants, a default was entered against them on September
10 24, 2012. A notice of entry of default judgment was filed and served on November 6, 2012.

11 On July 16, 2012, Mr. Margolin served Zandian with Mr. Margolin's First Set of
12 Requests for Admission, First Set of Interrogatories, and First Set of Requests for Production
13 of Documents, but Zandian never responded to these discovery requests. As such, on
14 December 14, 2012, Mr. Margolin filed and served a Motion for Sanctions pursuant to NRC
15 37. In this Motion, Mr. Margolin requested this Court strike the General Denial of Zandian,
16 and award Mr. Margolin his fees and costs incurred in bringing the Motion.

17 On January 15, 2013, this Court issued an order striking the General Denial of Zandian
18 and awarding his fees and costs incurred in bringing the NRC 37 Motion. A default was
19 entered against Zandian on March 28, 2013, and a notice of entry of default judgment was
20 filed and served on April 5, 2013.

21 On April 17, 2013, Mr. Margolin filed an Application for Default Judgment, which was
22 served on Zandian and the corporate Defendants. Since Zandian did not respond to the
23 Application for Default Judgment, a Default Judgment was entered on June 24, 2013. Notice
24 of entry of the Default Judgment was served on Zandian on June 26, 2013 and filed on June
25 27, 2013.

26 Over five and a half months later, on December 19, 2013, Zandian served his Motion
27 to Set Aside on Plaintiff. Zandian's Motion to Set Aside claims that he never received any
28 written discovery or notice of the pleadings and papers filed in this matter after his counsel

1 withdrew as his former counsel provided an erroneous last known address to the Court and the
2 parties when he withdrew, and therefore Zandian requests that the judgment be set aside.

3 III. FINDINGS AND CONCLUSIONS OF LAW

4 A party seeking to set aside a default judgment has the burden to prove mistake,
5 inadvertence, surprise, or excusable neglect by a preponderance of the evidence. *Kahn v.*
6 *Orme*, 108 Nev. 510, 513–14, 835 P.2d 790, 793 (1992). The Court finds that Zandian has not
7 met the burden to prove mistake, inadvertence, surprise, or excusable neglect by a
8 preponderance of the evidence.

9 Specifically, Zandian has not met the factors set forth in *Kahn* to compel the court to
10 set aside the judgment. *Id.* at 513, 835 P.2d at 792–93 (holding that the district court must
11 consider whether the party moving to set aside a judgment promptly applied to remove the
12 judgment, lacked intent to delay the proceedings, lacked knowledge of the procedural
13 requirements, and demonstrated good faith, in addition to considering the state's underlying
14 policy of resolving cases on the merits). Zandian failed to promptly apply for relief, has not
15 established a lack of intent to delay these proceedings or a lack of knowledge of the procedural
16 requirements, and did not provide a good-faith reason for the over five-and-a-half-month gap
17 between entry of default and the time he obtained new counsel and filed the Motion to Set
18 Aside Default Judgment.

19 a. Zandian Did Not Promptly Apply To Remove The Judgment

20 Even though a motion to set aside a judgment may be filed within the six month
21 deadline provided for in NRCP 60(b), a party can still fail to act promptly. *See Kahn* 108 Nev.
22 at 514, 835 P.2d at 793. Therefore, “want of diligence in seeking to set aside a judgment is
23 ground enough for denial of such a motion.” *Id.* (citing *Union Petrochemical Corp. v. Scott*,
24 96 Nev. 337, 339, 609 P.2d 323, 324 (1980) (citing *Lentz v. Boles*, 84 Nev. 197, 438 P.2d 254
25 (1968); *Hotel Last Frontier v. Frontier Prop.*, 79 Nev. 150, 380 P.2d 293 (1963)).

26 Despite his knowledge of the default judgment, Zandian did not move to have the
27 judgment set aside until nearly six months after its entry. Although Zandian argues he did not
28 receive notice of the various proceedings, notice was mailed to his address. Therefore, the

1 notice requirement of NRCP 55 was fulfilled as Plaintiff served written notice of the
2 application for default judgment. Moreover, NRCP 55 is likely not implicated since the
3 judgment ultimately resulted from sanctions arising from Zandian's failure to respond to
4 discovery. *See Durango Fire Protection, Inc. v. Troncoso*, 120 Nev. 658 (2004) (trial court's
5 entry of judgment for plaintiff, in action for breach of contract, after striking defendant's
6 answer was a sanction for defendant's failure to appear at several hearings and calendar calls
7 rather than a default judgment, and thus, civil procedure rule requiring written notice before
8 entry of default judgment was not applicable).

9 Further, First Judicial District Court Rule 22(3) expressly states that "[a]ny form of
10 order permitting withdrawal of an attorney submitted to the Court for signature shall contain
11 the address at which the party is to be served with notice of all further proceedings." Plaintiff
12 had a right to rely on the address given by Zandian's prior attorney.

13 No evidence supports Zandian's claims that he lacked knowledge of this matter. Even
14 if Zandian was living in France, for which no competent evidence has been provided to this
15 Court, Zandian was required to provide the Court and the parties with his new address.
16 However, Zandian never informed this Court or the parties of any address change. The record
17 demonstrates that the Plaintiff's discovery requests, motions, application for judgment, orders
18 and notice of judgment were all mailed to Zandian's address of record. Under NRCP 5(b),
19 service by mail is complete upon mailing. Thus, Zandian received notice of the proceedings
20 and his repeated failure to respond constituted inexcusable neglect.

21 **b. Zandian Has Failed To Show He Lacked Intent To Delay**

22 Zandian received all of the papers and pleadings in this matter. However, he failed to
23 respond to Plaintiff's discovery and willfully ignored the proceedings of this matter. In fact,
24 Zandian waited nearly six months to secure new counsel and file the motion to set aside.
25 Furthermore, Zandian failed to file an opposition to the application for judgment.
26 Accordingly, the Court finds that Zandian has failed to establish the absence of an intent to
27 delay.

28 **c. Whether Zandian Lacked Knowledge Of Procedural Requirements**

1 Zandian unquestionably had notice of the written discovery, motions and orders filed in
2 this matter, and yet he ignored all of these documents. All that was required of Zandian was to
3 either personally respond to the discovery and motions or obtain counsel to appear on his
4 behalf. Zandian knew discovery had been served but deliberately chose to ignore it. Zandian
5 knew a motion for sanctions and an application for judgment had been filed, which led to the
6 judgment, but Zandian chose to ignore those items as well. Zandian's failure to obtain new
7 counsel or otherwise act on his own behalf is inexcusable. See *Kahn* 108 Nev. at 514-15, 835
8 P.2d at 793-4. As the Nevada Supreme Court stated in *Kahn*:

9 we are not confronted here with some subtle or technical aspect of
10 procedure, ignorance of which could readily be excused. The requirements
11 of the rule are simple and direct. *To condone the actions of a party who has*
12 *sat on its rights only to make a last-minute rush to set aside judgment would*
be to turn NRC P 60(b) into a device for delay rather than the means for
relief from an oppressive judgment that it was intended to be.

13 *Id.* (citing *Union*, 96 Nev. at 339, 609 P.2d at 324 (citing *Franklin v. Bartsas Realty, Inc.*, 95
14 Nev. 559, 598 P.2d 1147 (1979); *Central Operating Co. v. Utility Workers of America*, 491
15 F.2d 245 (4th Cir.1974)) (emphasis added in original)).
16

17 Zandian had sufficient knowledge to act responsibly. He had previously retained
18 counsel to defend this action and retained new counsel to set aside the judgment. Therefore,
19 this Court cannot conclude that Zandian failed to respond to set aside the default judgment
20 because he was ignorant of procedural requirements.

21 **d. Whether Zandian Acted In Good Faith**

22 Zandian has not provided any valid reason for failing to respond to the requested
23 discovery, the motion for sanctions or the application for judgment. Furthermore, he has not
24 provided a reasonable explanation for waiting over five months to obtain other counsel despite
25 having knowledge of the judgment entered against him.
26

27 Based upon the fact that Zandian knew about this case and continued to receive the
28 papers and pleadings from this matter, it was inexcusable for Zandian not to respond to the

1 earlier discovery requests and motions. Zandian has not demonstrated good faith. In fact,
2 Zandian has only demonstrated inexcusable neglect by his willful failure to respond to, and
3 participate in, this action. Accordingly, the Court determines that Zandian lacked good faith in
4 contesting this action.

5 **e. Whether This Case Should Be Tried On The Merits For Policy Reasons**

6 The Nevada Supreme Court has held that “good public policy dictates that cases be
7 adjudicated on their merits.” *See Kahn* 108 Nev. at 516, 835 P.2d at 794 (citing *Hotel Last*
8 *Frontier v. Frontier Prop.*, 79 Nev. 150, 155–56, 380 P.2d 293, 295 (1963) (original
9 emphasis). However, this policy has its limits:
10

11 We wish not to be understood, however, that this judicial tendency to grant
12 relief from a default judgment implies that the trial court should always
13 grant relief from a default judgment. Litigants and their counsel may not
14 properly be allowed to disregard process or procedural rules with impunity.
15 Lack of good faith or diligence, or lack of merit in the proposed defense,
16 may very well warrant a denial of the motion for relief from the judgment.

17 *Id.* (citing *Lentz v. Boles*, 84 Nev. 197, 200, 438 P.2d at 256 (1968)).

18 Zandian has disregarded the process and procedural rules of this matter with impunity.
19 He has repeatedly ignored this matter and failed to respond to the written discovery and
20 motions in this matter since his former attorney John Peter Lee withdrew from representation.
21 Zandian’s lack of good faith or diligence warrants a denial of the motion to set aside.

22 Zandian’s complete failure to respond to the discovery requests and subsequent
23 motions evidences his willful and recalcitrant disregard of the judicial process, which
24 prejudiced Plaintiff. *Foster v. Dingwall*, 227 P.3d 1042, 1049 (Nev. 2010) (citing *Hamlett v.*
25 *Reynolds*, 114 Nev. 863, 865, 963 P.2d 457, 458 (1998) (upholding the district court’s strike
26 order where the defaulting party’s “constant failure to follow [the court’s] orders was
27 unexplained and unwarranted”); *In re Phenylpropanolamine (PPA) Products*, 460 F.3d 1217,
28 1236 (9th Cir.2006) (holding that, with respect to discovery abuses, “[p]rejudice from
unreasonable delay is presumed” and failure to comply with court orders mandating discovery
“is sufficient prejudice”)).


1 In light of Zandian's repeated and continued abuses, the policy of adjudicating cases on
2 the merits would not be furthered in this case, and the ultimate sanctions are necessary to
3 demonstrate to Zandian and future litigants that they are not free to act with wayward
4 disregard of a court's orders. *Foster*, 227 P.3d at 1049. Moreover, Zandian's failure to oppose
5 Plaintiff's motion to strike the General Denial or the application for judgment constitutes an
6 admission that the motion and application were meritorious. *Id.* (citing *King v. Carlidge*, 121
7 Nev. 926, 927, 124 P.3d 1161, 1162 (2005) (stating that an unopposed motion may be
8 considered as an admission of merit and consent to grant the motion) (citing DCR 13(3)).

9 **IV. CONCLUSION**

10 The record provides substantial evidence to support this denial of Zandian's motion to
11 set aside. Further, the policy of resolving cases on the merits does not allow litigants "to
12 disregard process or procedural rules with impunity." *Kahn*, 108 Nev. at 516, 835 P.2d at 794
13 (quoting *Lentz v. Boles*, 84 Nev. 197, 200, 438 P.2d 254, 256-57 (1968)).

14 Zandian has failed to show mistake, inadvertence, surprise or excusable neglect
15 pursuant to NRCP 60(b). Zandian had every opportunity to properly defend this action and
16 instead made a voluntary choice not to. Therefore, Zandian's motion to set aside is hereby
17 DENIED.

18 DATED: This 6th day of February, 2014. IT IS SO ORDERED:
19


20
21 
22 JAMES T. RUSSELL
23 DISTRICT COURT JUDGE
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1 CERTIFICATE OF MAILING

2 I hereby certify that on the 6 day of February, 2014, I placed a copy of the
3 foregoing in the United States Mail, postage prepaid, addressed as follows:

4 Matthew D. Francis
5 Adam P. McMillen
6 Watson Rounds
7 5371 Kietzke Lane
8 Reno, NV 89511


9 Geoffrey W. Hawkins
10 Johnathon Fayeghi
11 Hawkins Melendrez, P.C.
12 9555 Hillwood Drive, Suite 150
13 Las Vegas, NV 89134

14 
15 Samantha Valerius
16 Law Clerk, Department I
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FILED

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1 JASON D. WOODBURY
Nevada Bar No. 6870
2 KAEMPFER CROWELL
510 West Fourth Street
3 Carson City, Nevada 89703
Telephone: (775) 884-8300
4 Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com
5 **Attorneys for Reza Zandian**

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2014 MAR 12 PM 3:54
ALAN GLOVER
BY  CLERK
DEPUTY

6 IN THE FIRST JUDICIAL DISTRICT COURT
7 OF THE STATE OF NEVADA IN AND FOR
8 CARSON CITY

9 JED MARGOLIN, an individual,
10 Plaintiff,

11 vs.

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

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

19
20 **NOTICE OF APPEAL**

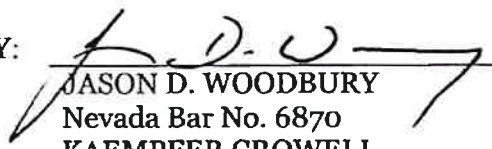
21 Notice is hereby given that REZA ZANDIAN, a Defendant above-named, hereby
22 appeals to the Supreme Court of Nevada from the *Order Denying Defendant Reza*
23 *Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J.*
24 *Reza Jazi aka G. Reza Jazi aka Ghonoreza Zandian Jazi's Motion to Set Aside Default*
Judgment entered in this action on the 6th day of February, 2014. A *Notice of Entry of*

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 Order was served by mail upon counsel for Reza Zandian on February 10, 2014, a true
2 and correct copy of which is attached to this *Notice of Appeal* as Exhibit 1. A cash
3 deposit in the amount of \$500.00 has been submitted herewith as evidenced by the
4 *Notice of Cash Deposit in Lieu of Bond* filed contemporaneously herewith.

5 DATED this 12th day of March, 2014.

6 KAEMPFER CROWELL

7
8 BY: 
9 JASON D. WOODBURY
10 Nevada Bar No. 6870
11 KAEMPFER CROWELL
12 510 West Fourth Street
13 Carson City, Nevada 89703
14 Telephone: (775) 884-8300
15 Facsimile: (775) 882-0257
16 jwoodbury@kcnvlaw.com
17 ***Attorneys for Reza Zandian***

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KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

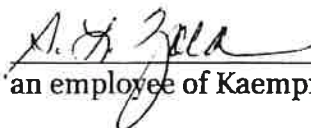
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25(d) and NRCP 5(b), I hereby certify that service of the
3 foregoing **NOTICE OF APPEAL** was made this date by depositing a true copy of the
4 same for mailing at Carson City, Nevada, first class postage pre-paid, addressed to each
5 of the following:

6 Matthew D. Francis
7 Adam P. McMillen
8 WATSON ROUNDS
9 5371 Kietzke Lane
10 Reno, NV 89511

11 DATED this 12th day of March, 2014.

12 
13 _____
14 an employee of Kaempfer Crowell

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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 GHONOREZA ZANDIAN JAZI, an individual,
DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,
Defendants.**

First Judicial District Court of the State of Nevada in and for Carson City

Case No. 09 OC 00579 1B

Dept. No. I

NOTICE OF APPEAL


Exhibit List

Exhibit No.	Description of Exhibit	Exhibit Pages
1	Notice of Entry of Order (Feb. 6, 2014)	14

EXHIBIT 1

EXHIBIT 1

1 JASON D. WOODBURY
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2 KAEMPFER CROWELL
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jwoodbury@kcnvlaw.com
5 **Attorneys for Reza Zandian**

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2014 MAR 12 PM 3:54
ALAN GLOVER
BY  CLERK
DEPUTY

6 IN THE FIRST JUDICIAL DISTRICT COURT
7 OF THE STATE OF NEVADA IN AND FOR
8 CARSON CITY

9 JED MARGOLIN, an individual,

10 Plaintiff,

11 vs.

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

18 Defendants.

Case No. 09 OC 00579 1B

Dept. No. I

19
20 **NOTICE OF APPEAL**

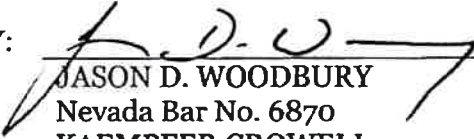
21 Notice is hereby given that REZA ZANDIAN, a Defendant above-named, hereby
22 appeals to the Supreme Court of Nevada from the *Order Denying Defendant Reza*
23 *Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J.*
24 *Reza Jazi aka G. Reza Jazi aka Ghonoreza Zandian Jazi's Motion to Set Aside Default*
Judgment entered in this action on the 6th day of February, 2014. A *Notice of Entry of*

1 Order was served by mail upon counsel for Reza Zandian on February 10, 2014, a true
2 and correct copy of which is attached to this *Notice of Appeal* as Exhibit 1. A cash
3 deposit in the amount of \$500.00 has been submitted herewith as evidenced by the
4 *Notice of Cash Deposit in Lieu of Bond* filed contemporaneously herewith.

5 DATED this 12th day of March, 2014.

6 KAEMPFER CROWELL

7
8 BY:



JASON D. WOODBURY
Nevada Bar No. 6870
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703
Telephone: (775) 884-8300
Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com
Attorneys for Reza Zandian

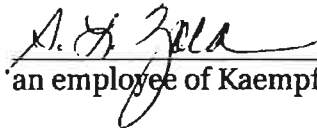
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KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25(d) and NRCP 5(b), I hereby certify that service of the
3 foregoing **NOTICE OF APPEAL** was made this date by depositing a true copy of the
4 same for mailing at Carson City, Nevada, first class postage pre-paid, addressed to each
5 of the following:

6 Matthew D. Francis
7 Adam P. McMillen
8 WATSON ROUNDS
9 5371 Kietzke Lane
10 Reno, NV 89511

11 DATED this 12th day of March, 2014.

12 
13 _____
14 an employee of Kaempfer Crowell

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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 GHONOREZA ZANDIAN JAZI, an individual,
DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,**

Defendants.

First Judicial District Court of the State of Nevada in and for Carson City

Case No. 09 OC 00579 1B

Dept. No. I

NOTICE OF APPEAL

Exhibit List

Exhibit No.	Description of Exhibit	Exhibit Pages
1	Notice of Entry of Order (Feb. 6, 2014)	14

EXHIBIT 1

EXHIBIT 1

1 JASON D. WOODBURY
Nevada Bar No. 6870
2 KAEMPFER CROWELL
510 West Fourth Street
3 Carson City, Nevada 89703
Telephone: (775) 884-8300
4 Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com
5 **Attorneys for Reza Zandian**

REC'D & FILED

2014 MAR 12 PM 3:54

ALAN GLOVER
BY Alan Glover CLERK
DEPUTY

6 IN THE FIRST JUDICIAL DISTRICT COURT
7 OF THE STATE OF NEVADA IN AND FOR
8 CARSON CITY

9 JED MARGOLIN, an individual,
10 Plaintiff,

11 vs.

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

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

19
20 **CASE APPEAL STATEMENT**

21 Pursuant to NRAP 3(f), Defendant REZA ZANDIAN, an individual, hereby
22 provides the following *Case Appeal Statement*:

- 23 1. Name of appellant filing this case appeal statement (NRAP
24 3(f)(3)(C)):
REZA ZANDIAN, an individual.

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

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2. **Identify the judge issuing the decision, judgment, or order appealed from (NRAP 3(f)(3)(B)):**

The Honorable James T. Russell, District Judge, First Judicial District Court of the State of Nevada in and for Carson City, Department I.

3. **Identify all parties to the proceedings in the district court (the use of et al. to denote parties is prohibited) (NRAP 3(f)(3)(A)):**

- (a) JED MARGOLIN, an individual;
- (b) OPTIMA TECHNOLOGY CORPORATION, a California corporation;
- (c) OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation; and
- (d) REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONOREZA ZANDIAN JAZI, an individual;

4. **Identify all parties involved in this appeal (the use of et al. to denote parties is prohibited) (NRAP 3(f)(3)((C), (D)):**

- (a) JED MARGOLIN, an individual; and
- (b) REZA ZANDIAN, an individual.

5. **Set forth the name, law firm, address, and telephone number of all counsel on appeal and identify the party or parties whom they represent (NRAP 3(f)(3)(C), (D)):**

- (a) Matthew D. Francis
Adam P. McMillen
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511
Telephone: (775) 324-4100
Counsel for Respondent, JED MARGOLIN

(b) Jason D. Woodbury
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703
Telephone: (775) 884-8300
Counsel for Appellant, REZA ZANDIAN

6. Indicate whether appellant was represented by appointed or retained counsel in the district court (NRAP 3(f)(3)(F)):

Appellant was represented by retained counsel in district court.

7. Indicate whether appellant is represented by appointed or retained counsel on appeal (NRAP 3(f)(3)(F)):

Appellant is represented by retained counsel on appeal.

8. Indicate whether appellant was granted leave to proceed in forma pauperis, and the date of entry of the district court order granting such leave (NRAP 3(f)(3)(G)):

Appellant was not granted leave to proceed in forma pauperis.

9. Indicate the date of the proceedings commenced in the district court (e.g., date complaint, indictment, information, or petition was filed) (NRAP 3(f)(3)(H)):

Respondent's *Complaint* was filed in the District Court on December 11, 2009.

10. District court case number and caption showing the names of all parties to the proceedings below, but the use of et al. to denote parties is prohibited (NRAP 3(f)(3)(A)):

(a) Case number:

First Judicial District Court Case Number: 09 OC 00579 1B
Department Number: I

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(b) Caption:

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 GHONOREZA ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,

Defendants.

11. Whether any of respondents' attorneys are not licensed to practice law in Nevada, and, if so, whether the district court granted that attorney permission to appear under SCR 42, including a copy of any district court order granting that permission (NRAP 3(f)(3)(E)):

Based upon information and belief, all attorneys for respondents are licensed to practice law in Nevada.

12. Brief description of the nature of the action and result in district court, including the type of judgment or order being appealed and the relief granted by the district court (NRAP 3(f)(3)(I)):

The subject matter of this case concerns various patents and a dispute over their ownership. Plaintiff claims to be the owner of the patents at issue. Plaintiff claims that certain conduct and actions of Optima Technology Corporation, a California corporation, Optima Technology Corporation, a Nevada corporation, (together these

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corporations are referred to hereinafter as the “Corporate Defendants”) and Reza Zandian (“Zandian”) (collectively the Corporate Defendants and Zandian are referred to as the “Defendants”) disrupted his ownership and control over the patents, thereby causing him damages. Specifically, Plaintiff’s *Complaint* alleged the following claims against the Defendants: (1) Conversion; (2) Tortious Interference with Contract; (3) Intentional Interference with Prospective Economic Advantage; (4) Unjust Enrichment; and (5) Unfair and Deceptive Trade Practices.

On September 9, 2011, the District Court issued an order authorizing service of Plaintiff’s *Amended Complaint*¹ by publication.² Service by publication was accomplished on November 7, 2011. The Defendants answered in March, 2012. On July 16, 2012, Plaintiff served Zandian with several discovery requests. When there was no response to the discovery requests, the District Court granted Plaintiff’s request for sanctions and struck Zandian’s answer on January 15, 2013.

On March 28, 2013, the District Court entered a Default against Zandian. Later, pursuant to the application of Plaintiff, the District Court entered a Default Judgment against the Defendants in the amount of \$1,495,775.74. Plaintiff filed a *Notice of Entry of Default Judgment* on June 27, 2013.

On December 20, 2013, Zandian filed a *Motion to Set Aside Default Judgment* with the District Court. Plaintiff filed a response, and Zandian replied. No hearing was held on the *Motion to Set Aside*. On February 6,

¹ Plaintiff filed his *Amended Complaint* on August 11, 2011.

1 2014, the District Court entered its *Order Denying Defendant Reza*
2 *Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka*
3 *Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghonoreza Zandian*
4 *Jazi's Motion to Set Aside Default Judgment*. And on February 10, 2014,
5 Plaintiff served notice by mail that this Order had been entered.

6 **13. Whether the case has previously been the subject of an appeal to**
7 **or original writ proceeding in the Supreme Court and, if so, the**
8 **caption and Supreme Court docket number of the prior**
9 **proceeding (NRAP 3(f)(J)):**

10 Upon information and belief, this case has not previously been the
11 subject of an appeal to or original writ proceeding in the Supreme Court.

12 **14. Whether the appeal involves child custody or visitation (NRAP**
13 **3(f)(3)(K)):**

14 The appeal does not involve child custody or visitation.

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KASPER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

² There were proceedings which occurred prior to the issuance of the District Court's order allowing service by publication. However, they are not pertinent for purposes of the *Case Appeal Statement*.

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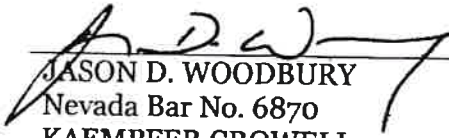
15. In civil cases, whether the appeal involves the possibility of settlement (NRAP 3(f)(3)(L)):

The appeal involves the possibility of settlement.

DATED this 12th day of March, 2014.

KAEMPFER CROWELL

BY:



JASON D. WOODBURY
Nevada Bar No. 6870
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703
Telephone: (775) 884-8300
Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com
Attorneys for Reza Zandian

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25(d) and NRCP 5(b), I hereby certify that service of the
3 foregoing **CASE APPEAL STATEMENT** was made this date by depositing for mailing
4 of the same in Portable Document Format addressed to each of the following:

5 Matthew D. Francis
6 Adam P. McMillen
7 WATSON ROUNDS
8 5371 Kietzke Lane
9 Reno, NV 89511

10 DATED this 12th day of March, 2014.

11 
12 _____
13 an employee of Kaempfer Crowell
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1 JASON D. WOODBURY
Nevada Bar No. 6870
2 KAEMPFER CROWELL
510 West Fourth Street
3 Carson City, Nevada 89703
Telephone: (775) 884-8300
4 Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com
5 **Attorneys for Reza Zandian**

REC'D & FILED

2014 MAR 12 PM 3:54

ALAN GLOVER
BY  CLERK
DEPUTY

6 IN THE FIRST JUDICIAL DISTRICT COURT
7 OF THE STATE OF NEVADA IN AND FOR
8 CARSON CITY

9 JED MARGOLIN, an individual,

10 Plaintiff,

11 vs.

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

18 Defendants.

Case No. 09 OC 00579 1B

Dept. No. I

19
20 **NOTICE OF CASH DEPOSIT IN LIEU OF BOND**

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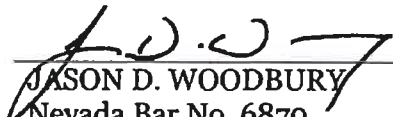
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

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Notice is hereby given that Defendant above-named, REZA ZANDIAN, an individual, has deposited \$500.00 in lieu of a bond with the First Judicial District Court of the State of Nevada in and for Carson City pursuant to the requirements of NRAP 7.

DATED this 12th day of March, 2014.

KAEMPFER CROWELL

BY: 

JASON D. WOODBURY
Nevada Bar No. 6870
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703
Telephone: (775) 884-8300
Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com
Attorneys for Reza Zandian

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1586

1 CERTIFICATE OF SERVICE

2 Pursuant to NRAP 25(d) and NRCP 5(b), I hereby certify that service of the
3 foregoing NOTICE OF CASH DEPOSIT IN LIEU OF BOND was made this date by
4 depositing a true copy of the same for mailing at Carson City, Nevada, first class postage
5 pre-paid, addressed to each of the following:

6 Matthew D. Francis
7 Adam P. McMillen
8 WATSON ROUNDS
9 5371 Kietzke Lane
10 Reno, NV 89511

11 DATED this 12th day of March, 2014.

12 
13 an employee of Kaempfer Crowell
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1 Matthew D. Francis (6978)
Adam P. McMillen (10678)
2 WATSON ROUNDS
3 5371 Kietzke Lane
Reno, NV 89511
4 Telephone: 775-324-4100
Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

REC'D & FILED ✓
2014 MAR 13 PM 3:42
ALAN GLOVER
CLERK
BY *[Signature]*
DEPUTY

6
7 **In The First Judicial District Court of the State of Nevada**
8 **In and for Carson City**

10 **JED MARGOLIN, an individual,**
11 **Plaintiff,**

Case No.: 090C00579 1B
Dept. No.: 1

12 **vs.**

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

REPLY IN SUPPORT OF MOTION
FOR ORDER TO SHOW CAUSE
REGARDING CONTEMPT

21 Plaintiff Jed Margolin submits the following reply arguments in support of
22 Motion for Order to Show Cause Regarding Contempt:

23
24 **I. Zandian Consented To The Granting Of The Motion For Judgment**
Debtor Examination Under NRS 21.270

25 Zandian's failure to file an opposition to the Motion for Judgment Debtor Examination
26 constituted a consent to the granting of the Motion. See FJDCR 15(5) ("a failure of an
27 opposing party to file a memorandum of points and authorities in opposition to any motion
28 within the time permitted shall constitute a consent to the granting of the motion.") (emphasis

1598

1 added); *see also* FJDCR 30 (“If a party or an attorney fails, refuses, or neglects to comply with
2 these rules, the Nevada Rules of Civil Procedure, the District Court Rules, the Supreme Court
3 Rules, or any statutory requirements, the Court may, after notice and an opportunity to be
4 heard, impose any and all sanctions authorized by statute or rule[.]”).

5 Zandian openly recognizes he did not oppose the Motion for Judgment Debtor
6 Examination and he should have raised the issues he now raises in an opposition to the Motion
7 for Judgment Debtor’s Examination, not the Motion for contempt sanctions. *See* Opposition to
8 Motion for Order to Show Cause Regarding Contempt (“Opposition”), dated 3/3/14, p. 6, n. 9
9 (“To be fair, the fact that the *Motion for Judgment Debtor Examination and to Produce*
10 *Documents* was unopposed by then-counsel for Reza Zandian bears a fair share of the
11 responsibility for the oversight.”); *see also id.* at p. 8, n. 13 (“Again, it must be conceded that it
12 would have been far better to present this position in the context of an opposition to the *Motion*
13 *for Judgment Debtor Examination and to Produce Documents*.”). Not only did Zandian fail to
14 oppose the Motion for Judgment Debtor Examination, he willfully failed to comply with the
15 resulting order.

16 But for Plaintiff’s counsel’s proactive approach, Zandian would have allowed Plaintiff
17 and the Court go forward with the debtor’s examination, knowing full well he was not going to
18 appear for the examination. It was not until Plaintiff’s counsel contacted Zandian’s counsel
19 that Plaintiff learned Zandian had no intention of complying with the Court’s order. *See*
20 Motion for Order to Show Cause Regarding Contempt, dated 2/12/14, Exhibit 2.

21 By failing to oppose the Motion for Judgment Debtor Examination, Zandian waived
22 the arguments he now makes regarding the validity of the order for Zandian to appear in
23 Carson City for a debtor’s examination and contempt sanctions are proper for his willful
24 disobedience.

25 **II. Zandian Has Still Not Produced Any Records And Should Be Held In**
26 **Contempt**

27 Seeking to further excuse himself, Zandian argues he should have been given 30 days
28 to comply with the order to produce records, pursuant to NRCPC 34. Zandian also argues there

1 was no reason to shorten the time to produce records below the 30 day requirement of NRCP
2 34.

3 However, Zandian admits the "*Order for Debtor's Examination*, insofar as it required
4 the production of documents by Reza Zandian, is sound." See Opposition at 7:15-17; see also
5 Opposition at 8:8-9 ("Of course, this Court has the authority to compel a shorter [time] or
6 allow a longer time than 30 days to produce documents in accordance with NRCP 34."); see
7 also NRCP 26(b)(2) ("By order, the court may alter the limits in these rules"); NRCP 34(b)
8 ("A shorter or longer time may be directed by the court").
9

10 Even though Zandian admits the order to produce the documents was sound and well
11 within the Court's power, Zandian willfully disobeyed the order and did not produce the
12 documents by February 4, 2014. In addition, even if we were to believe Zandian's argument
13 that he needed the standard 30 days to comply with the order, it has been well over 30 days
14 since the order was served on Zandian *and Zandian still has not produced any documents*
15 *pursuant to the order.*¹ Zandian has made no attempt to comply with the order. As such, the
16 circumstances warrant a determination that Zandian is in contempt of this Court's order and
17 sanctions should be imposed.
18

19 III. NRS 21.270(3) Also Provides Contempt Power

20 Zandian fails to recognize that NRS 21.270(3) provides authority for contempt
21 sanctions as follows: "A judgment debtor who is regularly served with an order issued
22 pursuant to this section, and who fails to appear at the time and place specified in the order,
23 may be punished for contempt by the judge issuing the order."
24

25 As Zandian failed to oppose the Motion, Zandian consented to the granting of the
26 Motion for Judgment Debtor's Examination in Carson City, and the Court certainly had the
27

28 ¹ Zandian argues that Plaintiff served the notice of entry of the Order for Debtor Examination by regular mail on
January 16, 2014. However, Plaintiff also served the notice by email on January 16, 2014. See Exhibit 1.

1 power to compel the production of documents and Zandian admits that order is sound. Since
2 Zandian was regularly served with an order to produce documents and appear at a debtor's
3 examination pursuant to NRS 21.270, and Zandian failed to produce documents and appear at
4 the time and place specified in the order, he may be punished for contempt.

5 **IV. The Court Has The Express And Inherent Power To Sanction Zandian**

6 Zandian argues that NRCP 69(a) requires any discovery techniques that are used in aid
7 of execution of the judgment must be used in accordance with the Nevada Rules of Civil
8 Procedure. See Opposition at 7:9-20. As a result, the Court also has the express authority to
9 issue sanctions under the state's discovery rules. Accordingly, "NRCP 37(b)(2) authorizes as
10 discovery sanctions dismissal of a complaint, entry of default judgment, and awards of fees
11 and costs. Generally, NRCP 37 authorizes discovery sanctions only if there has been willful
12 noncompliance with a discovery order of the court." *Young v. Johnny Ribeiro Bldg., Inc.*, 106
13 Nev. 88, 92, 787 P.2d 777, 779 (1990) (citing *Fire Insurance Exchange v. Zenith Radio Corp.*,
14 103 Nev. 648, 651, 747 P.2d 911, 913 (1987)).

15
16 In addition, courts have inherent equitable powers that permit sanctions for discovery
17 and other litigation abuses not specifically proscribed by statute. *Young*, 106 Nev. 88, 92, 787
18 P.2d 777, 779 ("courts have 'inherent equitable powers to dismiss actions or enter default
19 judgments for ... abusive litigation practices'" and "[I]itigants and attorneys alike should be
20 aware that these powers may permit sanctions for discovery and other litigation abuses not
21 specifically proscribed by statute.") (citations omitted); see also *Bahena v. Goodyear Tire &*
22 *Rubber Co.*, 126 Nev. Adv. Op. 26, 235 P.3d 592, 600 (2010) ("In addition to awarding
23 sanctions pursuant to NRCP 37(b)(2)(C), and based upon its inherent equitable power, the
24 district court may order sanctions under NRCP 37(d). NRCP 37(d) allows for the award of
25 sanctions if a party fails to attend their own deposition or fails to serve answers to
26 interrogatories or fails to respond to requests for production of documents."); see also Motion
27
28

1 for Order to Show Cause Regarding Contempt, dated 2/12/14, 7:16-8:18 (providing legal
2 authorities regarding Court's authority to issue contempt sanctions).

3 Under the Court's express and inherent power to govern these proceedings, the Court
4 has the authority and power to sanction Zandian for not responding to the Motion for
5 Judgment Debtor Examination, for not providing actual evidence regarding where Zandian is
6 actually residing, and for willfully disobeying the order granting Plaintiff's Motion for
7 Judgment Debtor Examination and to Produce Documents.

8 **V. It Does Matter Where Zandian Resides**

9
10 It is not sufficient for Zandian's latest Counsel to say "it does not matter where Mr.
11 Zandian resides, so long as it is not in Carson City, Nevada." See Opposition at p. 3, n. 2. To
12 the contrary, it does matter where Zandian resides. He has failed to provide any evidence to
13 show where Zandian did or does reside. The negative argument is not evidence.

14 As is well known to this Court, Zandian has, through a string of different attorneys,
15 continuously evaded the Plaintiff and this Court with regards to, among other things, services
16 of process, responding to discovery, responding to motions, and now in execution of the
17 judgment.

18
19 Zandian argues he resides in France. He appears to have his own self-serving
20 definition of the word, "reside," which is, "I reside wherever I say I reside." However, there is
21 overwhelming evidence that Zandian is and has been residing in the U.S. at all relevant times.
22 See Opposition to Motion to Set Aside Judgment, dated 1/9/14, 2:1-4:4 and Exhibits 1-12.
23 Zandian has done nothing to dispute the actual evidence provided to this Court.

24 In addition, Zandian owns property and business interests throughout the state of
25 Nevada. See Opposition to Motion to Dismiss, dated 12/5/11, 11:1-13:3 and Exhibits 5-25.
26 As a result of his extensive property and business interests, it might be well within the Court's
27

28

1 power to consider Zandian a resident of Carson City, especially since Zandian has purposely
2 evaded the Plaintiff and the Court at every turn.

3 Further, if Zandian had opposed the Motion for Judgment Debtor Examination and to
4 Produce Documents, he might have argued that he did not reside in Carson City. Then he
5 would have had to say where he was residing (with some credible evidence). If, for example,
6 Zandian was residing in Clark County, the Debtor's Examination could have been scheduled
7 to be held in the Las Vegas office of Watson Rounds. Zandian did not do that. Instead, he is
8 hiding from Plaintiff and from this Court.

9
10 **VI. Zandian Has Failed To Share His Side To The Story**

11 Zandian dismisses out of hand the factual and procedural background to this matter, as
12 follows:

13 Although only a select few facts are relevant to the actual issue before the
14 Court, Plaintiffs Motion offers several pages of "background", most of which is
15 obviously designed to engender bad will and disdain for Mr. Zandian. *Motion* at
16 3:20 - 7:15. This *Opposition* will make no effort - because none is called for - to
17 refute material which is immaterial to the question of whether this Court should
18 issue the requested order. Suffice it to say, for now, that there are two sides to
19 this story.

20 See *Opposition* at p. 3, n. 1 (emphasis added). The central fact of this case is that Zandian has
21 never denied fraudulently using a Power-of-Attorney in the patent assignment documents he
22 filed with the U.S. Patent Office. Zandian has had many chances to tell his side of the story but
23 has always refused to do so.

24 Zandian had a chance to tell his side of the story in the case held in U.S. District Court
25 for the District of Arizona (*Universal Avionics Systems Corporation v. Optima Technology
26 Group, et al.*) where the ownership of the Patents was a major issue. Zandian remained silent
27 in that case.

28 Zandian had a chance to tell his side of the story in the present case many times. After
Zandian was served with the Complaint, Zandian ignored the case and a default judgment was
entered against him. Later, John Peter Lee made an appearance for Zandian and moved to
dismiss the case, saying that Zandian had not been properly served and that this Court did not

1 have jurisdiction over Zandian because he lived in California. He had a chance to tell his side
2 of the story then, but chose not to.

3 Zandian had a chance to tell his story after he had been served by publication (made
4 necessary because John Peter Lee refused to accept service for Zandian and refused to provide
5 Zandian's address). However, Zandian again moved to dismiss the case where he again said
6 Zandian had not been properly served and that this Court did not have jurisdiction over
7 Zandian. Again, the motion to dismiss was denied. Zandian had a chance to tell his side of the
8 story when he finally did answer the Complaint. However his answer was only a General
9 Denial and did not contain any Affirmative Defenses. Again, he failed to tell his side of the
10 story.

11 Zandian had a chance to tell his side of the story after John Peter Lee withdrew as
12 counsel when Plaintiff sent the First Set of Requests for Admission, the First Set of
13 Interrogatories, and the First Set of Requests for Production of Documents to Zandian at the
14 address John Peter Lee provided to the Court in the motion to withdraw. One of the reasons
15 for sending Zandian the written discovery was to find out what Zandian's story was. He
16 ignored the discovery requests and did not respond.

17 The inescapable conclusion is that whatever story Zandian has to tell does not do him
18 any credit. Otherwise he would have told it by now.

19 **VII. CONCLUSION**

20 For all of the foregoing reasons, this Court should grant Plaintiff's Motion for Order to
21 Show Cause Regarding Contempt.


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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 this 13th day of March, 2014.

BY: 
Matthew D. Francis (6978)
Adam P. McMillen (10678)
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

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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, **REPLY IN SUPPORT OF MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT**, addressed as follows:

Jason D. Woodbury
Severin A. Carlson
Kaempfer Crowell
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Defendant, Reza Zandian

Dated: March 13, 2014


Nancy Lindsley

INDEX OF EXHIBITS

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Exhibit No.	Title	Number of Pages
1	Email, dated 1/16/14, from Nancy Lindsley to Lauren Kidd regarding Notice of Entry of Order Granting Debtor's Examination and to Produce Documents.	1

Exhibit 1

Exhibit 1

Adam McMillen

From: Nancy Lindsley
Sent: Thursday, January 16, 2014 3:16 PM
To: 'Lauren Kidd'
Subject: Margolin v. Zandian, et al.
Attachments: 2014-0113 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents.pdf; 2014-0116 Notice of Entry of Order Granting Debtor Examination.pdf

Dear Ms. Kidd:

Attached please find courtesy copies of documents which have been filed in connection with the above-referenced matter. Please contact us if you have any questions.

Sincerely,

Nancy R. Lindsley
Paralegal to
Matthew D. Francis and
Adam P. McMillen



5371 Kietzke Lane
Reno, NV 89511

Telephone: (775) 324-4100
Facsimile: (775) 333-8171
nlindsley@watsonrounds.com

STATEMENT OF CONFIDENTIALITY: This message contains information which may be confidential and privileged. Unless you are the addressee or authorized to receive emails for the addressee you may not use, copy or disclose to anyone this message or any information contained in this message. If you have received this message in error please advise the sender by reply email and then delete the entire email. IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by U.S. Treasury Regulation Circular 230, we inform you that any U.S. federal tax advice contained in this communication, including any attachments, is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting marketing or recommending to another party any transaction or matter addressed herein.

1 Matthew D. Francis (6978)
2 Adam P. McMillen (10678)
3 WATSON ROUNDS
4 5371 Kietzke Lane
5 Reno, NV 89511
6 Telephone: 775-324-4100
7 Facsimile: 775-333-8171
8 *Attorneys for Plaintiff Jed Margolin*

REC'D & FILED

2014 MAR 13 PM 3:42

ALAN GLOVER
CLERK
BY *[Signature]*
DEPUTY

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**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.

Case No.: 090C00579 1B

Dept. No.: 1

REQUEST FOR SUBMISSION

Plaintiff through his counsel respectfully requests the following documents be submitted to the Court for decision:

- 1) Motion for Order to Show Cause Regarding Contempt, filed February 12, 2014;
- 2) Opposition to Motion for Order to Show Cause Regarding Contempt, dated March 3, 2014; and,
- 3) Reply in Support of Motion for Order to Show Cause Regarding Contempt, filed March 13, 2014.


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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: March 13, 2014.

WATSON ROUNDS

BY: 

Matthew D. Francis (6978)
Adam P. McMillen (10678)
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

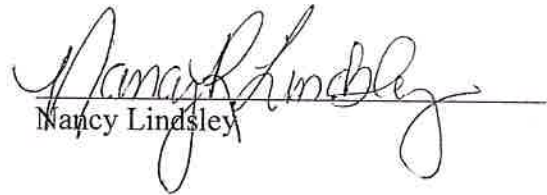
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CERTIFICATE OF SERVICE

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, **REQUEST FOR SUBMISSION**, addressed as follows:

Jason D. Woodbury
Severin A. Carlson
Kaempfer Crowell
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Defendant, Reza Zandian

Dated: March 13, 2014


Nancy Lindsley

REC'D & FILED

2014 MAR 17 PM 1:22

ALAN GLOVER

BY  CLERK
DEPUTY

1 Case No.: 09 OC 00579 1B

2 Dept. No.: 1

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6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR CARSON CITY
8

9 JED MARGOLIN,

10 Plaintiff,

11 v.

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

23 Defendants.

ORDER DENYING
REQUEST FOR SUBMISSION

24 This matter comes before the Court on Plaintiff's Motion for Order to Show Cause
25 Regarding Contempt filed on February 12, 2014. Defendants filed an Opposition to Motion for
26 Order to Show Cause Regarding Contempt on March 3, 2014. Plaintiff filed a Reply in Support
27 of Motion for Order to Show Cause Regarding Contempt and a Request for Submission on
28 March 13, 2014. However, a Notice of Appeal was filed on March 12, 2014.

This Court, based on the Notice of Appeal, is divested of jurisdiction to address issues
that are pending before the Nevada Supreme Court. *See Foster v. Dingwall*, 126 Nev. Adv.

1 Opinion __, 228 P.3d 453 (2010); *see also Mack-Manley v. Manley*, 122 Nev. 849, 855, 138 P.3d
2 525 (2006).

3 Therefore, good cause appearing,

4 IT IS HEREBY ORDERED that this Court will not consider Plaintiff's Motion for Order
5 to Show Cause Regarding Contempt and will not certify its intent to grant or deny said Motion.

6 **IT IS SO ORDERED.**

7 Dated this 17 day of March, 2014.

8
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10 JAMES T. RUSSELL
11 DISTRICT JUDGE
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CERTIFICATE OF MAILING

I hereby certify that on the 17 day of March, 2014, I served a copy of the foregoing by placing the foregoing in the United States Mail, postage prepaid, addressed as follows:

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

Jason D. Woodbury, Esq.
510 West Fourth Street
Carson City, NV 89703



Angela Jeffries
Judicial Assistant, Dept. 1

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Your Name: REZA ZANDIAN
Mailing Address: 6 RUE EDOUARD FOURNIER
City, State, Zip: 75116, PARIS, FRANCE
Telephone: 011-336-1685-7915
In Proper Person

REC'D & FILED
2014 MAR 24 PM 3:08
JED MARGOLIN
DEPUTY

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

JED MARGOLIN) Case No.: 090 C00 5791 1B
Plaintiff/Petitioner,) Dept. No.: II
)
)
) **MOTION**
vs.)
REZA ZANDIAN & OPTIMA TECHNOLOGY)
CORPORATION)
Defendant/Respondent.)

I REZA ZANDIAN, appearing in Proper Person,
(Your Name)
request that the Court enter an Order granting me the following:

State what you want the Court to order. If you have more than one request, clearly list and number each request. Do not explain your requests in detail here, just list them.

- 1) *Please dismiss this case based on the fraud committed on court concerning a frivolous case.*
- 2) *Please set aside and cancel the two default judgments of \$1,495,775.74 and \$1,286,552.46 obtained by a known "Patent Troll" aimed at extortion.*

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***Fully explain why you believe you should be granted your request(s).
List and number each request.***

This Motion is made for the following reasons:

Your Honor,

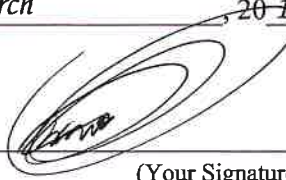
*Thank you for allowing me to tell this court about the true nature of this case.
Please read my 1) Affidavit and 2) The Motion, hereby attached that explain in
detail why my requests should be granted.*

1 (If you need more room, you may attach additional sheets of paper. Be sure you write only on
2 one side of each sheet, number the page or pages 3(a), 3(b), etc. and initial each page at the
3 bottom.)

4 This document does **not** contain the Social Security number of any person.

5 I declare under penalty of perjury under the law of the State of Nevada that the foregoing
6 is true and correct.

7 DATED this 24th day of March, 2014.

8 

(Your Signature)

9
10
11 **CERTIFICATE OF SERVICE**

12 Pursuant to NRC 5(b), the undersigned hereby certifies that on this date, I deposited a
13 true and correct copy of the foregoing Motion in the U.S. Mail with postage pre-paid thereon,
14 addressed to:

15 _____
16 (Name of other party)

_____ (Name of other party)

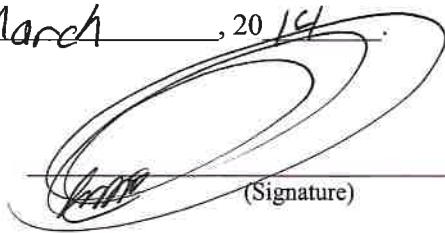
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_____ (Address)

19 _____
20 (City, State, Zip)

_____ (City, State, Zip)

21 Dated this 24th day of March, 2014.

22 

(Signature)

AFFIDAVIT OF REZA ZANDIAN
TO RECONSIDER SETTING ASIDE OF DEFAULT AND
DEFAULT JUDGMENTS OF \$1,495,775.74 AND \$1,286,552.46

I, Reza Zandian, have personal knowledge of the matters set forth herein and being first duly sworn hereby depose and state as follows:

1. I am a named defendant in the matter of Jed Margolin v. Optima Technology Corporation, et. Al. Case No. 090C005791B. My attorneys previously filed the declaration of myself attached as Exhibit 1, for the motion to set aside a default judgment. There is however, additional information necessary to bring to the court's attention to reconsider my request to set aside default and default judgment based on fairness and the merit of the case.

2. As stated in my original half-page affidavit of January 14, 2014, since the withdrawal of my previous attorney John Peter Lee in March 2012, I did not receive any of the pleadings, orders, or discovery related to this case. I believed the lawsuit against me was over, so I was not expecting anything else concerning the case. Mr. Lee had advised me that his motion to quash a judgment of approximately \$120,000 was granted due to the Plaintiff's use of false address and fraudulent service (and because I was living in Paris, France). I believed that ended the case against me. I did not know that attorney Lee had filed an answer for me and I believed that the case against me was over. I did not receive from Mr. Lee any information that he was withdrawing from the lawsuit, which is consistent with my belief that the case against me was finished with the motion to quash stopping the action against me. Justice had been done.

3. However, in October 2013, when I was checking the Lyon County website to make sure my property tax payments were being received by checking whether there were any tax liens against me, I saw a judgment listed against me in the Margolin lawsuit which I thought was finished!! I was at my residence in Paris, France when I discovered the judgment. I have attached a copy of the website page that I reviewed for Lyon County (Exhibit 2). I returned to the United States in November 2013 and hired a lawyer to undo

the fraudulent judgment obtained against me.

4. In reviewing the papers filed by Margolin's lawyers Watson Rounds, I see they claim that I still lived in San Diego based upon U.S. checks and bank statements from bank accounts of mine in the United States. Although a resident of France, I am an Iranian citizen. As a citizen of Iran, I cannot transfer money from Iran accounts into U.S. accounts because of U.S. laws and sanctions. Accordingly, I keep bank accounts in the U.S. to maintain money here in the U.S. so I can pay property taxes on the properties I own in Nevada. The banks maintain U.S. street addresses in their systems despite me using the web to maintain my accounts (banks need a physical address in US to maintain the account). I notified the banks of a change of address from a street address to a P.O. box in San Diego, and they modified and corrected for three accounts, the Wells Fargo Statement for the account 7091505920 for May 4, 2012 is the last statement with Apt. 217 address as account was still used by my wife and son who moved to France on May 4, 2012, the statements of this from May 5, 2012 to present have all my PO Box address, the Wells Fargo bank statement for the account 9760 and 7470 all have my PO Box address for the years 2012, 2013, 2014 as evidenced in Exhibit 3 the bank used a my PO Box number from 2011, but all accounts were not updated by the Bank. That did not worry me as I was doing my banking online via the bank web site and I opted for not receiving the mail version. I have no knowledge of how internal bank documents are kept since these documents were obtained by illegitimate subpoenas from the bank, it is not proof that I actually received these statements. Also, at times I would visit the USA, such as in February 2013, when I could directly access my U.S. bank accounts (such as the withdrawal for \$2,500 – Exhibit 4 in Plaintiff's opposition. Checks sent to my 8775 Costa Verde Blvd. Apt. 217, San Diego, California address were subject to a forwarding order to my P.O. box in San Diego. As such, mail sent to Apt. 217 would be forwarded to my P.O. box and either be picked up by my son in California and then sent to me, or I would stop by the P.O. box and pick the mail up myself the few times I was in the United States. The apartment complex at 8775 Costa Verde Blvd. in San Diego is very large, with over 500 apartment units. Any mail addressed simply to 8775 Costa Verde Blvd., San Diego, CA would not get delivered to my former Apt. 217 nor would it be subject to being forwarded to Apt. 217. Likewise, any mail sent to my former, previous address of

Apt. 501, was no longer subject to being forwarded to Apt. 217, and therefore was also not forwarded to my P.O. box in San Diego.

5. I never received any of the notice of withdrawal by Lee, discovery, default, or judgment notices. The firm “Watson and Rounds” knew of my French address due to their receipt of the appeal documents in March 2013 (they served as attorneys in this appeal), but failed to send any notices to me at my Paris address of which they were aware (see true copy of Appeal address information as Exhibit 4). I am confident that the pleadings they were mailing to me were being returned to them as undeliverable, unable to forward, just at the Nevada Supreme Court encountered in a notice they sent to me at the same outdated address (please see the Nevada Supreme Court order reflecting the non-forwarding in their notice in Exhibit 4). It is very interesting to note that the Watson and Rounds pleading failed to reference that the pleadings they were sending to me for a year were being returned to them from the San Diego address, and do not explain why they then did not also send pleadings to me at the Paris address of which they were aware through the Supreme Court filings. The answer? They did not care about justice; Their intent was only to get a judgment against me. Watson and Rounds does not care about due process in the same way this court cares.

6. Except for two visits to the USA, during about February 20, 2013 to March 1, 2013, and about November 20, 2013 to November 30, 2013, in which the cumulative duration of both trips lasted less than 20 days, I was either residing in France or Iran from May 4, 2012 to March 10, 2014. Attached is my passport (Exhibit 5), which shows all the dates I was in France, the USA, and Iran, during the period from 2011 to the present. I have also attached proof of my utility payments in Paris, France (Exhibit 6). Additional documents that demonstrate I was a Parisian resident, such as my home and resident tax, are included in Exhibit 7. I was not in the USA, and thus did not receive the orders, pleadings, and other critical documents that were used to establish jurisdiction and/or service on me.

7. I would win the dispute in the complaint concerning the patents as the patents at issue are owned by Optima Technology Corporation, a California Corporation, a corporation solely owed by Emfaco S.A., a Swiss Corporation, of which I am the shareholder. As such, my claims to own the patents are valid. The Plaintiff in this

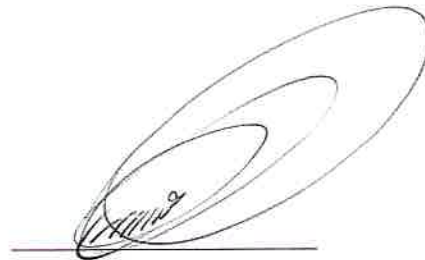
action, Jed Margolin, is an agent, consultant, and employee of Optima, and an associate and partner of Robert Adams, an ex-rogue employee that admitted to using Optima Technology Corporation, a California corporation, funds to purchase the power of attorney over the patents in dispute. The right to use the power of attorney to transfer patent ownership was purchased by Robert Adams in the capacity as CEO of Optima Technology Corporation, a California corporation, not in his capacity as an individual. When this information was learned by those that were being sued by Robert Adams and Jed Margolin for patent infringement, Jed Margolin then terminated the power of attorney and re-issued it to a fraudulent, non-existent entity, with the home of Robert Adams and Jed Margolin listed as its headquarters (1981 Empire Road, Reno, Nevada). However Optima Technology Corporation, a California corporation, had already used the power of attorney to transfer the patent ownership to itself. In spite of this, Margolin, with the help of Robert Adams, then transferred the patents to another Corporation using the Optima name, but this time controlled by Adams and Margolin contrary to the California court's injunction order. Robert Adams has already a judgment debtor with an injunction against him for trying to fraudulently take over the assets of Optima Technology Corporation, a California corporation, in the consolidated actions Zandian vs. Robert Adams and Emfaco vs. Robert Adams with a \$13 million judgment (with an injunction) against Robert Adams in Orange County Superior Court (California) Case Nos. 04CC11007 consolidated with 04CC11008 November 8, 2006 (true certified copy attached as Exhibit 8). Now Robert Adams, through his agent and co-conspirator Margolin, is attempting to steal Optima Technology Corporation, a California corporation's assets again. This should be stopped. The default and default Judgment should be set aside.

8. The action against me is a fraud, because the attorneys, Watson and Rounds, for Plaintiff Jed Margolin, had full knowledge of all these facts, yet intentionally ignored them to get default judgments issued against me. The action against me is a fraud because of the detailed explanations and exhibits hereby attached as part of this affidavit for your review and consideration.

The alleged pleadings that were used to support a judgment against me, were never received by me, nor were they known of by me. Your Honor, I kindly ask for you to set aside the default, default judgment, and to dismiss this action against me after considering the merit and true nature surrounding this case.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

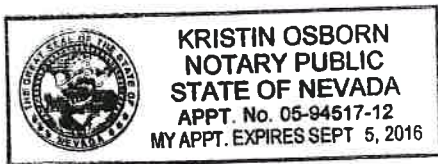
Executed on March 24, 2014 at Carson City, Nevada ~~California~~



Reza Zandian
Declarant

State of Nevada
County of Carson

This instrument was acknowledged before me, Kristin Osborn on March 24, 2014, by Reza Zandian.



Notary Public

My Commission Expires Sept. 5, 2016



Robert Adams
CEO

World Headquarters
6 rue Edouard Fournier
Paris, France 75116

U.S.A. Corporate Offices
2102 Business Center Drive
Irvine, CA 92612

phone 949-476-0515
fax 949-253-5769



Reza Zandian
Vice President
Finance & Operations

Optima Technology Corp.
17526 Von Karman
Irvine, CA 92714
Tel: 714/476-0515
Fax: 714/476-0613
Telex: 67 88 48

**REZA ZANDIAN
6 RUE EDOUARD FOURNIER
PARIS, FRANCE 75116 FR**

**Motion to Dismiss Case No. 090C005791B and Vacate
Default Judgments of \$1,495,775.74 and \$1,286,552.46**

To The Honorable Judge James T. Russell,

Your Honor,

My name is Gholam Reza Zandian Jazi (Reza Zandian). I am residing in France and Iran. In the 1990's, I formed a storage software company called Optima Technology Corporation (“OTC”) that was based in Irvine, California. Between November 2002 and March 2007, I was in the real-estate development business and bought some vacant lands throughout northern Nevada for my investors. Like many others in the real-estate industry, I was hit hard when the market crashed in 2007-2008.

In August 2011, I moved to Paris, France, and a few months later my wife and two children joined me. My family and I live at 6 Rue Eduoard Fournier, Paris, France, a home I originally purchased in 1989. Since 2011, all of my taxes and utility bills are paid in France. The proper venue and jurisdiction for any case against me is Pontoise, France. Examinations of my passport and French Residency Card, in Exhibit A, reveal that between the dates August 2011 and March 8, 2014, I only traveled to the United States on two occasions, each lasting less than 10 days. In addition being domiciled in France, I frequently visit my ailing, 85-year old mother who resides in Tehran, Iran.

I am writing this letter to inform you that the three default judgments you issued against me and my revoked company, Optima Technology Corporation (OTC), were obtained fraudulently by individuals that have a history of engaging in frivolous lawsuits aimed at extortion. The Plaintiff, Jed Margolin, and his accomplice Robert Adams, have a well-documented history of threatening, blackmailing, and suing large companies, like NASA, Universal Avionics Systems Corporation, Roxio, and Network Solutions, with baseless claims of patent infringement [Exhibit J, “COMPLAINT”]. Likewise in this case, *the Plaintiff, Jed Margolin, is attempting to extort me out of \$1,495,775.74.*

1. FALSE SERVICE IN BAD FAITH.

Attorneys for the Plaintiff, Watson and Rounds, knew that I, Reza Zandian, was living at 6 RUE EDOUARD FOURNIER PARIS, FRANCE, 75116, yet knowingly served me at false addresses in an effort to obtain illegitimate Default Judgments. As evidenced in Exhibit A, "NOTICE OF POSTING COST BOND," since March, 2013, Watson and Rounds was aware of my real address. The attorneys for the Plaintiff, Watson and Rounds, also represented the Respondents in a separate 2013 case I appealed, as the Appellant, to the Supreme Court of the State of Nevada (Supreme Court No. 62839). As evidenced by Exhibit A, "CIVIL PROPER PERSON TRANSCRIPT REQUEST FORM," and "CIVIL PROPER PERSON APPEAL STATEMENT," attorneys for the Plaintiff, Watson and Rounds, were aware of my French address since April 5th, 2013. Due to my absence and an incompetent defense in this Appeal, Watson and Rounds shared in \$90,372.50 of income that taken from me [Exhibit Z]. This emboldened Watson and Rounds with greed and motivated them to pursue additional opportunistic actions against me. For this reason, it is suspected that the attorneys for the Plaintiff are working for contingency. Furthermore, throughout this appeal process, The Supreme Court of Nevada sent several letters directly to my house at 6 RUE EDOUARD FOURNIER, PARIS, FRANCE, 75116, [Exhibit A]. Attorneys for the Plaintiff, Watson and Rounds, knew of my real address through direct legal communications and Supreme Court documents, yet acted in bad faith by serving me at: 8401 BONITA DOWNS ROAD, FAIR OAKS, CA, 95628. I, Reza Zandian, have never been to, lived at, or maintained any association with, this alleged Fair Oaks, California address; the same holds true for my former company, Optima Technology Corporation (OTC). Watson and Rounds, knew of my authentic address in Paris, France, yet chose to serve me through obscure publications in Las Vegas, Nevada and San Diego, California, in an effort to receive a favorable outcome for the Plaintiff, despite knowing that the proper jurisdiction and venue is in France.

I find it very troubling that the Plaintiff's attorney, Watson and Rounds, not only knowingly served me at an incorrect address, but that they also illegitimately requested a Debtor's Examination against me, with the sole intent of hoping to hold me in contempt

of court. From my understanding, A Debtor's Examination can only be applied to an individual that resides within the local jurisdiction of the Carson City Court. The attorneys for the Plaintiff, Jed Margolin, knew that I was not a resident of Nevada, and thereby was ineligible for consideration of a Debtor's Examination. Furthermore, Watson and Rounds was also fully cognizant of the fact that I was residing in either France or Iran, and would not be able to make an appearance in a timely manner, yet still attempted to pursue this matter with a detrimental intention. I find it highly conspicuous that the attorneys for the Plaintiff have, on several occasions, acted in bad faith with respect to cases against me.

2. INABILITY TO RECEIVE CRITICAL DOCUMENTS.

Your Honor, as I mentioned in my Affidavit, I did not receive critical documents relating to this case, which included: pleadings, orders, discovery, default, or judgment notices relating to this case. I also never received any Notice of Withdrawal from my attorney John Peter Lee. Prior to moving to France, I lived at 8775 COSTA VERDE BLVD, San Diego, California, an apartment complex with hundreds of apartment units. At this complex, I had lived in apartments 1416, 416, 501, and lastly 217. In 2010, I obtained a post office mailbox: PO BOX 927674, in San Diego, California as preparation for my imminent move to Paris, France. All mail from my last apartment (Apt. 217) at 8775 Costa Verde Blvd, was forwarded to my P.O. Mailbox. I notified the US Postal Services of San Diego, The Nevada Secretary of State, Lyon County, Churchill County, Elko County, Washoe County, and Wells Fargo to forward all of my mail from 8775 Costa Verde Blvd, Apt. 217 to PO BOX 927674. My use of this post office mailbox is chronologically documented through checks I issued through Wells Fargo on September 14, 2010 [Exhibit B] and December 1, 2010 [Exhibit B], as well letters from both the California Secretary of State dated on February 2, 2011 [Exhibit B] and the IRS dated September 12, 2011 [Exhibit B]. My oldest, and only son residing in the United States, would intermittently travel to San Diego and collect any mail I had received at this mailbox. On one of my son's trips to San Diego in October 10, 2013, he informed me via email that the mailbox had expired and been closed since April 22nd, 2013 [Exhibit B]. My son renewed the mailbox on this visit in October. But this unfortunately meant I was

unable to receive any mail at this mailbox for the six-month period of April 22, 2013 to October 10, 2013.

3. TRUE IDENTITY AND MOTIVE OF PLAINTIFF, JED MARGOLIN.

I have never seen or met the Plaintiff, Jed Margolin. The only connection I have to this man is through Robert Adams, a former, rogue employee of mine that worked for OTC in 1990-1995 and 2001-2005. Shortly after Robert Adams returned to OTC, in 2002, he tried to overtake control of my company and damage my reputation through a series of libelous, slanderous, and malicious press releases he published during 2004 and 2005. Robert Adams also attempted to embezzle me through forgery of my signature. In the 2006 case of EMFACO S.A. and Reza Zandian vs. Robert Adams (Case No.: 06CC08517), represented by Carl J. Pentis Esq. of Wildish and Nialis, I sued Robert Adams for defamation and damages and received a \$13,101,000 judgment against Robert Adams, a true original certified copy of which is hereby attached [Exhibit C]. The judgment included interest payments and explicitly prohibited Robert Adams from ever, directly or indirectly, using Optima's name, products, or software [Exhibit C page 4, Judgment 04CC11008, Page 2-3]. More importantly, the judgment called for,

“[A] Permanent injunction against Robert Adams and his agents, servants, employees, and all persons acting under, in concert with, or for him.” [Exhibit C page 4, Judgment 04CC11008, Page 3, Lines 18-19]

Simply put Your Honor, Robert Adams is using the Plaintiff, Jed Margolin, as a façade to evade the \$13,101,000 judgment against him. The Plaintiff, Jed Margolin, is an agent of Robert Adams, the ex-rouge employee, fugitive, and conman, against whom we have secured a \$13,101,000 judgment. The Plaintiff, Jed Margolin, is trying to fraudulently obtain default judgments against me to avenge his friend and partner Robert Adams. **The following is strong empirical evidence that the Plaintiff, Jed Margolin, and Robert Adams are co-conspirators with indisputable ties one another:**

I. Plaintiff, Jed Margolin, uses two variations of the same address on all of his documents and on the letterheads of Optima Technology (My company):

- a) 1981 Empire Road, Reno, Nevada, 89521-7430
- b) 1981 Empire Road, VC Highlands, Nevada, 89521-7430

The following are references in which Jed Margolin uses this Reno address:

- i) August 5, 2008 letter from Jed Margolin to NASA Headquarters. [Exhibit I]
- ii) November 5, 2009 letter from Jed Margolin to NASA Headquarters. [Exhibit I]

II. Robert Adams also uses the same exact address as Jed Margolin on all of his documents and on the letterheads of Optima Technology (My company):

- a) 1981 Empire Road, Reno, Nevada, 89521-7430
- b) 1981 Empire Road, VC Highlands, Nevada, 89521-7430

The following are references in which Robert Adams uses this Reno address:

- i) August 1, 2008 Letter by Robert Adams to NASA Headquarters. [Exhibit I]
- ii) Certified Mail sent from NASA to Robert Adams. [Exhibit H]
- iii) August 1, 2007 Letter from Robert Adams to Ionatron, Inc. [Exhibit H]

“1981 Empire Road, Reno, NV, 89521” is the only address that Udall Law Firm (previously unpaid attorneys for Margolin and Adams), NASA, and Reza Zandian have been able to identify for the Robert Adams. It is believed that Robert Adams is seeking asylum with help of his alias Jed Margolin in Reno, Nevada. That is why the two men share one home as the headquarters of a company that uses the “Optima” name, contrary to the injunction order.

III. Complaints by Universal Avionics Systems against Jed Margolin revealed that Jed Margolin appointed Robert Adams as his ‘agent’ and granted him Durable Power of Attorney (“DPA”) to act as his Attorney-in-fact on behalf of my company. [Exhibit E]

IV. On or about 2008, Robert Adams and Plaintiff, Jed Margolin, together formed Optima Technology Group (“OTG”), a fictitious business entity in the Cayman Islands. This took place after Robert Adams had already received a \$13,101,000 judgment against him in 2006 and was precluded from any association with “Optima” per court ruling, [Exhibit C page 4, Judgment 04CC11008, Page 2-3]. Inter-State Investigative Services found that “the Cayman Islands address of Optima Technology Group Inc., (“OTG”) does not belong to OPTIMA TECHNOLOGY and that there is no telephone number

associated with the address,” [Exhibit L, PLAINTIFF’S MOTION TO EXTEND TIME TO SECURE SERVICE OF PROCESS UPON DEFENDANT ROBERT ADAMS”].

V. Robert Adams describes Jed Margolin as an employee, and as his “Chief Scientist” of Optima Technology Group.

VI. Documents and emails from the October, 2004 case of Optima Technology Corp (OTC) vs. Roxio Inc. indicate that Jed Margolin was a consultant and/or employee of Robert Adams, and hence indirectly a former employee of OTC. [Exhibit M]

VII. On November 7th, 2008, Udall Law Firm, L.L.P filed a case against Jed Margolin and Robert Adams for unpaid legal fees of \$46,446.10. Edward Moomjian, representing Plaintiff Udall, expressed great frustration with the inability to locate the whereabouts of Robert Adams [Exhibit L, “PLAINTIFF MOTION TO EXTEND TIME TO SECURE SERVICE OF PROCESS ON ROBERT ADAMS”]:

“Plaintiff has made diligent attempts to secure service of process upon Defendant Robert Adams, but those attempts have been unsuccessful because Robert Adams is avoiding service, intentionally refuses to provide his location information necessary to serve process upon him, and intentionally refuses to sign a waiver of service which was electronically delivered to him.”

“Jed Margolin provided to the Plaintiff a Cayman Islands address where the headquarters of Optima Technology is allegedly located and another potential address for Defendant Robert Adams: 474 White Cap Lane, Newport Coast, CA, 92657.”

All of these addresses turned out to be erroneous. Jed Margolin deliberately provided incorrect information to conceal the true location and whereabouts of Robert Adams. In Exhibit L, “AFFIDAVIT OF PROPRIETY OF SERVICE OF PUBLICATION,” Edward Moomjian II, of Udall Law firm, explains that despite having a team of private investigators, and a list of over 10 suspected addresses, homes, and PO boxes, his firm was unable to locate Robert Adams, who was deliberately avoiding service to avoid paying \$46,446.10.

VII. Robert Adams issued false, libelous, slanderous and press releases and emails claiming that the “Special Agents with U.S Homeland security have offered a reward for Mr. Zandian,” [Exhibit Q]. Robert Adams signs these press releases as a “loyal concerned citizen,” [Exhibit, Q]. The language of Robert Adams’ fabricated press 2004-2005 releases and emails bare a striking resemblance to Jed Margolin’s Voluntary Statement issued on February 6, 2008 [Exhibit R]. Margolin regurgitates the same false information claiming his “attorneys have been in contact with the FBI,” [Exhibit]. Like Robert Adams, Jed Margolin also signs these a “concerned that Mr. Zandian may be up to some mischief in our County,” [Exhibit R]. It does not take much ingenuity to draw parallels between the writing styles, structure, and content shared between Adams and Margolin. It is clear that Robert Adams and Jed Margolin work together, with an interest aligned in destroying Reza Zandian’s reputation.

IX. Jed Margolin also uses Robert Adams’ and OTC’s former Irvine, California address of 2222 Michelson Drive, Suite 1830, interchangeably with his own. [Exhibit H]

4. PATENTS-IN-SUIT BY PLAINTIFF ARE FRAUDULENT AND INVALID.

These patents-in-suit are illegitimate, invalid, and fraudulently back-dated by Jed Margolin, who is described by Universal Avionics Systems as a “patent troll,” [Exhibit J, [COMPLAINT]], and Robert Adams, whose girlfriend was working at the US Patent and Trademark Office (UTSPO). Documents signed by Jed Margolin and Robert Adams clearly show that the patents in question were assigned to Optima Technology Inc., of Irvine, California on July 20, 2004, [Exhibit E]. Then at some point between September 21, 2007 and October 5, 2007, Margolin created a Patent Assignment which he “knowingly and fraudulently back-dated to July 20, 2004,” whereby he attempted to assign the entire right, title and interest in the ‘073 and ‘724 patents to Optima Technology Group Inc., a Delaware Corporation, [Exhibit E, Exhibit J]. Then later on a motion filed by Jed Margolin in December 11, 2009, he declares that in July 2004, he granted these patents-in-suit to Optima Technology Group (“OTG”), a Cayman Islands Corporation, [Exhibit F].

Optima Technology Corporation (OTC) was an Irvine, California based company founded by Reza Zandian in January 1990, which specialized in creating software storage

for Apple Computers. Reza Zandian, the founder, owner, sole director, and sole voting shareholder of Optima Technology Corporation (OTC), retained his ownership in OTC until June 1997 then transferred the ownership to EMFACO, S.A. a Swiss Corporation.

In January of 1993, Reza Zandian was at the center of a highly publicized case in which the Federal Government accused him and his associate Charles Reger of illegally exporting high-powered IBM computers to Iran. On July 7, 1993 however, U.S. District Judge Edward Rafeedie threw out the case and dismissed all charges against Reza Zandian and Charles Reger.

Excerpt From Exhibit P, a Los Angeles times article:

“In granting the defense motion, Rafeedie called the remaining counts a "desperate attempt" by the government to salvage its case. Reger said the judge "basically said this is crap. That's what it boils down to." Los Angeles attorney Alan Rubin, who represented Reger, said Rafeedie's decision "took a lot of courage."

In 2002, Robert Adams was nominated as the CEO of Optima Technology Corporation (OTC) of California to help revitalize the company. It was realized shortly after that Robert Adams was indeed a conman. Contrary to his fiduciary duties however, Adams tried to overtake control and ownership of the company. In 2004 and 2005, Adams issued a series of misleading, libelous, and slanderous press releases suggesting that the FBI was looking for Reza Zandian who was a ‘terrorist’; Adams also made reference to the dismissed 1993 Export Case against Zandian, in a desperate effort to misconstrue reality and falsely damage Zandian’s reputation and credibility.

In wake of Robert Adams behavior, Reza Zandian incorporated Optima Technology Corporation (OTC) in Nevada in 2004, and was determined to take legal action against his deviant employee. During the legal proceedings that followed, it was revealed that in 2004, without Mr. Zandian’s consent or authorization, Robert Adams had licensed OTC’s software to a company by the name of Soft 77 L.L.C for \$225,000. In the 2006 case of EMFACO S.A. and Reza Zandian vs. Robert Adams (Case No.: 06CC08517), represented by Carl J. Pentis Esq. of Wildish and Nialis, Reza Zandian received a

\$13,101,000 judgment against Robert Adams [Exhibit C]. The judgment included interest payments and explicitly prohibited Robert Adams from ever directly or indirectly using Optima's name, products, or software. It is important to note that a few weeks before the judgment was issued against Robert Adams, Robert Adams emailed Reza Zandian's attorney, Carl Pentis, with a settlement offer. In this offer, he agreed to return all assets, licenses from "Optima Technology Corporation ("Optima"), a Delaware corporation, having a perpetual place of business located at Irvine, California," [Exhibit C]. The settle offer was declined, but by Robert Adams' own admission, Optima Technology Corporation (OTC) of Irvine, California and Optima Technology Inc., of Delaware are in fact the same entity. With a \$13,101,000 judgment against him, Robert Adams fled and was not heard from until 2007.

In 2007 Reza Zandian received a call from Scott. J. Bornstein of Greenberg Traurig LLP, New York, informing him that Robert Adams of Optima Technology was suing Arizona-based Universal Avionics for patent infringement claiming royalties and damages. Reza Zandian informed Mr. Bornstein that he himself was the true director of OTC, and that Robert Adams was a fraud with an outstanding judgment against him for thirteen million dollars [Exhibit X]. Despite the conditions set forth in the judgment against him one year earlier, Robert Adams continued to illegally associate himself with Optima. Original documents provided by Mr. Bornstein revealed that Robert Adams had obtained 4 patents from Jed Margolin and assigned these patents to Optima Technology Inc on July 20th, 2004. On the legal documents concerning the assignment of these patents, Robert Adams uses the Irvine operating address of OTC, which was 2222 Michelson, Suite 1850, Irvine, CA, 92612. Robert Adams signed this agreement as the Attorney-in-fact for Jed Margolin; This Durable Power of Attorney was executed on July 20, 2004 in California.

In an effort to circumvent the judgment against him and continue illegally operating under the "Optima" name, Robert Adams, along with his agent Jed Margolin, created two fraudulent entities: Optima Technology Inc, in Delaware and Optima Technology Group (OTG) in the Cayman Islands in 2008.

Robert Adams and Jed Margolin then began a series of frivolous lawsuits against large, established companies like NASA, Universal Avionics Systems, and Roxio, and threatened and blackmailed Honeywell, Garmin, and Rapid Imaging Software, claiming patent infringement. In his correspondences with these companies, Robert Adams fraudulently calls himself “Dr. Robert Adams” to create the illusion of credibility, despite the fact that he is not a medical doctor, chiropractor, and lacks any doctorate degree (Ph.D). Robert Adams characterizes his agent, Jed Margolin, as an employee and the “Chief Scientist” of Optima Technology Group (OTG). Their intent is simply to blackmail, threaten, and extort large companies and seek illegitimate pecuniary settlements.

Email from Robert Adams and Jed Margolin to Mike Abernethy, of Rapid Imagine Software Inc. (RIS) illustrate how Adams and Margolin engage in threats, blackmail and baseless patents lawsuits. Mr. Abernethy describes OTG as “*patent trolls*” [Exhibit N] in a November 25, 2008 email, and goes on to state in an October 03, 2008 email that:

“Last week I received an email from Optima Technology Group threatening to destroy our relationships with customers and sue us if we don’t license their technologies.”
- Mike Abernethy, [Exhibit N]

“In 1999 the patent office issues a patent to a former Atari employee named Margolin for a Synthetic Environment for Remotely Piloted Vehicle. He had evidently applied for it in 1996. Shortly thereafter he begins to complain to NASA that they and RIS infringed upon his patent presumably by flying a system 2 years before he received his patent. Is this a joke?” - Mike Abernethy, [Exhibit N]

“These patents are defective because the invention is both obvious and non-novel as evidenced by numerous printed published works. Ironically, they claim patent on work already published by NASA over a decade earlier.” - Mike Abernethy, [Exhibit N]

“In other words, OTG is attempting to force NASA to pay for a patent infringement on something that NASA in fact invented and published more than a decade prior to the patent filing.”
- Mike Abernethy, [Exhibit N]

NASA's Intellectual Property Counsel, Edward K. Fein characterizes that Margolin and Adams are:

“They are aware of the likelihood that the patent is invalid, based on prior art, much of which has been furnished by Mike Abernethy, but still want an analysis of potential infringement.” [Exhibit N]

Like NASA, Universal Avionics Systems hired a strong defense team and was fully vindicated of all charges. In **Case No. CV-00588-RC**, Universal Avionics Systems Corporation filed a complaint vs. Optima Technology Group, Inc. (OTG), Optima Technology Corporation (OTC), and Jed Margolin. The complaint by Universal Avionics Systems complaint states:

“In simple terms, Defendants OTG, its President and CEO Robert Adams (“Adams”), and Margolin, made repeated and baseless threats to Universal regarding several patents purportedly owned by OTG.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 1]

“Upon information and belief, at some point between September 21, 2007 and October 5, 2007, Margolin created a Patent Assignment which he knowingly and fraudulently back-dated to July 20, 2004, whereby he attempted to assign the entire right, title and interest in the ‘073 and ‘724 patents to OTG.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 8]

“Upon information and belief, on or about July 20, 2004, Margolin executed a Durable Power of Attorney, whereby he appointed “Optima Technology Inc. – Robert Adams, CEO” as his agent with the “Powers to manage, dispose of, sell and convey” various issued patents, including the ‘074 and ‘724 patents. The Durable Power of Attorney was directed to the registered address for OTC.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 3]

“On or about July 16, 2007, Adams began to issue not-so-subtle threats against Universal, suggesting that OTG would grant a license under the Patents-in-Suit to Honeywell – so that Honeywell could sue Universal – should Universal decline OTG’s offer.” – [Exhibit J, “COMPLAINT,” Page 5]

“Universal was represented at the Tucson Meeting by several members of senior management, along with its outside legal counsel. Adams was the sole representative for OTG and gave the impression that he was acting on behalf of both OTG and Margolin.” [Exhibit J, “SECOND AMENDED COMPLAINT”]

“At the Tucson Meeting, Adams also (mis)represented that Optima had been involved in a number of successful patent infringement lawsuits past. By implication, he suggested that if Universal failed to settle on terms acceptable to the Defendants, it would be the next litigation target.” [Exhibit J, “COMPLAINT,” Page 6]

“Adams, OTG’s current president and CEO, was a paid employee of Defendant OTC from 1990-1995 and its unpaid CEO from 2001 to 2005. The Durable Power of Attorney that Margolin executed on July 20, 2004 whereby he appointed “Optima Technology Inc. – Robert Adams, CEO” as his agent, was entered into during Adams’ tenure as OTC’s CEO. Additionally, the Durable Power of Attorney provided the following address for Optima Technology Inc: 2222 Michelson, Suite 1830, Irvine, California, 92612 – the registered address for Defendant OTC.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 7]

“Mercury advised that Optima, through Dr. Adams, had been threatening Mercury for many months in an attempt to convince Mercury to enter into a license agreement under the Optima Intellectual Property. Adams was characterized as a ‘snake oil salesman’ and his behavior was characterized as ‘bizarre.’ [Exhibit J, “COMPLAINT,” Page 8]

“There is a dispute as to the ownership of the ‘073 and ‘724 patents, as both Defendant Optima Technology Corporation (“OTC”) and Optima Technology Group, Inc., (“OTG”) have claimed ownership. Both OTG and OTC appear to

base their respective ownership claims, at least in part, upon a Durable Power of Attorney (the “DPA”) that Margolin signed, whereby he appointed “Optima Technology Inc. – Robert Adams, CEO” as his agent with the “powers to manage, dispose off, sell and convey” various issued patents, including the patent in suit. Importantly, Adams –OTG’s current CEO – was OTC’s CEO at the time the DPA allegedly was executed and the DPA was directed to the registered address of OTC – not OTG. Although the Court previously granted default judgment in connection with OTG’s ownership claims of the patent-in-suit against OTC, the issue of ownership still remains in this case. If OTG’s assertions were correct, that the default judgment against OTC precluded Universal from arguing that OTG lacks right, title, and interest in the patents-in-suit, by the same logic, OTG should be precluded from asserting infringement and validity of the patent’s based upon the Court’s entry of default judgment in favor of Universal against OTC to that same effect. In short, OTG continues to misinterpret the Court’s recent orders relating to the default judgment in an apparent effort to deprive Universal of its rightful defenses in this action.” [Exhibit J, “JOINT RULE 26(f),” Page 11]

“To further confound the matter of ownership, however, Margolin, the alleged inventor of the patented technology, by his own belated admission, back-dated a purported “Patent Assignment” to Optima (OTG) by more than three years in an apparent attempt to create the appearance that the patents-in-suit were properly transferred to Optima. Margolin had ‘fraudulently’ back-dated the assignment of the patents-in-suit to Optima.” [Exhibit J, “JOINT RULE 26(f),” Page 12]

In May 2009, Robert Adams’ previous law firm, Udall, Law Firm, L.L.P, received a default judgment against Adams, that ordered that Optima Technology Group, Inc., (“OTG”) and Robert Adams to pay \$46,446.10 plus pre-judgment interest at a rate of 10% from July 18, 2008.” [Exhibit L, “DEFAULT JUDGMENT AGAINST ADAMS”]

During the Arizona-based Case of Universal Avionics Systems vs. Optima Technology Group, Inc., (Jed Margolin & Robert Adams), Reza Zandian’s attorney John

Peter Lee of Las Vegas, Nevada maintained clear communications with Greenberg Traurig, LLP, the attorneys for Universal Avionics Systems Corporation.

On January 4th, 2008, John Peter Lee emailed Scott J. Bornstein informing him:

“I have conferred with our client, Reza Zandian, in control of Optima Technology Corporation (OTC), also designated as Optima Technology, Inc., and have advised him concerning your reaction to our being dismissed from the captioned litigation. Mr. Zandian is not interested in granting Universal a free license; neither does he wish to enmesh Optima in what promises to be a complex and unproductive Arizona litigation.

Optima Technology Corporation (Optima Technology, Inc.) was originally formed in the State of California and has had no business ties to the State of Arizona. The Complaint alleges, however, that Optima, through Robert Adams, committed wrongful acts in Arizona. However, the Complaint and the attached documentation to the Complaint indicates that the wrongful acts were attributable to Optima Technology Group, a non-existent entity. Although Robert Adams was at one time an officer of Optima, he was removed from this position in October of 2006, and has had no relationship with Optima during the time span referred by you in your Complaint encompassing July, 2007 to November, 2007. In fact, Optima has a judgment against Adams, a copy of which, we understand you already have. Adams, although he may have represented Optima before October, 2006 has had absolutely no contact with Optima since that time, and certainly was not authorized to harass Universal in Arizona or any place else.

We are troubled with the allegations of the Complaint, which apparently have been framed to give personal jurisdiction in the Arizona courts over Optima. However, as already stated, there is no support for the jurisdictional allegations attempting to tie Optima to Arizona.

Optima cannot afford financially or legally to become involved in the Arizona litigation. The Complaint as drafted is a quagmire with too many traps, which

could mesh Optima in an extremely costly and non-productive litigation over issues with simply don't belong in the Arizona courts.

We request, since you are on notice of the true facts in this case, that you dismiss Optima Technology Corporation from the Complaint and Optima gives you notice pursuant to FRCP 11 that this process should be done immediately...we intend no further proceedings at this point.”

-John Peter Lee, Esq. [Exhibit K]

John Peter Lee's assertion that Optima Technology Corporation and Optima Technology Inc., are in fact the same entity, is also shared by OTC's tenured CPA. Optima's publically certified public accountant (CPA) since 1990, Mr. Bijan Akhavan, commonly referred to Optima Technology Corporation as Optima Technology Inc. This is demonstrated in the Employer's Quarterly Federal Tax Return, dated September 30, 2004, [Exhibit G] and throughout various tax documents filed by Mr. Akhavan for U.S administration [Exhibit G].

Additionally in a February 19th, 2008 email from John Peter Lee to Reza Zandian, John Peter Lee states:

“We have determined that it would be unprofitable to appear in the Arizona action brought by Adams, et al. Accordingly, we will not do so. We both believe that the case will implode, and that we will deal with Bornstein to resolve the cases.”

-John Peter Lee, Esq. [Exhibit K]

Based on communications between John Peter Lee and Greenberg Traurig, it was clear that Universal Avionics had been made aware of the fact that Reza Zandian and Optima Technology Corporation (OTC) were the true legitimate owners of the patents in question. In an attempt to settle with Reza Zandian, Universal Avionics Systems sent Reza Zandian a “Patent License and Settlement Agreement, ” in which “Universal agrees to provide Optima with cooperation and assistance in Optima's efforts at licensing the Optima Patents to third parties, with Optima receiving 85% and Universal receiving 15% thereof,” [Exhibit K, “PATENT LICENSE AND SETTLEMENT AGREEMENT”]. Exhibit K, “STIPULATOIN AND ORDER OF DISMISSAL,” illustrates that Universal

Avionics Systems Corporation intended to dismiss Optima Technology Corporation (“OTC”) and its sole officer Reza Zandian from the Arizona Case. Furthermore, Reza Zandian met with Derek at the offices of Greenberg Traurig, LLP, in Santa Monica, California at 10:35AM on June 30, 2008, with the intent of making a deposition in the Case of Universal Avionics Systems vs. Optima Technology Group, Inc., Optima Technology Corporation, and Jed Margolin [Exhibit K]. However, Greenberg Traurig refused to take the deposition and relevant documents from Reza Zandian.

5. ALL CLAIMS BY THE PLAINTIFF HAVE ALREADY BEEN DISMISSED IN COURT

On September 23rd, 2008, United States District Judge Raner C. Collins ordered that Case No. CV 07-588-TUC-RCC, Universal Avionics systems Corporation vs. Optima Technology Group, Inc., et al., be closed. The motion reads:

“IT IS HEREBY ORDERED all claims and counterclaims in this action are dismissed with prejudice and the Clerk shall CLOSE this case.

IT IS FURTHER ORDERED that each party shall be responsible for paying its own attorneys’ fees and costs incurred in this action.

Dated this 23rd day of September, 2008.”

-US District Judge Raner C. Collins [Exhibit J, “ORDER”]

US District Judge Raner C. Collins describes Margolin’s fraudulently backdated patents as “*invalid and unenforceable*,” [Exhibit J, “ORDER”]. Judge Raner C. Collins goes on to state that:

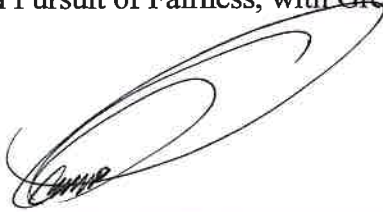
“Optima Technology Group’s Default Judgment resolved the issue between Optima Technology Group and Optima Technology Corporation in the exact same way Universal’s Default Judgment resolves the issues between Universals and Optima Technology Corporation.”

-US District Judge Raner C. Collins [Exhibit J, “ORDER”]

Your Honor,

Out of fairness concerning the true nature, merit, and motives of this case, I implore you to dismiss these baseless lawsuits by the Plaintiff, Jed Margolin, who simply put, is trying to fraudulently extort me out of \$1,495,775.74 and \$1,286,552.46.

In Pursuit of Fairness, with Great Respect, and Deep Sincerity,

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

REZA ZANDIAN



Robert Adams
CEO

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6 rue Edouard Fournier
Paris, France 75116

U.S.A. Corporate Offices
2102 Business Center Drive
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phone 949-476-0515
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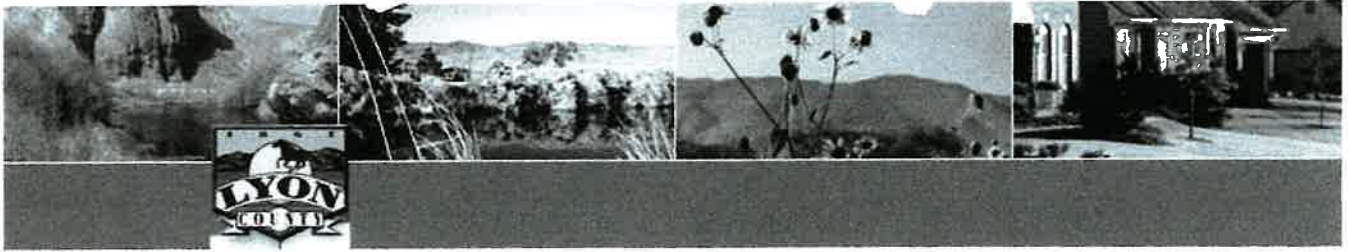
Reza Zandian
Vice President
Finance & Operations

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Reya, Call me

949-931-9208

in LV until Sunday



Recorder Home

LYON COUNTY Document Inquiry

Order List By: Name Document # Document Type Recording Date Township/Range/Section

Filters: Limit Selected Documents to Include (Choose any number):

Name: ZANDIAN Document #/Suffix: Section:
 Type: All Party: Township:
 Date Range: - MMDDYYYY Parcel Number: 8 digits Range:
 Description: Subdivision: Max Result Pages: 50

Warning: A higher number of search result pages will result in slower searches.

Search

Search Results - Select for Detail

	Name	Party	Doc Type	Doc #	Recording Date	Book/Page	Sec/Town/Rng
Open	ZANDIAN GHOLAM REZA	1	JUDGMENT	511155	8/16/2013		
Open	ZANDIAN REZA	2	DEED	341941	2/01/2005		
Open	ZANDIAN REZA	2	DEED	341942	2/01/2005		
Open	ZANDIAN REZA	1	DEED OF TRUST	341943	2/01/2005		
Open	ZANDIAN REZA	2	DEED	341944	2/01/2005		
Open	ZANDIAN REZA	2	DEED	341945	2/01/2005		
Open	ZANDIAN REZA	1	DEED OF TRUST	341946	2/01/2005		
Open	ZANDIAN REZA	2	DEED	342193	2/04/2005		
Open	ZANDIAN REZA	2	DEED	342194	2/04/2005		
Open	ZANDIAN REZA	2	DEED	343180	2/16/2005		
Open	ZANDIAN REZA	2	DEED	343181	2/16/2005		
Open	ZANDIAN REZA	1	DEED OF TRUST	343182	2/16/2005		
Open	ZANDIAN REZA	1	DEED	343763	2/25/2005		
Open	ZANDIAN REZA	2	DEED	344412	3/03/2005		
Open	ZANDIAN REZA	1	DEED OF TRUST	344413	3/03/2005		
Open	ZANDIAN REZA	1	DEED	354434	6/22/2005		
Open	ZANDIAN REZA	2	DEED	354434	6/22/2005		
Open	ZANDIAN REZA	1	DEED	354436	6/22/2005		
Open	ZANDIAN REZA	2	DEED	356791	7/19/2005		

Wells Fargo® Preferred Checking

Account number: **7091505920** ■ April 6, 2012 - May 4, 2012 ■ Page 1 of 5



G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN
8775 COSTA VERDE BLVD APT 217
SAN DIEGO CA 92122-5340

Questions?

Available by phone 24 hours a day, 7 days a week:

1-800-TO-WELLS (1-800-869-3557)

TTY: 1-800-877-4833

En español: 1-877-727-2932

華語 1-800-288-2288 (6 am to 7 pm PT, M-F)

Online: wellsfargo.com

Write: Wells Fargo Bank, N.A. (114)
P.O. Box 6995
Portland, OR 97228-6995

You and Wells Fargo

Thank you for being a Wells Fargo customer. We appreciate your business and understand that you are entrusting us with your banking needs. Let us assist you in finding the right accounts and services to help you reach your financial goals. Please visit us online at wellsfargo.com, call us at the number at the top of your statement, or visit any Wells Fargo store - we'd love to hear from you!

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wellsfargo.com or call the number above if you have questions or if you would like to add new services.

Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Rewards Program	<input type="checkbox"/>
Online Statements	<input type="checkbox"/>	Auto Transfer/Payment	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
		Overdraft Service	<input type="checkbox"/>

Activity summary

Beginning balance on 4/6	\$342.91
Deposits/Additions	4,274.57
Withdrawals/Subtractions	- 3,396.49
Ending balance on 5/4	\$1,220.99

Account number: **7091505920**

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

- Savings - 000002961476971

Wells Fargo® Preferred Checking

Account number: 7091505920 ■ May 5, 2012 - June 6, 2012 ■ Page 1 of 3

WELLS
FARGO

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

Questions?

Available by phone 24 hours a day, 7 days a week:

1-800-TO-WELLS (1-800-869-3557)

TTY: 1-800-877-4833

En español: 1-877-727-2932

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P.O. Box 6995
Portland, OR 97228-6995

You and Wells Fargo

Online Banking with Wells Fargo

Are you aware of all the Online Banking services we offer? We continue to add to and improve our online features to meet your needs with services such as Mobile Banking, Account Alerts, and My Spending Report and Budget Watch. Visit wells Fargo.com for more information on any of these services.

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wells Fargo.com or call the number above if you have questions or if you would like to add new services.

Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Rewards Program	<input type="checkbox"/>
Online Statements	<input type="checkbox"/>	Auto Transfer/Payment	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Debit Card	<input checked="" type="checkbox"/>
		Overdraft Service	<input type="checkbox"/>

Activity summary

Beginning balance on 5/5	\$1,220.99
Deposits/Additions	1,150.00
Withdrawals/Subtractions	- 2,258.03
Ending balance on 6/6	\$112.96

Account number: 7091505920

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

- Savings - 000002961476971

Wells Fargo® Preferred Checking

Account number: **7091505920** ■ June 7, 2012 - July 6, 2012 ■ Page 1 of 3



G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

Questions?

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1-800-TO-WELLS (1-800-869-3557)

TTY: 1-800-877-4833

En español: 1-877-727-2932

華語 1-800-288-2288 (6 am to 7 pm PT, M-F)

Online: wells Fargo.com

Write: Wells Fargo Bank, N.A. (114)
P.O. Box 6995
Portland, OR 97228-6995

You and Wells Fargo

Keep things simple. Online Statements duplicate your traditional paper bank statement and you can access your financial information 24 hours a day from anywhere you have access to the Internet. Reduce clutter and save the environment at the same time. Sign up for and view your Online Statements at wells Fargo.com.

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wells Fargo.com or call the number above if you have questions or if you would like to add new services.

Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Rewards Program	<input type="checkbox"/>
Online Statements	<input type="checkbox"/>	Auto Transfer/Payment	<input type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
		Overdraft Service	<input type="checkbox"/>

Activity summary

Beginning balance on 6/7	\$112.96
Deposits/Additions	23,839.55
Withdrawals/Subtractions	- 210.67
Ending balance on 7/6	\$23,741.84

Account number: **7091505920**

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

- Savings - 000002961476971

Wells Fargo® Preferred Checking

Account number: 7091505920 ■ July 7, 2012 - August 6, 2012 ■ Page 1 of 4

WELLS
FARGO

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

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Portland, OR 97228-6995

You and Wells Fargo

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Account options

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Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Rewards Program	<input type="checkbox"/>
Online Statements	<input type="checkbox"/>	Auto Transfer/Payment	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Debit Card	<input checked="" type="checkbox"/>
		Overdraft Service	<input type="checkbox"/>

Activity summary

Beginning balance on 7/7	\$23,741.84
Deposits/Additions	16,300.05
Withdrawals/Subtractions	- 30,523.23
Ending balance on 8/6	\$9,518.66

Account number: 7091505920

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

- Savings - 000002961476971

Wells Fargo® Preferred Checking

Account number: **7091505920** ■ November 7, 2012 - December 6, 2012 ■ Page 1 of 4

WELLS
FARGO

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

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P.O. Box 6995
Portland, OR 97228-6995

You and Wells Fargo

Getting ready for tax season can be a hassle! Creating a checklist, and preparing in advance will set you up for a successful meeting with your tax preparer. Remember to bring your deposit routing and account number when preparing your taxes and you may be able to take advantage of using direct deposit for your tax refund into one of your Wells Fargo checking or savings accounts.

Account options

A check mark in the box indicates you have these convenient services with your account. Go to wells Fargo.com or call the number above if you have questions or if you would like to add new services.

Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Auto Transfer/Payment	<input checked="" type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Overdraft Service	<input type="checkbox"/>

Activity summary

Beginning balance on 11/7	\$2,719.42
Deposits/Additions	16,100.02
Withdrawals/Subtractions	- 18,655.99
Ending balance on 12/6	\$163.45

Account number: **7091505920**

G REZA ZANDIAN JAZI
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NILOOFAR FOUGHANI ZANDIAN

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

■ Savings - 000002961476971

Wells Fargo® Preferred Checking

Account number: **7091505920** ■ August 7, 2013 - September 6, 2013 ■ Page 1 of 3

WELLS
FARGO

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Portland, OR 97228-6995

You and Wells Fargo

Thank you for being a loyal Wells Fargo customer. We value your trust in our company and look forward to continuing to serve you with your financial needs.

Account options

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Online Banking	<input checked="" type="checkbox"/>	Direct Deposit	<input type="checkbox"/>
Online Bill Pay	<input checked="" type="checkbox"/>	Auto Transfer/Payment	<input checked="" type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Overdraft Service	<input type="checkbox"/>

Activity summary

Beginning balance on 8/7	\$1,626.37
Deposits/Additions	1,800.00
Withdrawals/Subtractions	- 3,411.86
Ending balance on 9/6	\$14.51

Account number: **7091505920**

G REZA ZANDIAN JAZI
ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN

California account terms and conditions apply

For Direct Deposit and Automatic Payments use
Routing Number (RTN): 121042882

Overdraft Protection

Your account is linked to the following for Overdraft Protection:

■ Savings - 000002961476971

Wells Fargo® Preferred Checking

Account number: 7091505920 ■ January 8, 2014 - February 6, 2014 ■ Page 1 of 5



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ALBORZ ZANDIAN
NILOOFAR FOUGHANI ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

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TTY: 1-800-877-4833

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Online Bill Pay	<input checked="" type="checkbox"/>	Auto Transfer/Payment	<input checked="" type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>	Overdraft Protection	<input checked="" type="checkbox"/>
Mobile Banking	<input checked="" type="checkbox"/>	Debit Card	<input type="checkbox"/>
My Spending Report	<input checked="" type="checkbox"/>	Overdraft Service	<input type="checkbox"/>



IMPORTANT ACCOUNT INFORMATION

We want to let you know about an important upcoming change.

Effective April 7, 2014, the fee for depositing international items, such as foreign checks, drafts and money orders drawn on banks located outside the United States will be \$5. This fee will be charged per item and will apply whether the international item is in a foreign currency or U.S. dollars. Please note that international item fees do not apply to deposits of U.S. dollar items that are drawn on U.S. banks.

If you have questions, please contact your local banker, or call the phone number listed at the top of your statement.

G REZA ZANDIAN JAZI
Account No: 761-2359760



For 24-Hour Customer Service Call:
1-800-946-2626
We accept Telecommunications Relay Service
calls
Wells Fargo Online®: wells Fargo.com

See back for important information
about your account.

Please note that calling will not preserve your Billing
Rights. If you prefer to write, see back for address.

PERSONAL LINE OF CREDIT STATEMENT

ACCOUNT SUMMARIES

CREDIT LINE SUMMARY		ACCOUNT ACTIVITY SUMMARY		PAYMENT INFORMATION	
Credit Limit	\$9,900.00	Previous Balance	\$8,588.78	New Balance	\$8,568.76
Available Credit	\$1,331.00	Payments/Credits	-\$8,600.00	Current Due	\$152.00
Statement Closing Date	March 20, 2012	Advances/Other Activity	\$8,500.00	Payment Due Date	April 14, 2012
		Fees Charged	\$0.00		
		Interest Charged	\$79.98		
		New Balance	\$8,568.76		

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional advances on this account and each month you pay:	You will pay off the balance shown on this statement in about:	And you will end up paying an estimated total of:
Only the minimum payment	25 years	\$18,054
\$267	3 years	\$10,320 (Savings = \$7,734)

If you would like information about credit counseling services, refer to www.usdoj.gov/ust/ea/bapcpa/ccda/cc_approved.htm or call 877-285-2108.

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay up to a \$25.00 late fee. Your Annual Percentage Rate (APR) may be increased up to the Penalty APR of 23.99%.

FOR YOUR ATTENTION

This is a reminder that the customer service number and your account number changed with the first billing statement you received on or after January 15, 2012. Your new account number appears at the top of this statement. If you have not started to use your new account number, please begin to do so immediately for all transactions. For any questions related to your account, please call the new servicing number of 1-800-946-2626.

\$0 - \$152.00 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 04/14/12. THE AUTOMATIC PAYMENT AMOUNT WILL BE REDUCED BY ALL PAYMENTS POSTED ON OR BEFORE THIS DATE.

TRANSACTIONS

Post Date	Trans Date	Reference	Description	Amount
03/01	03/01	P908100EE0A8SWQ3H	ONLINE PAYMENT	-\$8,600.00
03/05	03/05	P908100EH0A8ZVXK9	ONLINE ADVANCE	\$8,000.00
03/14	03/14	P908100EV0A8P9TL9	ONLINE ADVANCE	\$500.00
FEES				
TOTAL FEES FOR THIS PERIOD				\$0.00
INTEREST CHARGED				
03/20	03/20		Interest Charged on Advances	\$79.98
TOTAL INTEREST FOR THIS PERIOD				\$79.98

2012 Totals Year-to-Date	
Total fees charged in 2012	\$0.00
Total interest charged in 2012	\$164.20

Notice: See reverse side for important information about your account.

5596 YSG 1 7 13 120320 0 PAGE 1 of 2 10 9081 7610 P602 01BB5596

Detach and mail with check payable to Wells Fargo.

Print address/phone changes below:

Home ()

Account No. 761-2359760
Payment Due Date April 14, 2012
New Balance \$8,568.76
Current Due \$152.00

Your automatic payment will be processed on 04/14/12.

076123597600000152000000856876

WELLS FARGO CARD SERVICES YSG
PO BOX 30097 16
LOS ANGELES CA 90030-0097

G REZA ZANDIAN JAZI
PO BOX 927674
SAN DIEGO CA 92192-7674

G REZA ZANDIAN JAZI
Account No: 761-2359760



For 24-Hour Customer Service Call:
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calls.
Wells Fargo Online®: wells Fargo.com

See back for important information
about your account.

Please note that calling will not preserve your Billing
Rights. If you prefer to write, see back for address.

PERSONAL LINE OF CREDIT STATEMENT

ACCOUNT SUMMARIES

CREDIT LINE SUMMARY		ACCOUNT ACTIVITY SUMMARY		PAYMENT INFORMATION	
Credit Limit	\$9,900.00	Previous Balance	\$8,568.76	New Balance	\$8,702.53
Available Credit	\$1,197.00	Payments/Credits	-\$1,060.00	Current Due	\$166.00
Statement Closing Date	April 19, 2012	Advances/Other Activity	\$1,100.00	Payment Due Date	May 14, 2012
		Fees Charged	\$0.00		
		Interest Charged	\$93.77		
		New Balance	\$8,702.53		

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional advances on this account and each month you pay:	You will pay off the balance shown on this statement in about:	And you will end up paying an estimated total of:
Only the minimum payment	25 years	\$18,345
\$291	3 years	\$10,481 (Savings = \$7,864)

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay up to a \$25.00 late fee.

Your Annual Percentage Rate (APR) may be increased up to the Penalty APR of 23.99%.

If you would like information about credit counseling services, refer to www.usdoj.gov/ust/eo/bapcpa/code/cc_approved.htm or call 877-285-2108.

FOR YOUR ATTENTION

This is a reminder that the customer service number and your account number changed with the first billing statement you received on or after January 15, 2012. Your new account number appears at the top of this statement. If you have not started to use your new account number, please begin to do so immediately for all transactions. For any questions related to your account, please call the new servicing number of 1-800-946-2626.

\$0 - \$166.00 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 05/14/12. THE AUTOMATIC PAYMENT AMOUNT WILL BE REDUCED BY ALL PAYMENTS POSTED ON OR BEFORE THIS DATE.

TRANSACTIONS

Post Date	Trans Date	Reference	Description	Amount
03/24	03/24	P908100F50A87D8MW	ONLINE ADVANCE	\$500.00
03/24	03/24	P908100F50A87D830	ONLINE ADVANCE	\$300.00
04/09	04/09	P908100FM0A7SKHH9	BRANCH PAYMENT CASH REF# DZEFZ5PYLB	-\$160.00
04/16	04/16	P908100FV0A912A41	ONLINE ADVANCE	\$300.00
04/17	04/17	P908100FX0A8SRPFG	ONLINE PAYMENT	-\$900.00
FEES				
TOTAL FEES FOR THIS PERIOD				\$0.00
INTEREST CHARGED				
04/19	04/19		Interest Charged on Advances	\$93.77
TOTAL INTEREST FOR THIS PERIOD				\$93.77

2012 Totals Year-to-Date	
Total fees charged in 2012	\$0.00
Total interest charged in 2012	\$257.97

Notice: See reverse side for important information about your account.

5596 YSG 1 7 13 120419 0 PAGE 1 of 2 10 9081 7610 P602 01BB5596

Detach and mail with check payable to Wells Fargo.

Print address/phone changes below:

Home () _____

Account No. 761-2359760
Payment Due Date May 14, 2012
New Balance \$8,702.53
Current Due \$166.00

Your automatic payment will be processed on 05/14/12.

0761235976000000166000000870253

WELLS FARGO CARD SERVICES
PO BOX 30097 YSG
LOS ANGELES CA 90030-0097 16

G REZA ZANDIAN JAZI
PO BOX 927674
SAN DIEGO CA 92192-7674

G REZA ZANDIAN JAZI
Account No. 761-2359760



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We accept Telecommunications Relay Service
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Wells Fargo Online®: wells Fargo.com

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Please note that calling will not preserve your Billing
Rights. If you prefer to write, see back for address.

PERSONAL LINE OF CREDIT STATEMENT

ACCOUNT SUMMARIES

CREDIT LINE SUMMARY		ACCOUNT ACTIVITY SUMMARY		PAYMENT INFORMATION	
Credit Limit	\$9,900.00	Previous Balance	\$8,702.53	New Balance	\$7,889.60
Available Credit	\$2,010.00	Payments/Credits	-\$1,400.00	Minimum Payment Due	\$153.00
Statement Closing Date	May 20, 2012	Advances/Other Activity	\$500.00	Payment Due Date	June 14, 2012
		Fees Charged	\$0.00		
		Interest Charged	\$87.07		
		New Balance	\$7,889.60		

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional advances on this account and each month you pay:	You will pay off the balance shown on this statement in about:	And you will end up paying an estimated total of:
Only the minimum payment	24 years	\$16,518
\$264	3 years	\$9,502 (Savings = \$7,016)

If you would like information about credit counseling services, refer to:
www.usdoj.gov/ust/ea/bapcpa/ccde/cc_approved.htm or call 877-285-2108.

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay up to a \$25.00 late fee.

FOR YOUR ATTENTION

IMPORTANT: The customer service number and your account number changed on January 15, 2012 and appear at the top of this statement. If you have not started to use your new account number, please do so by July 31, 2012 for all transactions. For any questions related to your account, please call the new servicing number of 1-800-946-2626.

\$0 - \$153.00 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED AS YOUR AUTOMATIC PAYMENT ON 06/14/12. THE AUTOMATIC PAYMENT AMOUNT WILL BE REDUCED BY ALL PAYMENTS POSTED ON OR BEFORE THIS DATE.

TRANSACTIONS

Post Date	Trans Date	Reference	Description	Amount
04/22	04/22	P908100G20A8GYRVE	ONLINE ADVANCE	\$500.00
04/22	04/22	P908100G20A8GY5KH	ONLINE PAYMENT	-\$200.00
05/01	05/01	P908100GB0A7SKJ7S	BRANCH PAYMENT CASH REF# DZEFZC3JCV	-\$1,200.00
FEES				
TOTAL FEES FOR THIS PERIOD				\$0.00
INTEREST CHARGED				
05/20	05/20		Interest Charged on Advances	\$87.07
TOTAL INTEREST FOR THIS PERIOD				\$87.07

2012 Totals Year-to-Date	
Total fees charged in 2012	\$0.00
Total interest charged in 2012	\$345.04

Notice: See reverse side for important information about your account.
5596 YSG 1 7 13 120520 0 PAGE 1 of 2 10 9081 7610 P602 01BB5596

Detach and mail with check payable to Wells Fargo.

Print address/phone changes below:

Home () _____

Account No. 761-2359760
New Balance \$7,889.60
Minimum Payment Due \$153.00
Payment Due Date June 14, 2012

Your automatic payment will be processed on 06/14/12.

0761235976000000153000000788960

WELLS FARGO CARD SERVICES YSG
PO BOX 30097 16
LOS ANGELES CA 90030-0097

G REZA ZANDIAN JAZI
PO BOX 927674
SAN DIEGO CA 92192-7674

G REZA ZANDIAN JAZI
Account No. 761-2359760



For 24-Hour Customer Service Call:
1-800-946-2626
We accept Telecommunications Relay Service
calls.
Wells Fargo Online®: wells Fargo.com

See back for important information
about your account.

Please note that calling will not preserve your Billing
Rights. If you prefer to write, see back for address.

PERSONAL LINE OF CREDIT STATEMENT

ACCOUNT SUMMARIES

CREDIT LINE SUMMARY		ACCOUNT ACTIVITY SUMMARY		PAYMENT INFORMATION	
Credit Limit	\$9,900.00	Previous Balance	\$9,975.02	Credit Balance	-\$39.09
Available Credit	\$9,900.00	Payments/Credits	-\$10,174.98	Payment Due Date	August 14, 2012
Statement Closing Date	July 20, 2012	Advances/Other Activity	\$99.98		No Payment Due
		Fees Charged	\$0.00		
		Interest Charged	\$60.89		
		Credit Balance	-\$39.09		

FOR YOUR ATTENTION

PLEASE DO NOT PAY, AS OF THIS STATEMENT DATE YOUR ACCOUNT HAS A CREDIT BALANCE.

TRANSACTIONS

Post Date	Trans Date	Reference	Description	Amount
06/28	06/28	P908100J40A8P29BH	ONLINE PAYMENT	-\$80.00
07/08	07/08	P908100JF0A8R2KKB	ONLINE PAYMENT	-\$9,995.00
07/17	07/17	P908100JR0A7V40WN	ONLINE ADVANCE	\$99.98
07/17	07/17	P908100JR0A7V4M1Z	ONLINE PAYMENT	-\$99.98
FEES				
TOTAL FEES FOR THIS PERIOD				\$0.00
INTEREST CHARGED				
07/20	07/20		Interest Charged on Advances	\$60.89
TOTAL INTEREST FOR THIS PERIOD				\$60.89

2012 Totals Year-to-Date	
Total fees charged in 2012	\$0.00
Total interest charged in 2012	\$501.35

INTEREST CHARGE CALCULATION

YOU MAY PAY YOUR BALANCE IN FULL AT ANY TIME.

YOUR ANNUAL PERCENTAGE RATE (APR) IS THE ANNUAL INTEREST RATE ON YOUR ACCOUNT.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charged
ADVANCES	12.50% (v)	\$5,736.54	\$60.89
OTHER	12.50% (v)	\$0.00	\$0.00
(v) - Variable			
Days in Billing Cycle 31			

Notice: See reverse side for important information about your account.
5596 YSG 1 7 13 120720 0 N PAGE 1 of 1 10 9081 7610 P602 01BB5596

Detach and mail with check payable to Wells Fargo.

Print address/phone changes below:

Home ()

Account No. 761-2359760
Credit Balance -\$39.09
Payment Due Date August 14, 2012
No Payment Due

Payment Enclosed \$

07612359760000000000000000000000

WELLS FARGO CARD SERVICES YSG
PO BOX 30097 16
LOS ANGELES CA 90030-0097

G REZA ZANDIAN JAZI
PO BOX 927674
SAN DIEGO CA 92192-7674

G REZA ZANDIAN JAZI
Account No. 761-2359760



For 24-Hour Customer Service Call:
1-800-946-2626
We accept Telecommunications Relay Service
calls
Wells Fargo Online®: wells Fargo.com

See back for important information
about your account.

Please note that calling will not preserve your Billing
Rights. If you prefer to write, see back for address.

PERSONAL LINE OF CREDIT STATEMENT

ACCOUNT SUMMARIES

CREDIT LINE SUMMARY		ACCOUNT ACTIVITY SUMMARY		PAYMENT INFORMATION	
Credit Limit	\$8,500.00	Previous Balance	\$8,070.47	New Balance	\$8,177.51
Available Credit	\$322.00	Payments/Credits	\$0.00	Past Due	\$151.00
Statement Closing Date	July 19, 2013	Advances/Other Activity	\$0.00	Minimum Payment Due	\$326.00
		Fees Charged	\$25.00	(includes Past Due amount)	
		Interest Charged	\$82.04	Payment Due Date	August 14, 2013
		New Balance	\$8,177.51		

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional advances on this account and each month you pay:	You will pay off the balance shown on this statement in about:	And you will end up paying an estimated total of:
Only the minimum payment	24 years	\$16,964
\$273	3 years	\$9,844 (Savings = \$7,120)

If you would like information about credit counseling services, refer to:
www.usdoj.gov/ust/ea/bapcpa/ccode/cc_approved.htm or call 877-285-2108.

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay up to a \$25.00 late fee.

Payoff Request Information: Balances include unpaid interest charges, and other unpaid fees and charges. The New Balance owed is not a payoff amount. Please, contact Customer Service at 1-800-946-2626 for an accurate payoff.

FOR YOUR ATTENTION

Notice to Cosigners in California, Illinois and Michigan: If you are a cosigner on this account, state law requires us to notify you that the primary obligor has become delinquent or defaulted on the obligation and that you are jointly responsible for payment. Accordingly, you have an obligation to pay the amount due or make arrangements for payment of the obligation. If you are a cosigner on this account and an Illinois resident, Illinois law requires us to also notify you that you have fifteen days from the date this notice was sent to pay the amount due to make arrangements for payments of the obligation. Notice to Michigan customers: Please arrange for payment of the Total Amount Due within thirty (30) days of the date of this notice.

YOUR ACCOUNT IS PAST DUE. PLEASE REMIT PAST DUE AMOUNT AS SOON AS POSSIBLE OR CALL 1-800-241-0028. THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

TRANSACTIONS

Post Date	Trans Date	Reference	Description	Amount
FEES				
07/14	07/14		LATE FEE	\$25.00
			TOTAL FEES FOR THIS PERIOD	\$25.00
INTEREST CHARGED				
07/19	07/19		Interest Charged on Advances	\$82.04
			TOTAL INTEREST FOR THIS PERIOD	\$82.04

2013 Totals Year-to-Date	
Total fees charged in 2013	\$75.00
Total interest charged in 2013	\$585.90

Notice: See reverse side for important information about your account.

5596 Y86 1 7 13 130719 0 D PAGE 1 of 2 10 9081 7610 P602 0185596

Detach and mail with check payable to Wells Fargo.

Print address/phone changes below:

Home ()

Account No. 761-2359760
New Balance \$8,177.51
Past Due \$151.00
Minimum Payment Due \$326.00
(includes Past Due amount)
Payment Due Date August 14, 2013

0761235976000000326000000817751

Payment Enclosed \$

WELLS FARGO CARD SERVICES YSG
PO BOX 30097 16
LOS ANGELES CA 90030-0097

G REZA ZANDIAN JAZI
PO BOX 927674
SAN DIEGO CA 92192-7674

G REZA ZANDIAN JAZI
Account No. 761-2359760



For 24-Hour Customer Service Call:
1-800-946-2626
We accept Telecommunications Relay Service
calls.
Wells Fargo Online®: wells Fargo.com

See back for important information
about your account.

Please note that calling will not preserve your Billing
Rights. If you prefer to write, see back for address.

PERSONAL LINE OF CREDIT STATEMENT

ACCOUNT SUMMARIES

CREDIT LINE SUMMARY		ACCOUNT ACTIVITY SUMMARY		PAYMENT INFORMATION	
Credit Limit	\$8,500.00	Previous Balance	\$7,671.10	New Balance	\$7,443.34
Available Credit	\$1,056.00	Payments/Credits	-\$299.00	Minimum Payment Due	\$134.00
Statement Closing Date	February 17, 2014	Advances/Other Activity	\$0.00	Payment Due Date	March 14, 2014
		Fees Charged	\$0.00		
		Interest Charged	\$71.24		
		New Balance	\$7,443.34		

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional advances on this account and each month you pay:	You will pay off the balance shown on this statement in about:	And you will end up paying an estimated total of:
Only the minimum payment	23 years	\$15,540
\$249	3 years	\$8,965 (Savings = \$6,575)

If you would like information about credit counseling services, refer to: www.usdoj.gov/ust/ea/bapcpa/code/cc_approved.htm or call 877-285-2108.

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay up to a \$25.00 late fee.

Payoff Request Information: Balances include unpaid interest charges, and other unpaid fees and charges. The New Balance owed is not a payoff amount. Please, contact Customer Service at 1-800-946-2626 for an accurate payoff.

TRANSACTIONS

Post Date	Trans Date	Reference	Description	Amount
02/03	02/03	P908100DK0A92SSAS	ONLINE PAYMENT	-\$299.00
FEES				
TOTAL FEES FOR THIS PERIOD				\$0.00
INTEREST CHARGED				
02/17	02/17		Interest Charged on Advances	\$71.24
TOTAL INTEREST FOR THIS PERIOD				\$71.24

2014 Totals Year-to-Date	
Total fees charged in 2014	\$25.00
Total interest charged in 2014	\$150.84

INTEREST CHARGE CALCULATION

YOU MAY PAY YOUR BALANCE IN FULL AT ANY TIME.

YOUR ANNUAL PERCENTAGE RATE (APR) IS THE ANNUAL INTEREST RATE ON YOUR ACCOUNT.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charged
ADVANCES	12.50% (v)	\$7,431.36	\$71.24

Notice: See reverse side for important information about your account.
5596 YSG 1 7 13 140217 0 PAGE 1 of 2 1 0 9081 7610 P602 01BB5596

Detach and mail with check payable to Wells Fargo.

Print address/phone changes below:

Home ()

Account No. 761-2359760
New Balance \$7,443.34
Minimum Payment Due \$134.00
Payment Due Date March 14, 2014

Payment Enclosed \$

0761235976000000134000000744334

WELLS FARGO CARD SERVICES
PO BOX 30097
LOS ANGELES CA 90030-0097
YSG 16

G REZA ZANDIAN JAZI
PO BOX 927674
SAN DIEGO CA 92192-7674

WELLS FARGO



VISA

Account Number
Statement Billing Period
Page 1 of 2

Ending in 7470
05/11/2013 to 06/10/2013

Balance Summary

Previous Balance	\$3,824.07
- Payments	\$108.07
- Other Credits	\$10.31
+ Cash Advances	\$0.00
+ Purchases, Balance Transfers & Other Charges	\$0.00
+ Fees Charged	\$0.00
+ Interest Charged	\$47.14
= New Balance	\$3,752.83
Total Credit Limit	\$3,800

24-Hour Customer Service: 1-800-642-4720
 TTY for Hearing/Speech Impaired: 1-800-419-2265
 Outside the US Call Collect: 1-925-825-7600
 Wells Fargo Online®: wells Fargo.com

Send General Inquiries To:
 PO Box 10347, Des Moines IA, 50306-0347

Total Available Credit \$47

Payment Information

New Balance	\$3,752.83
Minimum Payment	\$85.00
Payment Due Date	07/05/2013

Send Payments To:
 PO Box 30086, Los Angeles CA, 90030-0086

Late Payment Warning: If we do not receive your Minimum Payment by 07/05/2013, you may have to pay a late fee up to \$35.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay ...	You will pay off the New Balance shown on this statement in about ...	And you will end up paying an estimated total of ...
Only the minimum payment	19 years	\$7,676
\$129	3 years	\$4,660 (Savings of \$3,016)

If you would like information about credit counseling services, refer to www.usdoj.gov/ust/ea/bapcpa/ccde/cc_approved.htm or call 1-877-285-2108.

Important Information

IMPORTANT INFORMATION REGARDING YOUR REWARDS ACCOUNT

WELLS FARGO REWARDS PROGRAM FOR CREDIT CARD TERMS AND CONDITIONS UPDATE:
 YOUR CURRENT TERMS AND CONDITIONS NAME AFFINION LOYALTY GROUP ("ALG") AS THE PROGRAM ADMINISTRATOR.
 EFFECTIVE MARCH 19, 2013 ALG CHANGED ITS NAME TO CONNEXIONS LOYALTY.
 ALL REFERENCES IN YOUR TERMS AND CONDITIONS REGARDING ALG SHOULD BE DEEMED TO NOW REFER TO CONNEXIONS LOYALTY.
 IF YOU HAVE ANY QUESTIONS, PLEASE VISIT WELLSFARGOREWARDS.COM OR CALL THE REWARDS CUSTOMER SERVICE CENTER AT 1-877-517-1358.

Wells Fargo Rewards® Program Summary

Rewards Previous Balance:	70,156
Points Earned:	11-
Earn More Mail® Bonus Points:	0
Points Redeemed:	0
Total Available Points:	70,145

We offer more rewards choices so you can choose a reward that suits your style. You'll find gift cards, cash rewards, travel, merchandise and even charitable contributions.
 Track your points balance or get more information at www.WellsFargoRewards.com or by calling 1-877-517-1358.

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION ABOUT YOUR ACCOUNT

Continued →

5596 YKG 1 7 6 130610 0 PAGE 1 of 2 1 0 5583 2000 R049 01DP5596

Detach and mail with check payable to Wells Fargo

Account Number 4465 4203 9293 7470
 New Balance \$3,752.83
 Minimum Payment \$85.00
 Payment Due Date 07/05/2013

00850003752830044654203929374704

YKG 4

Amount Enclosed



WELLS FARGO CARD SERVICES
 PO BOX 30086
 LOS ANGELES CA 90030-0086

G R JAZI
 PO BOX 927674
 SAN DIEGO CA 92192-7674

WELLS FARGO



VISA

Account Number
Statement Billing Period
Page 1 of 4

Ending in 7470
03/12/2012 to 04/10/2012

Balance Summary

Previous Balance	\$1,029.47
- Payments	\$358.55
- Other Credits	\$99.80
+ Cash Advances	\$0.00
+ Purchases, Balance Transfers & Other Charges	\$2,160.60
+ Fees Charged	\$15.00
+ Interest Charged	\$26.43
= New Balance	\$2,773.15
Total Credit Limit	\$2,900

24-Hour Customer Service: 1-800-642-4720
 TTY for Hearing/Speech Impaired: 1-800-419-2265
 Outside the US Call Collect: 1-925-825-7600
 Wells Fargo Online®: wellsfargo.com

Send General Inquiries To:
 PO Box 10347, Des Moines IA, 50306-0347

Total Available Credit \$126

Payment Information

New Balance	\$2,773.15
Minimum Payment	\$70.00
Payment Due Date	05/05/2012

Send Payments To:
 PO Box 30086, Los Angeles CA, 90030-0086

Late Payment Warning: If we do not receive your Minimum Payment by 05/05/2012, you may have to pay a late fee up to \$35.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay ...	You will pay off the New Balance shown on this statement in about ...	And you will end up paying an estimated total of ...
Only the minimum payment	17 years	\$5,520
\$96	3 years	\$3,444 (Savings of \$2,076)

If you would like information about credit counseling services, refer to www.usdoj.gov/ust/eo/bapcpa/ccde/cc_approved.htm or call 1-877-285-2108.

Wells Fargo Rewards® Program Summary

Rewards Previous Balance:	49,650
Points Earned:	2,061
Earn More Mail® Bonus Points:	0
Total Available Points:	51,711

CONGRATULATIONS!

You have 51,711 Wells Fargo Rewards® points. For 50,000 points you can redeem for a \$500 cash reward or other exciting rewards including airfare with no blackout dates, brand-name merchandise, and charitable contributions.

These are just a few of our many options available. To see all your choices or to redeem your points, sign on to www.WellsFargoRewards.com or call 1-877-517-1358.

We offer more rewards choices so you can choose a reward that suits your style. You'll find gift cards, cash rewards, travel, merchandise and even charitable contributions.

Track your points balance or get more information at www.WellsFargoRewards.com or by calling 1-877-517-1358.

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION ABOUT YOUR ACCOUNT

Continued

5596 YKG 1 7 6 120410 0 PAGE 1 of 4 10 5583 2000 R049 01DP5596

Detach and mail with check payable to Wells Fargo

Account Number 4465 4203 9293 7470
 New Balance \$2,773.15
 Minimum Payment \$70.00
 Payment Due Date 05/05/2012

01000002773150044654203929374704

YKG 4

Amount Enclosed



WELLS FARGO CARD SERVICES
 PO BOX 30086
 LOS ANGELES CA 90030-0086

G R JAZI
 PO BOX 927674
 SAN DIEGO CA 92192-7674





CLERK OF THE COURT

1 NPNR
2 REZA ZANDIAN
3 6, rue Edouard Fournier
4 75116 Paris, France
5 Pro Per Appellant

DISTRICT COURT
CLARK COUNTY, NEVADA

6 GHOLAMREZA ZANDIAN JAZI, also
7 known as REZA ZANDIAN, individually,
8
9 Plaintiff,

CASE NO.: A-11-635430-C
DEPT. NO.: IV

10 v.

11 FIRST AMERICAN TITLE COMPANY, a
12 Nevada business entity; JOHNSON SPRING
13 WATER COMPANY, LLC, formerly known
14 as BIG SPRING RANCH, LLC, a Nevada
15 Limited Liability Company, FRED SADRI,
16 Trustee of the Star Living Trust, RAY
17 KOROGHLI, individually, and ELIAS
18 ABRISHAMI, individually,

19 Defendants.

20 **AND ALL RELATED COUNTERCLAIMS**
21 **AND THIRD-PARTY CLAIMS**

22 1334.024072-td

NOTICE OF POSTING COST BOND

23 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

24 PLEASE TAKE NOTICE that with the filing of the Notice of Appeal herein, Plaintiff is
25 posting Five Hundred Dollars (\$500.00) as cost bond pursuant to NRAP 7

26 DATED this 15TH day of March, 2013.

27 BY:

28 
REZA ZANDIAN
6, rue Edouard Fournier
75116 Paris, France
Pro Per Appellant

CERTIFICATE OF MAILING


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I HEREBY CERTIFY that on the ___ day March, 2013, I served a copy of the above and foregoing NOTICE OF POSTING COST BOND, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully prepaid addressed to:

Stanley W. Parry
100 North City Parkway, Ste. 1750
Las Vegas, Nevada 89106

Elias Abrishami
P.O. Box 10476
Beverly Hills, California 90213

Ryan E. Johnson, Esq.
Watson & Rounds
10000 W. Charleston Blvd. Ste. 240
Las Vegas, Nevada 89135



OFFICIAL RECEIPT

District Court Clerk of the Court 200 Lewis Ave, 3rd Floor Las Vegas, NV 89101

Payor
John Peter Lee

Receipt No.
2013-33253-CCCLK

Transaction Date
03/19/2013

Description Amount Paid

On Behalf Of Jazi, Gholamreza Zandian
A-11-835430-C
Gholamreza Jazi, Plaintiff(s) vs. First American Title Company, Defendant(s)
APPEAL BOND

APPEAL BOND 500.00
SUBTOTAL 500.00

PAYMENT TOTAL **500.00**

Check (Ref #40673) Tendered 500.00
Total Tendered 500.00
Change 0.00

03/19/2013
10:56 AM

Cashier
Station AIKO

Audit
31119583

OFFICIAL RECEIPT

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,

Appellant,

vs.

JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY
KNOWN AS BIG SPRING RANCH,
LLC, A NEVADA LIMITED
LIABILITY COMPANY; FRED SADRI,
TRUSTEE OF THE STAR LIVING
TRUST; RAY KOROGHLI AND ELIAS
ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court No. A635430
Due Date: April 5, 2013

CIVIL PROPER PERSON
TRANSCRIPT REQUEST FORM

Gholamreza Zandian Jazi, A/K/A
Reza Zandian
6, rue Edouard Fournier
75116 Paris, France
Appellant in Proper Person

Appellant

Ryan E. Johnson/Watson Rounds
10000 W. Charleston Blvd., Ste 240
Las Vegas, NV 89134
Johnson Spring Water Company,
LLC F/K/A Big Spring Ranch,
LLC
Fred Sadri, Trustee of the Star
Living Trust

Stanley W. Parry/Ballard Spahr
Andrews & Ingersoll
Ray Koroghli

Elias Abrishami
PO Box 10476
Beverly Hills CA 90213-4018:
Respondent in Proper Person

Respondents

1 NPNR
2 REZA ZANDIAN
3 6, rue Edouard Fournier
4 75116 Paris, France
5 Pro Per Appellant

DISTRICT COURT
CLARK COUNTY, NEVADA

6 GHOLAMREZA ZANDIAN JAZI, also
7 known as REZA ZANDIAN, individually,

CASE NO.: A-11-635430-C
DEPT. NO.: IV

8 Plaintiff,

9 v.

10 FIRST AMERICAN TITLE COMPANY, a
11 Nevada business entity; JOHNSON SPRING
12 WATER COMPANY, LLC, formerly known
13 as BIG SPRING RANCH, LLC, a Nevada
14 Limited Liability Company, FRED SADRI,
15 Trustee of the Star Living Trust, RAY
16 KOROGHLI, individually, and ELIAS
17 ABRISHAMI, individually,

18 Defendants.

19 AND ALL RELATED COUNTERCLAIMS
20 AND THIRD-PARTY CLAIMS

21 1334.024072-td

NOTICE OF POSTING COST BOND

22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that with the filing of the Notice of Appeal herein, Plaintiff is
24 posting Five Hundred Dollars (\$500.00) as cost bond pursuant to NRAP 7.

25 DATED this ___ day of March, 2013.

26 BY: _____

27 REZA ZANDIAN
28 6, rue Edouard Fournier
75116 Paris, France
Pro Per Appellant

CERTIFICATE OF MAILING

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I HEREBY CERTIFY that on the ___ day March, 2013, I served a copy of the above and foregoing NOTICE OF POSTING COST BOND, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully prepaid addressed to:

Stanley W. Parry
100 North City Parkway, Ste. 1750
Las Vegas, Nevada 89106

Elias Abrishami
P.O. Box 10476
Beverly Hills, California 90213

Ryan E. Johnson, Esq.
Watson & Rounds
10000 W. Charleston Blvd. Ste. 240
Las Vegas, Nevada 89135



IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF: GOLD CANYON
DEVELOPMENT, LLC, A NEVADA
LIMITED LIABILITY COMPANY,

No. 61393

REZA ZANDIAN,

Appellant,


vs.

ELIAS ABRISHAMI; AND RAFI
ABRISHAMI,

Respondents.

FILED

MAY 23 2013

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK

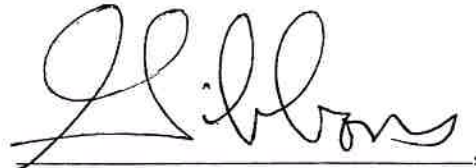
ORDER DISMISSING APPEAL AS ABANDONED

This court previously granted an unopposed motion to withdraw as attorney of record filed by former counsel for appellant. As cause for that motion, counsel cited to appellant's "lack of communication with [counsel's] office." Counsel provided this court with appellant's last known address. In our order granting that motion, we directed appellant to retain new counsel or to inform this court in writing if he would not be retaining new counsel. The copy of the order that was mailed to appellant was returned to this court by the United States Postal Service and marked as "UNABLE TO FORWARD."

Appellant has not provided counsel or this court with a valid mailing address or other contact information, and has not otherwise contacted this court. Thus it appears that appellant has

abandoned this appeal. Accordingly, we dismiss this appeal as abandoned.

It is so ORDERED.


Gibbons J.


Douglas J.


Saitta J.

cc: Hon. James E. Wilson, District Judge
Robert L. Eisenberg, Settlement Judge
John Peter Lee, Ltd.
Reza Zandian ✓
J.M. Clouser & Associates, Ltd.
Carson City Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF: GOLD CANYON
DEVELOPMENT, LLC, A NEVADA LIMITED
LIABILITY COMPANY,

Supreme Court No. 61393
District Court Case No. 11OC004151B

REZA ZANDIAN,
Appellant,
vs.
ELIAS ABRISHAMI; AND RAFI ABRISHAMI,
Respondents.

REMITTITUR

TO: Alan Glover, Carson City Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: June 17, 2013

Tracie Lindeman, Clerk of Court

By: Rory Wunsch
Deputy Clerk

cc (without enclosures):

Hon. James E. Wilson, District Judge
Reza Zandian
J.M. Clouser & Associates, Ltd./Justin M. Clouser

RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on _____.

District Court Clerk

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

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,

vs.

JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839

District Court Case No. A635430

RECEIPT FOR DOCUMENTS

TO: Gholamreza Zandian Jazi A.K.A Reza Zandian
Watson Rounds/Ryan E. Johnson
Ballard Spahr Andrews & Ingersoll, LLP/Stanley W. Parry
Elias Abrishami
Steven D. Grierson, Eighth District Court Clerk

You are hereby notified that the Clerk of the Supreme Court has received and/or filed the following:

03/21/2013	Filing fee due for Appeal. Filing fee will be forwarded by the District Court.
03/21/2013	Filed Notice of Appeal/Proper Person Pilot Program. Filed certified copy of proper person notice of appeal. (Pilot program civil appeals order and documents mailed to proper person appellant.)

DATE: March 21, 2013

Tracie Lindeman, Clerk of Court
rw

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,

Appellant,

vs.

JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY
KNOWN AS BIG SPRING RANCH,
LLC, A NEVADA LIMITED
LIABILITY COMPANY; FRED SADRI,
TRUSTEE OF THE STAR LIVING
TRUST; RAY KOROGHLI AND ELIAS
ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court No. A635430
Due Date: April 30, 2013

CIVIL PROPER PERSON APPEAL STATEMENT

*Gholamreza Zandian Jazi, A/K/A
Reza Zandian*

6, rue Edouard Fournier
75116 Paris, France
Appellant in Proper Person

Appellant

Ryan E. Johnson/Watson Rounds
10000 W. Charleston Blvd., Ste 240
Las Vegas, NV 89134

*Johnson Spring Water Company,
LLC F/K/A Big Spring Ranch,
LLC*

*Fred Sadri, Trustee of the Star
Living Trust*

Stanley W. Parry/Ballard Spahr
Andrews & Ingersoll

Ray Koroghli

Elias Abrishami

PO Box 10476
Beverly Hills CA 90213-4018:
Respondent in Proper Person

Respondents

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,
vs.
JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court Case No. A635430

REMITTITUR

TO: Steven D. Grierson, Eighth District Court Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: June 28, 2013

Tracie Lindeman, Clerk of Court

By: Rory Wunsch
Deputy Clerk

cc (without enclosures):

Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Ballard Spahr, LLP
Elias Abrishami

RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on _____.

District Court Clerk

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

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,

Supreme Court No. 62839
District Court Case No. A635430

vs.

JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

RECEIPT FOR DOCUMENTS

TO: Gholamreza Zandian Jazi
Reza Zandian ✓
Ballard Spahr Andrews & Ingersoll, LLP/Stanley W. Parry
Watson Rounds/Ryan E. Johnson
Elias Abrishami
Steven D. Grierson, Eighth District Court Clerk

You are hereby notified that the Clerk of the Supreme Court has received and/or filed
the following:

03/22/2013 Filing Fee Paid. \$250.00 from John Peter Lee. Check No. 40669.

DATE: March 22, 2013

Tracie Lindeman, Clerk of Court
sw

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,
vs.
JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court Case No. A635430

REMITTITUR

TO: Steven D. Grierson, Eighth District Court Clerk

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Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: June 28, 2013

Tracie Lindeman, Clerk of Court

By: Rory Wunsch
Deputy Clerk

cc (without enclosures):

Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Ballard Spahr, LLP
Elias Abrishami

RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on _____.

District Court Clerk

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

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,

vs.

JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court Case No. A635430

RECEIPT FOR DOCUMENTS

TO: Gholamreza Zandian Jazi ✓
Reza Zandian
Ballard Spahr Andrews & Ingersoll, LLP/Stanley W. Parry
Watson Rounds/Ryan E. Johnson
Elias Abrishami
Steven D. Grierson, Eighth District Court Clerk

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03/22/2013 Filing Fee Paid. \$250.00 from John Peter Lee. Check No. 40669.

DATE: March 22, 2013

Tracie Lindeman, Clerk of Court
sw

W

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,
Appellant,


vs.

JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY KNOWN
AS BIG SPRING RANCH, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE
OF THE STAR LIVING TRUST; RAY
KOROGHLI AND ELIAS ABRISHAMI,
INDIVIDUALLY,
Respondents.

No. 62839

FILED

JUN 03 2013

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK


ORDER DISMISSING APPEAL

When this appeal was docketed, this court gave proper person appellant 40 days to file and serve the proper person litigant forms. Those forms were due in this court by April 30, 2013. To date, appellant has failed to file the required forms or otherwise respond to this court's directive. Accordingly, we conclude that appellant has abandoned this appeal, and we

ORDER this appeal DISMISSED.


_____, J.
Gibbons


_____, J.
Douglas


_____, J.
Saitta

cc: Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Elias Abrishami
Ballard Spahr, LLP
Eighth District Court Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,
Appellant,
vs.
JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY KNOWN
AS BIG SPRING RANCH, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE
OF THE STAR LIVING TRUST; RAY
KOROGHLI AND ELIAS ABRISHAMI,
INDIVIDUALLY,
Respondents.

No. 62839

FILED

JUN 03 2013

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY Angela
DEPUTY CLERK

ORDER DISMISSING APPEAL

When this appeal was docketed, this court gave proper person appellant 40 days to file and serve the proper person litigant forms. Those forms were due in this court by April 30, 2013. To date, appellant has failed to file the required forms or otherwise respond to this court's directive. Accordingly, we conclude that appellant has abandoned this appeal, and we

ORDER this appeal DISMISSED.

Gibbons, J.
Gibbons

Douglas, J.
Douglas

Saitta, J.
Saitta

cc: Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Elias Abrishami
Ballard Spahr, LLP
Eighth District Court Clerk

VOS CONTACTS

Mon espace client
Pour gérer votre contrat et recevoir vos factures sur votre espace Client espaceclient.edf.com
Identifiant Internet : 3M7WETRD8

Pay M@gnifique
• Ma facture, mon contrat, mon dépannage et pour toute réclamation du 07 20 20 20 20 (appel non surtaxé)
• Mon Compte sur Serveur Vocal 24h/24 au 0 800 133 333 (N° vert pour payer votre facture par CB et transmettre votre relevé de compteur)

N° client : 6 093 892 796
• Mes Travaux de chauffage et d'isolation au 06 95 11 00 00 (0.06 € TTC/min hors surcoût éventuel selon opérateur)
du lundi au samedi de 8h à 21h
Dépannage Electricité : 06 729 760 79 (appel non surtaxé)

Pay Service
EDF SERVICE CLIENTS
75A 20012
41875 BLDIS CEDEX 3

Lieu de consommation :
SR 1
6 RUE EDOUARD FOURNIER
75116 PARIS

Titulaire du contrat
M. ZANDIAN JAZI GHOLAM REZA

Votre contrat
N° de client : 6 093 892 796
N° de compte : 4 02 4 004 833 996
(numéro à transmettre pour le règlement de vos factures)
Electricité "Tarif Bleu"
• Point de livraison (PDL) :
N° 07 456 610 633 121
• Puissance : 06 kVA

INFORMATIONS

Sur et Réglementation
Electricité : Suite aux décisions des pouvoirs publics, le C.S.P.E. évalue au 01/07/2012 et le tarif réglementé au 23/07/2012. Plus d'information sur <http://particuliers.edf.com>

Vous avez des questions ?
Pour plus d'informations, connectez-vous sur facture.edf.com



34228 46781 12972
1 - 71 - 34 - 816



M. ZANDIAN JAZI GHOLAM REZA
6 RUE EDOUARD FOURNIER
75116 PARIS

Votre facture du 11/12/2012 N° 29 446 065 195

Electricité "Tarif Bleu"	53,83 €
Consommation, abonnement et taxes	
Total Hors TVA	53,83 €
TVA	5,13 €

Détails au verso
Total TTC
58,96 €
Prélevé le
26/12/2012

Prochaine facture vers le 07/08/2013 - Prochain relevé vers le 07/08/2013

MODALITE DE PAIEMENT : PRELEVEMENT AUTOMATIQUE

Conformément à votre contrat et aux conditions particulières de vente de l'offre que vous avez souscrite, le montant de 58,96€ sera prélevé le 26/12/2012 sur le compte dont les coordonnées figurent ci-dessous :

Titulaire du compte : MR ZANDIAN
Nom de la banque : *****
Compte bancaire : **** * 00050958364 **

En cas de modification de référence de ce compte ou de contestation, merci de vous connecter à votre espace Client espaceclient.edf.com ou de contacter votre conseiller EDF.

AVIS D'IMPÔT 2012

TAXE D'HABITATION
votée et perçue par la commune
et divers organismes

CONTRIBUTION À L'AUDIOVISUEL PUBLIC
votée par le Parlement et versée aux entreprises
de l'audiovisuel public



DIRECTION GÉNÉRALE
DES FINANCES PUBLIQUES

CENTRE DES FINANCES PUBLIQUES
DE PARIS TSA 70001
17 RUE EDOUARD SAGU
93100 PARIS CEDEX 16

NOUVEAU N° DE RIB
RIB 12 75 824 7530 92
RIB 12 75 824 7530 92

M. OU MME ZANDIAN JINET
6 RUE EDOUARD FOURNIER
PARIS
75016 PARIS 16

Vos références		Votre situation	
Número fiscal:	19 75 393 067 438 11	Montant de votre taxe d'habitation:	4 351,00 €
Número FIR:	757 54 82 5894147789 3	Montant de votre contribution à l'audiovisuel public:	0,00 €
Referencia de l'avis:	12 75 8247530 92	Total pour l'habitation + contribution à l'audiovisuel public:	4 351,00 €
Número de contrat de prélèvement à l'échéance: <small>si vous avez choisi ce mode de paiement</small>		Somme à payer :	4 351,00 €
Identificación de votre imposition:		Date limite de paiement :	17/12/2012
Département:	75 PARIS		
Commune:	116 16 ^{EME} ARRONDISSEMENT		
Lieu d'imposition:	3144 6 RUE EDOUARD FOURNIER		
Número de rôle:	780		
Établi à la date du:	30/10/2012		
Date de mise en recouvrement:	31/10/2012		

MINISTRE DE L'ÉCONOMIE
ET DES FINANCES

Affiliation obligatoire pour les débiteurs au paiement par TIP sur ce document. Un signal visible sur le document peut être RIB si nécessaire.

JOIGNEZ UN RIB

M. OU MME ZANDIAN JINET

6 RUE EDOUARD FOURNIER
PARIS
75016 PARIS 16

TIP - Titre Intercommunal de Paiement

Références à payer: 12 75 8247530 92 C 780 2912 75033 17/12/2012

Centre d'encaissement des finances publiques
TSA 70001
94974 CRETEIL CEDEX 9

€

127582475305 M OU MME ZANDIAN J

002020000129 39780212758247530920750330904806 435100



DIRECTION GÉNÉRALE DES FINANCES PUBLIQUES
AVIS D'IMPÔT 2013
 TAXE D'HABITATION
 Contribution à l'audiovisuel public



CENTRE DES FINANCES PUBLIQUES
 819, PARIS 10ÈME LETTE
 12 RUE GEORGE SAND
 75196 PARIS CEDEX 10

RYO 011 51 NEUSE CHAMP FIC 14.11.13 C10202

0252006009 0004

N ZANDIAN JATI
 OU MME ZANDIAN
 6 RUE EDOUARD FOURNIER
 PARIS
 75016 PARIS 16

Votre adresse

Numéro fiscal	10 75 063 007 438 N
Numéro de taxe	55 75 8253061 56
Identifiant de votre imposition	
Département	752
Commune	PARIS
Canton	110
N° de secteur d'imposition	16 205 ARRONDISSEMENT
Cat. d'imposition	3144
N° de commune	6 RUE EDOUARD FOURNIER
Numéro de commune	757 04 82 069 147 780 3
Numéro de rôle	780
Date d'émission	31/10/2013
Date de mise à disposition	31/10/2013

Votre situation

MONTANT À PAYER	
Au plus tard le 16/12/2013	4 427,00 €
Détail du montant à payer	
Montant de votre taxe d'habitation	4 427,00 €
Montant de votre contribution à l'audiovisuel public	0,00 €

Montant à payer net de la déduction de l'abattement de 10% sur les impôts locaux. Ne jetez aucun déchet domestique dans votre poubelle.

IMPÔT UN RÉS

Centre d'encaissement des finances publiques

94974 CRETEIL CEDEX 9

N ZANDIAN JATI
 OU MME ZANDIAN
 6 RUE EDOUARD FOURNIER
 PARIS
 75016 PARIS 16

TIP Titre Interbancaire de Paiement

Références
 À appeler 13 75 8253061 56 C 780 2013 75033 16/12/2013

CENTRE D'ENCAISSEMENT
 DES FINANCES PUBLIQUES
 TSA 70001
 94974 CRETEIL CEDEX 9



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RECEIVED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
NOV 07 2006
ALAN SLATER, Clerk of the Court

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
NOV 08 2006
ALAN SLATER, Clerk of the Court
BY K. PALACIOS

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

REZA ZANDIAN,
Plaintiff,
vs.
ROBERT ADAMS, JACK GEERING, BARRY
EISLER, PAUL JONES, and Does 1 through
100, inclusive;
Defendants. 04CC1107
EMFACO S.A. a Swiss Corporation
Plaintiff
v.
Robert Adams, et al.
Defendants 04CC11008

) Case No.: No.: 04CC11007 c/w 04CC11008
) [UNLIMITED CIVIL]
) HEARING DATE PENDING: None
) HearingType: Trial
) Date: November 6, 2006
) Time: 9:00 a.m.
) Dept.: C19
) [PROPOSED] JUDGMENT
) Assigned for Trial:
) Judge: Randell L. Wilkinson
) Dept.: 19
) Complaint Filed:
) Trial Date: Completed

The Trial in the above entitled action came on regularly for trial in the above consolidated actions on November 6, 2006 at 9:00 a.m. in Dept. 14 (Judge Charles Margines), and was transferred to Judge Randell L. Wilkinson, Department 19, of the above entitled Court, sitting without a jury. Carl Pentis, Esq. represented Plaintiffs Emfaco S.A., a Swiss Corp., Reza Zandian a.k.a. Gholam-Reza Zandian-Jazi. Reza Zandian provided testimony. No appearance was made by defendant Robert Adams. The court received evidence and finds pursuant to C.C.P. 594 that notice of trial for November 6, 2006 was timely served on non

JCOO

1 appearing Defendant Robert Adams. The court granted Emfacó S.A.'s motion to amend and
2 substitute parties, namely from Emfacó S.A., as Plaintiff, to Emfacó, S.A., a derivative Plaintiff
3 on behalf of Optima Technology Corporation, a California Corporation ("Optmia"), a nominal
4 defendant.

5 Evidence, both oral and documentary, having been presented, the cause having been
6 argued and submitted for decision,

7 IT IS ORDERED, ADJUDGED, AND DECREED THAT:

8

9 **04CC11008 Emfacó v. Adams**

10 1. Plaintiff Emfacó S.A., a derivative plaintiff on behalf of Optima Technology
11 Corporation, a California Corporation, shall recover from Defendant Robert Adams \$1,200,000
12 in damages for the transfer of assets to LaCie S.A., the 325,000 shares of LaCie S.A. (France)
13 shall be transferred from any beneficial ownership by Robert Adams, Optima Technology
14 Corporation, a Delaware Corporation, or any entities under their direction and control to Optima
15 Technology Corporation, A California Corporation.

16 2. Plaintiff Emfacó S.A., a derivative plaintiff on behalf of Optima Technology
17 Corporation, a California Corporation, shall recover from Defendant Robert Adams \$225,000 in
18 damages for the transfer of assets to Soft 77, LLC and receipt of payment from Soft 77, LLC .
19 All payments received by Adams or his related entity Optima Technology Corporation, A
20 Delaware Corporation, on payment of any license fees from Soft 77, LLC, shall be paid over to
21 Optima Technology Corporation, a California Corporation.

22 3. Plaintiff Emfacó S.A., a derivative plaintiff on behalf of Optima Technology
23 Corporation, a California Corporation, shall recover from Defendant Robert Adams \$1,676,000
24 in damages for Adams conversion of receivables from Optima Technology Corporation, a
25 California Corporation.

26 4. Plaintiff Emfacó S.A., a derivative plaintiff on behalf of Optima Technology
27 Corporation, a California Corporation, shall recover from Defendant Robert Adams
28 \$10,000,000.00 in damages for the conversion of the software of ,Optima Technology

1 Corporation, a California Corporation.

2 5. The monetary damages awarded to Plaintiff Emfaco S.A., a derivative plaintiff on
3 behalf of Optima Technology Corporation, a California Corporation, from Defendant Robert
4 Adams itemized in paragraphs 1-4 above total \$13,101,000.00 upon which interest shall accrue at
5 the legal rate (10%), from the date of entry of this judgment, until paid. The damages in 1-4
6 arise solely from the fraud/embezzlement of Robert Adams while acting in his C.E.O. fiduciary
7 capacity of Plaintiff Emfaco S.A., derivative Plaintiff for Optima, by converting corporate assets.

8 6. A permanent injunction against Defendant Robert Adams:

9 A. Prohibiting Defendant from directly or indirectly infringing upon Optima Technology
10 Corporation, a California Corporation (hereinafter " Optima") Optima's copyrights in its
11 products Xchange PRO, Xchange Pro, DeskTape Pro, CD-R Access Pro, SCSI Inspector, and
12 DiskArray Pro, U.S. Patent 5,666,531 (hereinafter collectively referred to as "Products"), or
13 continuing to market, offer, sell, dispose of, license, transfer, display, advertise, reproduce,
14 develop, or manufacture any works derived or copied from Optima, or to participate in or assist
15 such activity.

16 B. Prohibiting Defendant Robert Adams from marketing, distributing, licensing, or selling
17 unauthorized goods using the marks or any portion of such marks Desk Tape, Desk-Tape Pro,
18 CD-R Access, CD-R Access Pro, Xchange, Xchange Pro, Disk-Array and Disk-Array Pro, the
19 "Optima Technology" name or Optima's distinctive Product packaging.

20 C. Prohibiting Defendant Robert Adams from passing off, or allowing others to pass off,
21 products consumers believe are Optima products and services, which are in fact no produced by,
22 connected with, or sponsored by Optima.

23 D. Prohibiting Defendant Robert Adams from otherwise injuring Optima's business reputation,
24 or diluting Optima's marks.

25 E. Requiring Defendant Robert Adams to turn over to Optima within 10 days of entry of this
26 order, any and all source code, object code, instructions, executable programs, or other data
27 which reflects, discusses or embodies any of the Products including all forms whatsoever
28 including electronic data.

1 F. After providing Zandian's counsel Carl Pentis, Esq. 500 N. State College Blvd. Suite 1200,
2 Orange, CA 92868, fax 714 634-3869, notice and opportunity to recover the electronic data,
3 requiring Defendant Robert Adams to destroy any electronic form of all source code, object code,
4 instructions, executable programs, or other data which reflects, discusses or embodies any of the
5 Products existing on any hard drives, discs which cannot be turned over pursuant to paragraph E
6 above, file servers, any independent 3rd party electronic data banks, to which Robert Adams has
7 access or any other location under the custody, control or access of Robert Adams.

8 G. Requiring all payments received by Robert Adams or his related entity Optima Technology
9 Corporation, A Delaware Corporation, or those under the control of Robert Adams, on payment
10 of any license fees from Soft 77, LLC, to be paid over to Optima Technology Corporation, a
11 California Corporation.

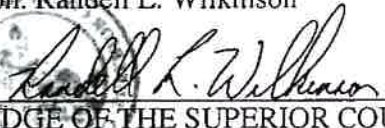
12 H. Requiring Robert Adams or others under his direction and control, to transfer Optima
13 Technology Corporation, A Delaware Corporation the **325,000** shares of LaCie S.A. (France)
14 which were issued in software transaction with LaCie S.A.

15 **04CC11007 Zandian v. Adams**

16 Plaintiff Reza Zandian a.k.a. Gholam-Reza Zandian-Jazi shall recover from Defendant
17 Robert Adams ~~\$100,000~~ ^{\$50,000 RRW} as damages for emotional distress, \$850,000 as damages for loss of the
18 Nevada Land real estate transaction through Robert Adams' defamation of Mr. Zandian. For an
19 order and permanent injunction, all enjoining Adams and his agents, servants, and employees,
20 and all persons acting under, in concert with, or for him:

21
22 Plaintiffs Reza Zandian and Emfaco S.A., a derivative plaintiff on behalf of Optima Technology
23 Corporation, a California Corporation, are prevailing parties, and are entitled to an award of
24 statutory costs of \$ _____ against Defendant Robert Adams.

25 DATED: 11/6/06

Hon. Randell L. Wilkinson

JUDGE OF THE SUPERIOR COURT

28 F:\Clients\3579\Pl\04CC11007 c.w 04CC11008\TrialJudgment.01.wpd



664074

11/28/2012
002 of 9

1 Matthew D. Francis (6978)
 Adam P. McMillen (10678)
 2 WATSON ROUNDS
 5371 Kietzke Lane
 3 Reno, NV 89511
 Telephone: 775-324-4100
 4 Facsimile: 775-333-8171
 Attorneys for Plaintiff Jed Margolin

REC'D & FILED
 2012 NOV -6 AM 11:47
 ALAN GLOVER
 C. Cooper CI FRK
 DEPUTY

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

9
 10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

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

20 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

NOTICE OF ENTRY OF JUDGMENT

21 TO: All parties:

22 **PLEASE TAKE NOTICE** that on October 31, 2012, the Court entered a Default
 23 Judgment in the above-referenced matter, against Defendants Optima Technology
 24 Corporation, a Nevada corporation and Optima Technology Corporation, a California
 25 corporation. Attached as Exhibit 1 is a true and correct copy of such Default Judgment.

26 ///

27 ///

28 ///



664074

11/26/2012
008 of 9

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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: November 5, 2012.

WATSON ROUNDS

By: 

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

Attorneys for Plaintiff Jed Margolin



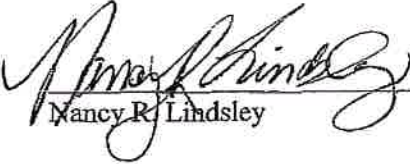
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CERTIFICATE OF SERVICE

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

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32

664074

11/26/2012
006 of 9

Exhibit 1

Exhibit 1



664074

11/28/2012
006 of 8

1 Matthew D. Francis (6978)
 2 Adam P. McMillen (10678)
 3 WATSON ROUNDS
 4 5371 Kietzke Lane
 5 Reno, NV 89511
 6 Telephone: 775-324-4100
 7 Facsimile: 775-333-8171
 8 *Attorneys for Plaintiff Jed Margolin*

REC'D & FILED

2012 OCT 31 PM 1:42

ALAN GLOVER

BY *J. Glover* CLERK
DEPUTY

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 aka**
 18 **GOLAMREZA ZANDIANJAZI aka**
 19 **GHOLAM REZA ZANDIAN aka REZA JAZI**
 20 **aka J. REZA JAZI aka G. REZA JAZI aka**
 21 **GHONONREZA ZANDIAN JAZI, an**
 22 **individual, DOE Companies**
 23 **1-10, DOE Corporations 11-20, and DOE**
 24 **Individuals 21-30,**

25 **Defendants.**

26 **Case No.: 090C00579 1B**

27 **Dept. No.: 1**

28 **DEFAULT JUDGMENT**

29 WHEREAS Plaintiff filed the Amended Complaint in this action on August 11, 2011.
 30 After extensive briefing regarding service on Defendants Optima Technology Corporation, a
 31 Nevada corporation, and Optima Technology Corporation, a California corporation (together
 32 the "Defendants"), and after the Court denied Defendants' Motion to Dismiss, Defendants
 33 served and filed a General Denial in response to the Amended Complaint. The General Denial
 34 was served on March 13, 2012 on behalf of the Defendants.

35 WHEREAS on March 13, 2012, Defense counsel moved to withdraw from
 36 representing all of the individual and corporate Defendants in this action. On March 16, 2012,



664074

11/26/2012
007 of 9

1 Plaintiff filed a non-opposition to Defense counsel's Motion to Withdraw, and on April 26,
2 2012, this Court granted Defense counsel's Motion to Withdraw.

3 WHEREAS on May 15, 2012, Plaintiff moved this Court for an order compelling the
4 appearance of counsel for the Defendants or in the alternative an order striking the General
5 Denial of the Defendants. The Defendants did not respond to the motion. On June 28, 2012,
6 this Court ordered that the Defendants retain counsel and that counsel enter an appearance in
7 this matter on behalf of the Defendants by July 15, 2012. This Court also ordered that if no
8 appearance was made by that date the General Denial would be stricken.

9 WHEREAS since no appearance was made on behalf of the Defendants, Plaintiff filed
10 an application for entry of default on September 14, 2012. On September 24, 2012, this Court
11 entered a default against the Defendants. The notice of entry of default was served on
12 September 26, 2012, and filed on September 27, 2012. Now Plaintiff seeks entry of a default
13 judgment against Defendants.

14 WHEREAS Defendants are not infants or incompetent persons and are not in the
15 military service of the United States as defined by 50 U.S.C. Appx § 521.

16 WHEREAS the allegations in Plaintiff's Amended Complaint warrant entry of final
17 judgment against Defendants Optima Technology Corporation, a Nevada corporation, and
18 Optima Technology Corporation, a California corporation, for conversion, tortious
19 interference with contract, intentional interference with prospective economic advantage,
20 unjust enrichment, and unfair and deceptive trade practices.

21 WHEREAS Defendants Optima Technology Corporation, a Nevada corporation, and
22 Optima Technology Corporation, a California corporation, are jointly and severally liable to
23 Plaintiff for the principal amount of \$1,286,552.46.

24 THEREFORE, Judgment is hereby entered for Plaintiff and against Defendants Optima
25 Technology Corporation, a Nevada corporation, and Optima Technology Corporation, a
26 California corporation, for damages, along with pre-judgment interest, attorney's fees and
27 costs in the amount of \$1,286,552.46, plus interest at the legal rate, pursuant to NRS 17.130,
28 thereon from the date of default until the judgment is satisfied.



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11/26/2012
008 of 9

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JUDGMENT is hereby entered against Defendants Optima Technology Corporation, a Nevada corporation, and Optima Technology Corporation, a California corporation, in favor of Plaintiff this 31ST day of October, 2012.

James T. Russell
DISTRICT COURT JUDGE



664074

11/26/2012
009 of 9

CERTIFIED COPY

The document to which this certificate is attached is a full, true and correct copy of the original on file and of record in my office.

Date November 14, 2012

Alan Glover, City Clerk and Clerk of the First Judicial District
Court of the State of Nevada, in and for Carson City.

By C. Phillips Deputy

Per NRS 239 Sec. 6 the SSN may be redacted, but in no way affects the legality of the document.

DOC #

677329

08/19/2013

11 53 AM

Official Record

Requested By
WATSON ROUNDS

Euro County - NV

D Mike Smates - Recorder

Page 1 of 5 Fee \$18.00

Recorded By: ST RPTT

APN# _____

Recording Requested by and Return To:



Name WATSON ROUNDS

Address 5371 Kietzke Lane

City/State/Zip Reno, NV 89511

DEFAULT JUDGMENT

(Title of Document)

This cover page must be type or printed.



677329

08/19/2013
002 of 5

1 Matthew D. Francis (6978)
 2 Adam P. McMillen (10678)
 WATSON ROUNDS
 3 5371 Kietzke Lane
 Reno, NV 89511
 Telephone: 775-324-4100
 Facsimile: 775-333-8171
 4 Attorneys for Plaintiff Jed Margolin

REC'D & FILED
 2013 JUN 24 PM 4: 12
 ALAN SLOVER
 C. ERVEN
 BY _____ CLERK
 DEPUTY

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

9 JED MARGOLIN, an individual,
 10
 11 Plaintiff,

12 vs.

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

19 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

DEFAULT JUDGMENT

20
 21 WHEREAS Plaintiff JED MARGOLIN filed an Amended Complaint in this action on
 22 August 11, 2011. On March 5, 2012, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
 23 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
 24 GHONONREZA ZANDIAN JAZI ("Zandian") served a General Denial to the Amended
 25 Complaint. On March 13, 2012, OPTIMA TECHNOLOGY CORPORATION, a California
 26 corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, served a
 27 General Denial to the Amended Complaint.
 28



1 WHEREAS on June 28, 2012, this Court issued an order requiring the corporate
 2 Defendants to retain counsel and that counsel must enter an appearance on behalf of the
 3 corporate Defendants by July 15, 2012. If no such appearance was entered, the June 28, 2012
 4 order said that the corporate Defendants' General Denial shall be stricken. Since no
 5 appearance was made on their behalf, a default was entered against them on September 24,
 6 2012. A notice of entry of default judgment was filed on November 6, 2012.

7 WHEREAS on January 15, 2013, this Court issued an order striking the General Denial
 8 of Zandian and awarding his fees and costs incurred in bringing the motion to strike. A default
 9 was entered against Zandian on March 28, 2013. A notice of entry of default judgment was
 10 filed on April 5, 2013.

11 WHEREAS Defendants are not infants or incompetent persons and are not in the
 12 military service of the United States as defined by 50 U.S.C. § 521.

13 WHEREAS the allegations in Plaintiff's Amended Complaint warrant entry of final
 14 judgment against all named Defendants for conversion, tortious interference with contract,
 15 intentional interference with prospective economic advantage, unjust enrichment, and unfair
 16 and deceptive trade practices.

17 WHEREAS all Defendants are jointly and severally liable to Plaintiff for the principal
 18 amount of \$1,495,775.74.

19 THEREFORE, Judgment is hereby entered for Plaintiff and against Defendant Zandian
 20 and Defendants Optima Technology Corporation, a Nevada corporation, and Optima
 21 Technology Corporation, a California corporation, for damages, along with pre-judgment
 22 interest, attorney's fees and costs in the amount of \$1,495,775.74, plus interest at the legal rate,
 23 pursuant to NRS 17.130, thereon from the date of default until the judgment is satisfied.

24 |||
 25 |||
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677329

08/19/2013
005 of 6

CERTIFIED COPY

The document to which this certificate is attached is a full, true and correct copy of the original on file and of record in my office.

Date July 26, 2013

Alan Glover, City Clerk and Clerk of the First Judicial District Court of the State of Nevada, In and for Carson City.

By [Signature] Deputy

Per NRS 239 Sec.6 the SSN may be redacted, but in no way affects the legality of the document.



677329

08/19/2013
004 of 5

1 JUDGMENT is hereby entered against Defendant Zandian and Defendants Optima
2 Technology Corporation, a Nevada corporation, and Optima Technology Corporation, a
3 California corporation, in favor of Plaintiff this 24th day of June, 2013.

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James T. Brundall
DISTRICT COURT JUDGE

----- Forwarded message -----

From: **reza zand** <rezazand@hotmail.com>

Date: Wed, Oct 9, 2013 at 2:12 PM

Subject: Re: Mailbox

To: Alborz <alborzzandian@gmail.com>

It is very unfortunate and irresponsible for this to happen, I was relying on you to take care of it.

On Oct 10, 2013, at 0:36, "Alborz" <alborzzandian@gmail.com> wrote:

Baba I'm in SD. Mailbox has been closed since April 22nd. I renewed it on November 2012 for 6 months. It expired on April. I thought you took care of this with Kathy when you visited her recently.

Anyway, fortunately no one else rented out the mailbox so I can still get it and buy it for another year. But all mail that was sent from April 22 til now has been returned to sender.

I am filling out application process and paying to renew the mailbox. I will so pay Kathy to forward mail. But it's very important that you contact anyone that you think has sent you important documents in last 5 months and ask them to mail it again.

Even if they sent it in last 2 weeks relating to escrow of Sd land you need to contact them tell them

To mail it again.

Thanks,
Alborz

Sent from my iPhone



Department of the Treasury
Internal Revenue Service
Ogden UT 84201-0039

For assistance, call:
1-800-829-0115

Notice Number: CP161
Date: September 12, 2011

Taxpayer Identification Number:
33-0391754
Tax Form: 941
Tax Period: June 30, 2011

015925.890895.0073.002 1 AT 0.365 870
|||

OPTIMA TECHNOLOGY CORP
PO BOX 927674
SAN DIEGO CA 92192-7674742



15925

Request for Payment Federal Employment Tax

Our records show you owe \$7.61 on your return for the above tax period.

What You Need to Do

Pay the amount you owe now by using one of the following methods. To avoid additional penalty and/or interest, we must receive your payment by October 3, 2011. The Electronic Federal Tax Payment System (EFTPS) is the preferred method to ensure your tax payments are on time and secure.

- **EFTPS**
 - If you are currently enrolled, go to www.eftps.gov or call 1-800-555-4477.
 - To learn more about EFTPS and other electronic payment options, including credit card payments, visit www.irs.gov keyword: e-pay.
- **Check or Money Order**
 - Make your check or money order payable to the **United States Treasury**;
 - Write your taxpayer identification number, tax form number, tax period, and your phone number on your payment; and
 - Mail your payment with the payment voucher located at the bottom of this notice in the enclosed envelope.

If you choose to pay by check or money order, please allow enough mailing time so that we receive your payment by October 3, 2011.

If you believe this notice is incorrect, please call us at 1-800-829-0115. When you call, please have your payment information and a copy of your return available. This information will help us find any payment you made that we haven't applied.

Tax Statement

Tax on Return	\$148.96
Total Credits	\$148.96-
Amount Previously Refunded to You	\$.00

G. REZA ZANDIAN JAZI
P.O. BOX 927674
SAN DIEGO, CA 92192-7674

1981

94-7074/3212 282
2608952484

12/11/2010 Date

25

\$ 1226

Pay to the Order of Franchise Tax Board

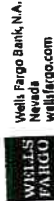
Security Printing & Mfg.



Dollars

One thousand two hundred twenty six

and 25/100



For Optima taxes

⑆321270742⑆ 2508952484⑈ 0198⑈

[Handwritten signature]

MP

G. REZA ZANDIAN JAZI
P.O. BOX 927674
SAN DIEGO, CA 92192-7674

1950

94-7074/3212 2B2
2508952484

9/14/2010 Date

Pay to the Order of Franchise Tax Board \$ 835⁰⁰
Eight Hundred Thirty Five ⁰⁰/₁₀₀ Dollars

© 1999 WELLS FARGO BANK, N.A.



Wells Fargo Bank, N.A.
Nevada
wellsfargo.com

For 1565687
Optima Technology Corp

⑆ 321270742⑆ 2508952484⑆ 01950



Secretary of State
Business Programs Division

1500 11th Street
P.O. Box 944230
Sacramento, CA 94244-2300

Statement of Information
(916) 657-5448

REZA ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

February 02, 2011

RE: C1565687
OPTIMA TECHNOLOGY CORPORATION

In response to your request, the penalty assessed against the above-referenced entity for failure to file the required Statement of Information cannot be waived based on the information provided.

The reason(s) stated in your request do not justify failure to file the required statement.

The penalty is due and payable to the California Franchise Tax Board according to the instructions set forth in the California Franchise Tax Board's Notice of Balance Due. Questions regarding payment should be directed to the California Franchise Tax Board, P.O. Box 942857, Sacramento, CA 94257-0540 or by calling (800) 852-5711.

For more information, go to www.leginfo.ca.gov/calaw.html and see California Corporations Code sections 1502, 2117, 2204, 2206, 6210, 6810, 8210, 8810, 9660, 9690, 12570, 12670, 17060, 17651, 17653, 17655; California Civil Code section 1363.6; California Financial Code section 14101.6; California Food and Agricultural Code section 54040; and California Revenue and Taxation Code section 19141.

Business Programs Division
Statement of Information Unit

1 **NOE**

2 Ryan E. Johnson
3 Nevada Bar No. 9070
4 **WATSON ROUNDS**
5 10000 West Charleston Blvd., Ste. 240
6 Las Vegas Nevada 89135
7 Tel. No. 702-636-4902
8 Fax No. 702-636-4904
9 Attorney for Defendants,
10 Johnson Spring Water Company, LLC,
11 Fred Sadri, Trustee of Star Living
12 Trust and Ray Koroghli

RECEIVED
FEB 15 2013
JOHN PETER LEE

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 **GHOLAMREZA ZANDIAN JAZI**, also
11 known as **REZA ZANDIAN**, individually,

11 Plaintiff,

12 vs.

13 **FIRST AMERICAN TITLE COMPANY**, a
14 Nevada business entity; **JOHNSON SPRING**
15 **WATER COMPANY, LLC**, formerly known
16 as **BIG SPRING RANCH, LLC**, a Nevada
17 Limited Liability Company; **FRED SADRI**,
18 Trustee of the Star Living Trust; **RAY**
19 **KOROGHLI** and **ELIAS ABRISHAMI**,
20 individually,

21 Defendants.

22 **AND RELATED COUNTERCLAIMS**
23 **AND THIRD-PARTY CLAIMS**

CASE NO.: A-11-635430-C
DEPT. NO.: IV

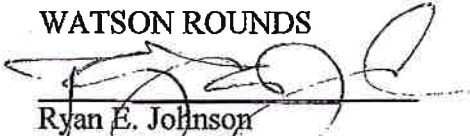
NOTICE OF ENTRY OF ORDER

24 **TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD**

25 **YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE**, that on the 11th day of
26 February, 2013, an Order to Distribute Attorney Fee and Costs Awards to Defendants, was
27 entered in the above-captioned matter. A copy of said Order is attached hereto.

28 Dated: February 15th, 2013

WATSON ROUNDS


Ryan E. Johnson
Nevada Bar No. 9070
WATSON ROUNDS
10000 West Charleston Blvd., Ste. 240
Las Vegas Nevada 89135
Attorney for Defendants

1 **CERTIFICATE OF SERVICE**

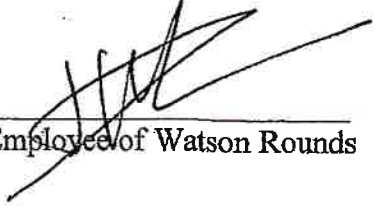
2 Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of the law offices of
3 Watson Rounds, and that on this date, a true and correct copy of the foregoing document,
4 **NOTICE OF ENTRY OF ORDER**, was served upon the following individuals by first class
5 mail through the U.S. Postal Service.

6 John C. Courtney, Esq.
7 Law Offices of John Peter Lee, Ltd.
8 830 Las Vegas Blvd. South
9 Las Vegas Nevada 89101
10 Attorneys for Plaintiff

11 Stanley W. Parry, Esq.
12 100 North City Pkwy., suite 1750
13 Las Vegas Nevada 89106
14 Attorney for Ray Koroghli

15 Elias Abrishami
16 P.O. Box 10476
17 Beverly Hills, California 90213
18 In Pro Per

19 Dated: February 13th, 2013.


An Employee of Watson Rounds

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EXHIBIT A

CLERK OF THE COURT

1 **ORDER**
 Ryan E. Johnson, Esq.
 Nevada Bar No. 9070
 2 **WATSON ROUNDS**
 10000 West Charleston Blvd., Suite 240
 3 Las Vegas, NV 89135
 (775) 324-4100
 4 (775) 333-8171 facsimile
 5 Attorney for Defendants
 Johnson Spring Water Company, LLC,
 6 and Fred Sadri, Trustee of Star Living Trust

7
 8 **DISTRICT COURT**
 9 **CLARK COUNTY, NEVADA**

10 **GHOLAMREZA ZANDIAN JAZI, also known**
 11 **as REZA ZANDIAN, individually,**

12 **Plaintiff,**

13 vs.

14 **FIRST AMERICAN TITLE COMPANY, a**
 Nevada business entity; **JOHNSON SPRING**
WATER COMPANY, LLC, formerly known as
 15 **BIG SPRING RANCH, LLC, a Nevada Limited**
 Liability Company; **FRED SADRI, Trustee of**
 16 **the Star Living Trust; RAY KOROGHLI and**
ELIAS ABRISHAMI, individually,

17 **Defendants.**

18 **AND RELATED COUNTERCLAIMS**
 19 **AND THIRD-PARTY CLAIMS**

CASE NO.: A-11-635430-C
DEPT. NO.: IV

ORDER TO DISTRIBUTE ATTORNEY
FEE AND COSTS AWARDS TO
DEFENDANTS

20 Pursuant to the Order signed July 23, 2012, and filed with the Court on August 9, 2012,
 21 and the Court having considered the affidavits, supplemental affidavits, memorandums of costs,
 22 and oppositions to Plaintiff's Objection filed by the Defendants; the Objection filed by Plaintiff;
 23 having entertained oral argument on the matter on January 24, 2013; pursuant to the prior Order
 24 of this Court making an award of attorneys' fees and costs in those amounts supported by
 25 affidavit; and with good cause appearing:

26 **THE COURT HEREBY FINDS** that all Defendants have submitted supporting
 27 affidavits attesting to the attorneys' fees and costs incurred in this matter.
 28

1 THE COURT FURTHER FINDS that the Objection filed by Plaintiff is sustained only
2 to the extent that the recovery of fees Defendant ELIAS ABRISHAMI (hereinafter referred to
3 as "ABRISHAMI") shall be limited to fees incurred by attorneys retained who are licensed to
4 practice law in the State of Nevada; that the recovery of reasonable attorneys fees by Defendant
5 JOHNSON SPRING WATER COMPANY, LLC, formerly known as BIG SPRING RANCH,
6 LLC (hereinafter referred to as "JSWC"); Defendant FRED SADRI, Trustee of the Star Living
7 Trust (hereinafter referred to as "SADRI"); and Defendant RAY KOROGHLI (hereinafter
8 referred to as "KOROGHLI") shall be limited to the total funds remaining with the Court
9 following the deduction of the legal costs incurred by all parties, the reasonable attorneys' fees
10 awarded herein to ABRISHAMI, and the previously paid reasonable attorneys' fees incurred
11 and paid by JSWC, which is to be distributed to the Defendant Partners (ABRISHAMI,
12 KOROGHLI, and SADRI) as further described herein; AND there shall be no deficiency
13 attorney fee or cost Award owed by Plaintiff to any Defendant following the distribution of the
14 funds held by the Court.
15

16 THE COURT FURTHER FINDS that ONE HUNDRED FIFTY-TWO THOUSAND
17 FIVE HUNDRED TWENTY-EIGHT dollars AND 83 cents (\$152,528.83) is currently held by
18 the Court to secure the instant award of attorneys' fees and costs pursuant to this Court's prior
19 Order and the previous Interpleading of funds with the Court.
20

21 THE COURT FURTHER FINDS that the TOTAL legal cost and fee AWARD made
22 herein for all Defendants relating to all charges incurred in this matter up through the date of
23 this Order shall be ONE HUNDRED FIFTY-TWO THOUSAND FIVE HUNDRED
24 TWENTY-EIGHT dollars AND 83 cents (\$152,528.83) divided between the Defendants as
25 more fully described below.
26

27 THE COURT FURTHER FINDS that following the deduction of reasonable attorneys'
28 fees and costs for ABRISHAMI, JSWC, SADRI, and KOROGHLI; the funds held by the Court

1 shall be fully depleted and there shall be NO additional funds remaining with the Court to be
2 distributed to Plaintiff GHOLAMREZA ZANDIAN JAZI.

3 THE COURT FURTHER FINDS that TWO HUNDRED SIXTY-THREE Dollars and
4 03 Cents (\$263.03) is the amount of reasonable costs actually expended by ABRISHAMI in
5 connection with this matter as noted in the Memorandum of Costs and Disbursements submitted
6 by ABRISHAMI.

7 THE COURT FURTHER FINDS that following the deduction of the ABRISHAMI
8 reasonable cost award, ONE HUNDRED FIFTY-TWO THOUSAND TWO HUNDRED
9 SIXTY-FIVE dollars AND 80 cents (\$152,265.80) remains to be divided among the
10 Defendants as described herein.

11 THE COURT FURTHER FINDS that FIVE HUNDRED THIRTY-TWO Dollars and 91
12 Cents (\$532.91) is the amount of reasonable costs actually expended by KOROGHLI in
13 connection with this matter as noted in the Memorandum of Costs and Disbursements submitted
14 by KOROGHLI.

15 THE COURT FURTHER FINDS that following the deduction of the KOROGHLI
16 reasonable cost award, ONE HUNDRED FIFTY-ONE THOUSAND SEVEN HUNDRED
17 THIRTY-TWO dollars AND 89 cents (\$151,732.89) remains to be divided among the
18 Defendants as described herein.

19 THE COURT FURTHER FINDS that TWO THOUSAND ONE HUNDRED SIXTY-
20 FOUR Dollars and 65 Cents (\$2,164.65) is the amount of reasonable costs actually expended by
21 JSWC and SADRI in connection with this matter as noted in the Memorandum of Costs and
22 Disbursements submitted by JSWC and SADRI.

23 THE COURT FURTHER FINDS that following the deduction of the JSWC and
24 SADRI reasonable cost award, ONE HUNDRED FORTY-NINE THOUSAND FIVE
25

26 ///

1 **HUNDRED SIXTY-EIGHT dollars AND 24 cents (\$149,568.24)** remains to be divided
2 among the Defendants as described herein.

3 **THE COURT FURTHER FINDS** that ABRISHAMI shall be limited to an Award of
4 **\$7,000.00** in reasonable attorneys' fees incurred via his Nevada counsel.

5 **THE COURT FURTHER FINDS** that \$7,000.00 is the reasonable and actual attorneys'
6 fees incurred by ABRISHAMI via his Nevada-licensed counsel in defending this matter. In
7 making this finding the Court has considered: (1) the qualities of ABRISHAMI's counsel, their
8 ability, training, education, professional standing, and skill; (2) the character of the work
9 performed including its difficulty, its intricacy, its importance, time, and skill required, the
10 responsibility imposed and the prominence and character of the parties to this action where they
11 affect the importance of the litigation; (3) the work actually performed by ABRISHAMI's
12 counsel including the skill, time, and attention given to the work; and (4) the result obtained and
13 the benefits derived therefrom and has determined that the fee awarded is reasonable and
14 appropriate under the circumstances and facts of this case.
15

16 **THE COURT FURTHER FINDS** that following the deduction of the ABRISHAMI
17 reasonable attorneys' fee Award, **ONE HUNDRED FORTY-TWO THOUSAND FIVE**
18 **HUNDRED SIXTY-EIGHT dollars AND 24 cents (\$142,568.24)** remains to be divided
19 among the Defendants as described herein.
20

21 **THE COURT FURTHER FINDS** that the Defendant Partners (ABRISHAMI,
22 KOROGHLI, and SADRI) are entitled to reimbursement of the \$14,000.00 previously paid to
23 Watson Rounds by JSWC as follows:

- 24 a. \$4,760.00 (representing 34% of \$14,000.00) to SADRI.
- 25 b. \$4,760.00 (representing 34% of \$14,000.00) to KOROGHLI.
- 26 c. \$4,480.00 (representing 32% of \$14,000.00) to ABRISHAMI.

27
28 **///**

1 THE COURT FURTHER FINDS that \$14,000.00 paid by JSWC for the benefit of the
2 Defendant Partners (ABRISHAMI, KOROGHLI, and SADRI) is a portion of the reasonable
3 and actual attorneys' fees incurred by Defendant Partners (ABRISHAMI, KOROGHLI, and
4 SADRI) in defending this matter. In making this finding the Court has considered: (1) the
5 qualities of Defendant Partners' (ABRISHAMI, KOROGHLI, and SADRI) counsel, their
6 ability, training, education, professional standing, and skill; (2) the character of the work
7 performed including its difficulty, its intricacy, its importance, time, and skill required, the
8 responsibility imposed and the prominence and character of the parties to this action where they
9 affect the importance of the litigation; (3) the work actually performed by Defendant Partners'
10 (ABRISHAMI, KOROGHLI, and SADRI) counsel including the skill, time, and attention given
11 to the work; and (4) the result obtained and the benefits derived therefrom; and has determined
12 that the fee awarded is reasonable and appropriate under the circumstances and facts of this
13 case.
14

15 THE COURT FURTHER FINDS that following the deduction of the above described
16 portion of Defendant Partners' (ABRISHAMI, KOROGHLI, and SADRI) reasonable attorneys'
17 fee Award, **ONE HUNDRED TWENTY-EIGHT THOUSAND FIVE HUNDRED SIXTY-**
18 **EIGHT dollars AND 24 cents (\$128,568.24)** remains to be divided among the Defendants as
19 described herein.
20

21 THE COURT FURTHER FINDS that remaining **ONE HUNDRED TWENTY-EIGHT**
22 **THOUSAND FIVE HUNDRED SIXTY-EIGHT dollars AND 24 cents (\$128,568.24)** held by
23 the Court shall be pro-rated between the reasonable attorneys' fees incurred by KOROGHLI
24 and the reasonable attorneys' fees incurred collectively by JSWC & SADRI such that
25 KOROGHLI shall be entitled to 29.72% of the remaining funds held by the Court and JSWC &
26 SADRI shall be entitled to 70.29% of the remaining funds held by the Court.
27

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1 THE COURT FURTHER FINDS that KOROGHLI shall be limited to a reasonable
2 attorney fee Award of THIRTY-EIGHT THOUSAND ONE HUNDRED NINETY-FIVE
3 dollars AND 74 cents (\$38,195.74).

4 THE COURT FURTHER FINDS that the \$38,195.74 attorney fee Award to
5 KOROGHLI is a portion of the reasonable and actual attorneys' fees incurred by KOROGHLI
6 in defending this matter. In making this finding the Court has considered: (1) the qualities of
7 KOROGHLI's counsel, their ability, training, education, professional standing, and skill; (2) the
8 character of the work performed including its difficulty, its intricacy, its importance, time, and
9 skill required, the responsibility imposed and the prominence and character of the parties to this
10 action where they affect the importance of the litigation; (3) the work actually performed by
11 KOROGHLI's counsel including the skill, time, and attention given to the work; and (4) the
12 result obtained and the benefits derived therefrom; and has determined that the fee awarded is
13 reasonable and appropriate under the circumstances and facts of this case.
14

15 THE COURT FURTHER FINDS that JSWC and SADRI shall be limited to a
16 reasonable attorney fee Award of NINETY THOUSAND THREE HUNDRED SEVENTY-
17 TWO dollars AND 50 cents (\$90,372.50).

18 THE COURT FURTHER FINDS that the \$90,372.50 attorney fee Award to JSWC and
19 SADRI is a portion of the reasonable and actual attorneys' fees incurred by JSWC and SADRI
20 in defending this matter. In making this finding the Court has considered: (1) the qualities of
21 JSWC and SADRI's counsel, their ability, training, education, professional standing, and skill;
22 (2) the character of the work performed including its difficulty, its intricacy, its importance,
23 time, and skill required, the responsibility imposed and the prominence and character of the
24 parties to this action where they affect the importance of the litigation; (3) the work actually
25 performed by JSWC and SADRI's counsel including the skill, time, and attention given to the
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work; and (4) the result obtained and the benefits derived therefrom; and has determined that the fee awarded is reasonable and appropriate under the circumstances and facts of this case.

IT IS THEREFORE HEREBY ORDERED, ADJUDGED, AND DECREED that all Defendants are entitled to legal fees and costs in the amounts allowed by this Court and limited to the funds held by the Court to support the instant Award of attorneys' fees and costs such that no deficiency amount shall remain owing or due by Plaintiff to any Defendant in this matter.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the instant Award of attorneys' fees and costs is supported by the above findings and the findings and prior Order of this Court DISMISSING Plaintiff's Complaint and Providing for the Awarding Attorneys' Fees and Costs to Defendants.

JSWC and SADRI Cost and Fee Award Order

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based on the above findings and pursuant to *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), JSWC and SADRI are entitled to an attorney fee award of NINETY THOUSAND THREE HUNDRED SEVENTY-TWO dollars AND 50 cents (\$90,372.50).

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based upon the above findings, JSWC and SADRI are entitled to cost award of TWO THOUSAND ONE HUNDRED SIXTY-FOUR Dollars and 65 Cents (\$2,164.65).

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based on the above findings and pursuant to *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33 (1969), SADRI is entitled to recover an attorney fee award of FOUR THOUSAND SEVEN HUNDRED SIXTY Dollars and NO Cents (\$4,760.00); representing 34% of \$14,000.00 in reasonable attorneys' fees previously paid by JSWC and awarded herein to JSWC.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the above Ordered cost and attorney fee award to Defendants JSWC and SADRI shall be paid from the ONE

1 HUNDRED FIFTY-TWO THOUSAND FIVE HUNDRED TWENTY-EIGHT Dollars and 83
2 Cents (\$152,528.83) currently held by the Court and shall be disbursed as follows:

- 3 1. NINETY-TWO THOUSAND FIVE HUNDRED THIRTY-SEVEN Dollars and 15
4 Cents (\$92,537.15) shall be made payable by the Court directly to the Law Offices
5 of Watson Rounds; and
6 2. FOUR THOUSAND SEVEN HUNDRED SIXTY Dollars and NO Cents
7 (\$4,760.00) shall be made payable by the Court directly to FRED SADRI.

8
9 **ABRISHAMI Cost and Fee Award Order**

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based on the above
11 findings and pursuant to *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33
12 (1969), ABRISHAMI is entitled to an attorney fee award of SEVEN THOUSAND Dollars
13 AND NO Cents (\$7,000.00).

14 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based upon the
15 above findings, ABRISHAMI is entitled to cost award of TWO HUNDRED SIXTY-THREE
16 Dollars and 03 Cents (\$263.03).

17 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based on the above
18 findings and pursuant to *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33
19 (1969), ABRISHAMI is entitled to recover an attorney fee award of FOUR THOUSAND
20 FOUR HUNDRED EIGHTY Dollars and NO Cents (\$4,480.00); representing 32% of
21 \$14,000.00 in reasonable attorneys' fees previously paid by JSWC and awarded herein to
22 JSWC.
23

24 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the above Ordered
25 cost and attorney fee award to ABRISHAMI shall be paid from the ONE HUNDRED FIFTY-
26 TWO THOUSAND FIVE HUNDRED TWENTY-EIGHT Dollars and 83 Cents (\$152,528.83)
27 currently held by the Court and shall be disbursed as follows:
28

1 1. ELEVEN THOUSAND SEVEN HUNDRED FORTY-THREE Dollars and 03 Cents
2 (\$11,743.03) shall be made payable by the Court directly to ELIAS ABRISHAMI.

3 **KOROGHLI Cost and Fee Award Order**

4 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based on the above
5 findings and pursuant to *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33
6 (1969), KOROGHLI is entitled to an attorney fee award of THIRTY-EIGHT THOUSAND
7 ONE HUNDRED NINETY-FIVE dollars AND 74 cents (\$38,195.74).

8 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based upon the
9 above findings, KOROGHLI is entitled to cost award of FIVE HUNDRED THIRTY-TWO
10 Dollars and 91 Cents (\$532.91).

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that based on the above
12 findings and pursuant to *Brunzell v. Golden Gate Nat. Bank*, 85 Nev. 345, 349, 455 P.2d 31, 33
13 (1969), KOROGHLI is entitled to recover an attorney fee award of FOUR THOUSAND
14 SEVEN HUNDRED SIXTY Dollars and NO Cents (\$4,760.00); representing 34% of
15 \$14,000.00 in reasonable attorneys' fees previously paid by JSWC and awarded herein to
16 JSWC.
17

18 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the above Ordered
19 cost and attorney fee award to KOROGHLI shall be paid from the ONE HUNDRED FIFTY-
20 TWO THOUSAND FIVE HUNDRED TWENTY-EIGHT Dollars and 83 Cents (\$152,528.83)
21 currently held by the Court and shall be disbursed as follows:
22

- 23 1. FORTY-THREE THOUSAND FOUR HUNDRED EIGHTY-EIGHT Dollars and 65
24 Cents (\$43,488.65) shall be made payable by the Court directly to RAY
25 KOROGHLI.
26

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Summary of Disbursements to be Made from Funds Held by the Court

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the ONE HUNDRED FIFTY-TWO THOUSAND FIVE HUNDRED TWENTY-EIGHT Dollars and 83 Cents (\$152,528.83) currently held by the Court for Plaintiff shall be distributed entirely to the Defendants and their counsel as follows:


- a. NINETY-TWO THOUSAND FIVE HUNDRED THIRTY-SEVEN Dollars and 15 Cents (\$92,537.15) shall be immediately distributed to the Law Offices of Watson Rounds.
- b. FORTY-THREE THOUSAND FOUR HUNDRED EIGHTY-EIGHT Dollars and 65 Cents (\$43,488.65) shall be immediately distributed to RAY KOROGHLI.
- c. FOUR THOUSAND SEVEN HUNDRED SIXTY Dollars and No Cents (\$4,760.00) shall be immediately distributed to FRED SADRI.
- d. ELEVEN THOUSAND SEVEN HUNDRED FORTY-THREE Dollars and 03 Cents (\$11,743.03) shall be immediately distributed to ELIAS ABRISHAMI.


IT IS SO ORDERED.

DATED this 8th day of February, 2013.


DISTRICT COURT JUDGE

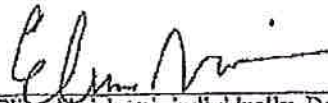
APPROVED AS TO FORM AND CONTENT:


John C. Courtney, Esq.
Law Offices of John Peter Lee, Ltd.
Attorneys for GHOLAMREZA
ZANDIAN JAZI, aka REZA ZANDIAN,
individually, Plaintiff


Stanley Parry, Esq.
Ballard Spahr LLP
Attorney for RAY KOROGHLI, individually,
Defendant

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Elias Abrishami, individually, Defendant
Appearing in proper person

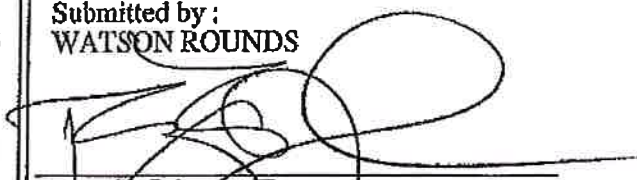
Submitted by:
WATSON ROUNDS

Ryan B. Johnson, Esq.
Nevada Bar No. 9070
10000 West Charleston Blvd., Suite 240
Las Vegas, NV 89135
Attorney for Defendants
**JOHNSON SPRING WATER COMPANY,
LLC, and FRED SADRI, TRUSTEE OF
STAR LIVING TRUST**

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Elias Abrishami, individually, Defendant
Appearing in proper person

Submitted by :
WATSON ROUNDS



Ryan E. Johnson, Esq.
Nevada Bar No. 9070
10000 West Charleston Blvd., Suite 240
Las Vegas, NV 89135
Attorney for Defendants
**JOHNSON SPRING WATER COMPANY,
LLC, and FRED SADRI, TRUSTEE OF
STAR LIVING TRUST**

**Motion to Dismiss Case No. 090C005791B and Vacate
Default Judgments of \$1,495,775.74 and \$1,286,552.46**

To The Honorable Judge James T. Russell,

Your Honor,

My name is Gholam Reza Zandian Jazi (Reza Zandian). I am residing in France and Iran. In the 1990's, I formed a storage software company called Optima Technology Corporation ("OTC") that was based in Irvine, California. Between November 2002 and March 2007, I was in the real-estate development business and bought some vacant lands throughout northern Nevada for my investors. Like many others in the real-estate industry, I was hit hard when the market crashed in 2007-2008.

In August 2011, I moved to Paris, France, and a few months later my wife and two children joined me. My family and I live at 6 Rue Eduoard Fournier, Paris, France, a home I originally purchased in 1989. Since 2011, all of my taxes and utility bills are paid in France. The proper venue and jurisdiction for any case against me is Pontoise, France. Examinations of my passport and French Residency Card, in Exhibit A, reveal that between the dates August 2011 and March 8, 2014, I only traveled to the United States on two occasions, each lasting less than 10 days. In addition being domiciled in France, I frequently visit my ailing, 85-year old mother who resides in Tehran, Iran.

I am writing this letter to inform you that the three default judgments you issued against me and my revoked company, Optima Technology Corporation (OTC), were obtained fraudulently by individuals that have a history of engaging in frivolous lawsuits aimed at extortion. The Plaintiff, Jed Margolin, and his accomplice Robert Adams, have a well-documented history of threatening, blackmailing, and suing large companies, like NASA, Universal Avionics Systems Corporation, Roxio, and Network Solutions, with baseless claims of patent infringement [Exhibit J, "COMPLAINT"]. Likewise in this case, *the Plaintiff, Jed Margolin, is attempting to extort me out of \$1,495,775.74.*

1. FALSE SERVICE IN BAD FAITH.

Attorneys for the Plaintiff, Watson and Rounds, knew that I, Reza Zandian, was living at 6 RUE EDOUARD FOURNIER PARIS, FRANCE, 75116, yet knowingly served me at false addresses in an effort to obtain illegitimate Default Judgments. As evidenced in Exhibit A, "NOTICE OF POSTING COST BOND," since March, 2013, Watson and Rounds was aware of my real address. The attorneys for the Plaintiff, Watson and Rounds, also represented the Respondents in a separate 2013 case I appealed, as the Appellant, to the Supreme Court of the State of Nevada (Supreme Court No. 62839). As evidenced by Exhibit A, "CIVIL PROPER PERSON TRANSCRIPT REQUEST FORM," and "CIVIL PROPER PERSON APPEAL STATEMENT," attorneys for the Plaintiff, Watson and Rounds, were aware of my French address since April 5th, 2013. Due to my absence and an incompetent defense in this Appeal, Watson and Rounds shared in \$90,372.50 of income that taken from me [Exhibit Z]. This emboldened Watson and Rounds with greed and motivated them to pursue additional opportunistic actions against me. For this reason, it is suspected that the attorneys for the Plaintiff are working for contingency. Furthermore, throughout this appeal process, The Supreme Court of Nevada sent several letters directly to my house at 6 RUE EDOUARD FOURNIER, PARIS, FRANCE, 75116, [Exhibit A]. Attorneys for the Plaintiff, Watson and Rounds, knew of my real address through direct legal communications and Supreme Court documents, yet acted in bad faith by serving me at: 8401 BONITA DOWNS ROAD, FAIR OAKS, CA, 95628. I, Reza Zandian, have never been to, lived at, or maintained any association with, this alleged Fair Oaks, California address; the same holds true for my former company, Optima Technology Corporation (OTC). Watson and Rounds, knew of my authentic address in Paris, France, yet chose to serve me through obscure publications in Las Vegas, Nevada and San Diego, California, in an effort to receive a favorable outcome for the Plaintiff, despite knowing that the proper jurisdiction and venue is in France.

I find it very troubling that the Plaintiff's attorney, Watson and Rounds, not only knowingly served me at an incorrect address, but that they also illegitimately requested a Debtor's Examination against me, with the sole intent of hoping to hold me in contempt

of court. From my understanding, A Debtor's Examination can only be applied to an individual that resides within the local jurisdiction of the Carson City Court. The attorneys for the Plaintiff, Jed Margolin, knew that I was not a resident of Nevada, and thereby was ineligible for consideration of a Debtor's Examination. Furthermore, Watson and Rounds was also fully cognizant of the fact that I was residing in either France or Iran, and would not be able to make an appearance in a timely manner, yet still attempted to pursue this matter with a detrimental intention. I find it highly conspicuous that the attorneys for the Plaintiff have, on several occasions, acted in bad faith with respect to cases against me.

2. INABILITY TO RECEIVE CRITICAL DOCUMENTS.

Your Honor, as I mentioned in my Affidavit, I did not receive critical documents relating to this case, which included: pleadings, orders, discovery, default, or judgment notices relating to this case. I also never received any Notice of Withdrawal from my attorney John Peter Lee. Prior to moving to France, I lived at 8775 COSTA VERDE BLVD, San Diego, California, an apartment complex with hundreds of apartment units. At this complex, I had lived in apartments 1416, 416, 501, and lastly 217. In 2010, I obtained a post office mailbox: PO BOX 927674, in San Diego, California as preparation for my imminent move to Paris, France. All mail from my last apartment (Apt. 217) at 8775 Costa Verde Blvd, was forwarded to my P.O. Mailbox. I notified the US Postal Services of San Diego, The Nevada Secretary of State, Lyon County, Churchill County, Elko County, Washoe County, and Wells Fargo to forward all of my mail from 8775 Costa Verde Blvd, Apt. 217 to PO BOX 927674. My use of this post office mailbox is chronologically documented through checks I issued through Wells Fargo on September 14, 2010 [Exhibit B] and December 1, 2010 [Exhibit B], as well letters from both the California Secretary of State dated on February 2, 2011 [Exhibit B] and the IRS dated September 12, 2011 [Exhibit B]. My oldest, and only son residing in the United States, would intermittently travel to San Diego and collect any mail I had received at this mailbox. On one of my son's trips to San Diego in October 10, 2013, he informed me via email that the mailbox had expired and been closed since April 22nd, 2013 [Exhibit B]. My son renewed the mailbox on this visit in October. But this unfortunately meant I was

unable to receive any mail at this mailbox for the six-month period of April 22, 2013 to October 10, 2013.

3. TRUE IDENTITY AND MOTIVE OF PLAINTIFF, JED MARGOLIN.

I have never seen or met the Plaintiff, Jed Margolin. The only connection I have to this man is through Robert Adams, a former, rogue employee of mine that worked for OTC in 1990-1995 and 2001-2005. Shortly after Robert Adams returned to OTC, in 2002, he tried to overtake control of my company and damage my reputation through a series of libelous, slanderous, and malicious press releases he published during 2004 and 2005. Robert Adams also attempted to embezzle me through forgery of my signature. In the 2006 case of EMFACO S.A. and Reza Zandian vs. Robert Adams (Case No.: 06CC08517), represented by Carl J. Pentis Esq. of Wildish and Nialis, I sued Robert Adams for defamation and damages and received a \$13,101,000 judgment against Robert Adams, a true original certified copy of which is hereby attached [Exhibit C]. The judgment included interest payments and explicitly prohibited Robert Adams from ever, directly or indirectly, using Optima's name, products, or software [Exhibit C page 4, Judgment 04CC11008, Page 2-3]. More importantly, the judgment called for,

“[A] Permanent injunction against Robert Adams and his agents, servants, employees, and all persons acting under, in concert with, or for him.” [Exhibit C page 4, Judgment 04CC11008, Page 3, Lines 18-19]

Simply put Your Honor, Robert Adams is using the Plaintiff, Jed Margolin, as a façade to evade the \$13,101,000 judgment against him. The Plaintiff, Jed Margolin, is an agent of Robert Adams, the ex-rouge employee, fugitive, and conman, against whom we have secured a \$13,101,000 judgment. The Plaintiff, Jed Margolin, is trying to fraudulently obtain default judgments against me to avenge his friend and partner Robert Adams. **The following is strong empirical evidence that the Plaintiff, Jed Margolin, and Robert Adams are co-conspirators with indisputable ties one another:**

I. Plaintiff, Jed Margolin, uses two variations of the same address on all of his documents and on the letterheads of Optima Technology (My company):

- a) 1981 Empire Road, Reno, Nevada, 89521-7430
- b) 1981 Empire Road, VC Highlands, Nevada, 89521-7430

The following are references in which Jed Margolin uses this Reno address:

- i) August 5, 2008 letter from Jed Margolin to NASA Headquarters. [Exhibit I]
- ii) November 5, 2009 letter from Jed Margolin to NASA Headquarters. [Exhibit I]

II. Robert Adams also uses the same exact address as Jed Margolin on all of his documents and on the letterheads of Optima Technology (My company):

- a) 1981 Empire Road, Reno, Nevada, 89521-7430
- b) 1981 Empire Road, VC Highlands, Nevada, 89521-7430

The following are references in which Robert Adams uses this Reno address:

- i) August 1, 2008 Letter by Robert Adams to NASA Headquarters. [Exhibit I]
- ii) Certified Mail sent from NASA to Robert Adams. [Exhibit H]
- iii) August 1, 2007 Letter from Robert Adams to Ionatron, Inc. [Exhibit H]

“1981 Empire Road, Reno, NV, 89521” is the only address that Udall Law Firm (previously unpaid attorneys for Margolin and Adams), NASA, and Reza Zandian have been able to identify for the Robert Adams. It is believed that Robert Adams is seeking asylum with help of his alias Jed Margolin in Reno, Nevada. That is why the two men share one home as the headquarters of a company that uses the “Optima” name, contrary to the injunction order.

III. Complaints by Universal Avionics Systems against Jed Margolin revealed that Jed Margolin appointed Robert Adams as his ‘agent’ and granted him Durable Power of Attorney (“DPA”) to act as his Attorney-in-fact on behalf of my company. [Exhibit E]

IV. On or about 2008, Robert Adams and Plaintiff, Jed Margolin, together formed Optima Technology Group (“OTG”), a fictitious business entity in the Cayman Islands. This took place after Robert Adams had already received a \$13,101,000 judgment against him in 2006 and was precluded from any association with “Optima” per court ruling, [Exhibit C page 4, Judgment 04CC11008, Page 2-3]. Inter-State Investigative Services found that “the Cayman Islands address of Optima Technology Group Inc., (“OTG”) does not belong to OPTIMA TECHNOLOGY and that there is no telephone number

associated with the address,” [Exhibit L, PLAINTIFF’S MOTION TO EXTEND TIME TO SECURE SERVICE OF PROCESS UPON DEFENDANT ROBERT ADAMS”].

V. Robert Adams describes Jed Margolin as an employee, and as his “Chief Scientist” of Optima Technology Group.

VI. Documents and emails from the October, 2004 case of Optima Technology Corp (OTC) vs. Roxio Inc. indicate that Jed Margolin was a consultant and/or employee of Robert Adams, and hence indirectly a former employee of OTC. [Exhibit M]

VII. On November 7th, 2008, Udall Law Firm, L.L.P filed a case against Jed Margolin and Robert Adams for unpaid legal fees of \$46,446.10. Edward Moomjian, representing Plaintiff Udall, expressed great frustration with the inability to locate the whereabouts of Robert Adams [Exhibit L, “PLAINTIFF MOTION TO EXTEND TIME TO SECURE SERVICE OF PROCESS ON ROBERT ADAMS”]:

“Plaintiff has made diligent attempts to secure service of process upon Defendant Robert Adams, but those attempts have been unsuccessful because Robert Adams is avoiding service, intentionally refuses to provide his location information necessary to serve process upon him, and intentionally refuses to sign a waiver of service which was electronically delivered to him.”

“Jed Margolin provided to the Plaintiff a Cayman Islands address where the headquarters of Optima Technology is allegedly located and another potential address for Defendant Robert Adams: 474 White Cap Lane, Newport Coast, CA, 92657.”

All of these addresses turned out to be erroneous. Jed Margolin deliberately provided incorrect information to conceal the true location and whereabouts of Robert Adams. In Exhibit L, “AFFIDAVIT OF PROPRIETY OF SERVICE OF PUBLICATION,” Edward Moomjian II, of Udall Law firm, explains that despite having a team of private investigators, and a list of over 10 suspected addresses, homes, and PO boxes, his firm was unable to locate Robert Adams, who was deliberately avoiding service to avoid paying \$46,446.10.

VII. Robert Adams issued false, libelous, slanderous and press releases and emails claiming that the “Special Agents with U.S Homeland security have offered a reward for Mr. Zandian,” [Exhibit Q]. Robert Adams signs these press releases as a “loyal concerned citizen,” [Exhibit, Q]. The language of Robert Adams’ fabricated press 2004-2005 releases and emails bare a striking resemblance to Jed Margolin’s Voluntary Statement issued on February 6, 2008 [Exhibit R]. Margolin regurgitates the same false information claiming his “attorneys have been in contact with the FBI,” [Exhibit]. Like Robert Adams, Jed Margolin also signs these a “concerned that Mr. Zandian may be up to some mischief in our County,” [Exhibit R]. It does not take much ingenuity to draw parallels between the writing styles, structure, and content shared between Adams and Margolin. It is clear that Robert Adams and Jed Margolin work together, with an interest aligned in destroying Reza Zandian’s reputation.

IX. Jed Margolin also uses Robert Adams’ and OTC’s former Irvine, California address of 2222 Michelson Drive, Suite 1830, interchangeably with his own. [Exhibit H]

4. PATENTS-IN-SUIT BY PLAINTIFF ARE FRAUDULENT AND INVALID.

These patents-in-suit are illegitimate, invalid, and fraudulently back-dated by Jed Margolin, who is described by Universal Avionics Systems as a “patent troll,” [Exhibit J, [COMPLAINT]], and Robert Adams, whose girlfriend was working at the US Patent and Trademark Office (UTSPO). Documents signed by Jed Margolin and Robert Adams clearly show that the patents in question were assigned to Optima Technology Inc., of Irvine, California on July 20, 2004, [Exhibit E]. Then at some point between September 21, 2007 and October 5, 2007, Margolin created a Patent Assignment which he “knowingly and fraudulently back-dated to July 20, 2004,” whereby he attempted to assign the entire right, title and interest in the ‘073 and ‘724 patents to Optima Technology Group Inc., a Delaware Corporation, [Exhibit E, Exhibit J]. Then later on a motion filed by Jed Margolin in December 11, 2009, he declares that in July 2004, he granted these patents-in-suit to Optima Technology Group (“OTG”), a Cayman Islands Corporation, [Exhibit F].

Optima Technology Corporation (OTC) was an Irvine, California based company founded by Reza Zandian in January 1990, which specialized in creating software storage

for Apple Computers. Reza Zandian, the founder, owner, sole director, and sole voting shareholder of Optima Technology Corporation (OTC), retained his ownership in OTC until June 1997 then transferred the ownership to EMFACO, S.A. a Swiss Corporation.

In January of 1993, Reza Zandian was at the center of a highly publicized case in which the Federal Government accused him and his associate Charles Reger of illegally exporting high-powered IBM computers to Iran. On July 7, 1993 however, U.S. District Judge Edward Rafeedie threw out the case and dismissed all charges against Reza Zandian and Charles Reger.

Excerpt From Exhibit P, a Los Angeles times article:

"In granting the defense motion, Rafeedie called the remaining counts a "desperate attempt" by the government to salvage its case. Reger said the judge "basically said this is crap. That's what it boils down to." Los Angeles attorney Alan Rubin, who represented Reger, said Rafeedie's decision "took a lot of courage."

In 2002, Robert Adams was nominated as the CEO of Optima Technology Corporation (OTC) of California to help revitalize the company. It was realized shortly after that Robert Adams was indeed a conman. Contrary to his fiduciary duties however, Adams tried to overtake control and ownership of the company. In 2004 and 2005, Adams issued a series of misleading, libelous, and slanderous press releases suggesting that the FBI was looking for Reza Zandian who was a 'terrorist'; Adams also made reference to the dismissed 1993 Export Case against Zandian, in a desperate effort to misconstrue reality and falsely damage Zandian's reputation and credibility.

In wake of Robert Adams behavior, Reza Zandian incorporated Optima Technology Corporation (OTC) in Nevada in 2004, and was determined to take legal action against his deviant employee. During the legal proceedings that followed, it was revealed that in 2004, without Mr. Zandian's consent or authorization, Robert Adams had licensed OTC's software to a company by the name of Soft 77 L.L.C for \$225,000. In the 2006 case of EMFACO S.A. and Reza Zandian vs. Robert Adams (Case No.: 06CC08517), represented by Carl J. Pentis Esq. of Wildish and Nialis, Reza Zandian received a

\$13,101,000 judgment against Robert Adams [Exhibit C]. The judgment included interest payments and explicitly prohibited Robert Adams from ever directly or indirectly using Optima's name, products, or software. It is important to note that a few weeks before the judgment was issued against Robert Adams, Robert Adams emailed Reza Zandian's attorney, Carl Pentis, with a settlement offer. In this offer, he agreed to return all assets, licenses from "Optima Technology Corporation ("Optima"), a Delaware corporation, having a perpetual place of business located at Irvine, California," [Exhibit C]. The settle offer was declined, but by Robert Adams' own admission, Optima Technology Corporation (OTC) of Irvine, California and Optima Technology Inc., of Delaware are in fact the same entity. With a \$13,101,000 judgment against him, Robert Adams fled and was not heard from until 2007.

In 2007 Reza Zandian received a call from Scott. J. Bornstein of Greenberg Traurig LLP, New York, informing him that Robert Adams of Optima Technology was suing Arizona-based Universal Avionics for patent infringement claiming royalties and damages. Reza Zandian informed Mr. Bornstein that he himself was the true director of OTC, and that Robert Adams was a fraud with an outstanding judgment against him for thirteen million dollars [Exhibit X]. Despite the conditions set forth in the judgment against him one year earlier, Robert Adams continued to illegally associate himself with Optima. Original documents provided by Mr. Bornstein revealed that Robert Adams had obtained 4 patents from Jed Margolin and assigned these patents to Optima Technology Inc on July 20th, 2004. On the legal documents concerning the assignment of these patents, Robert Adams uses the Irvine operating address of OTC, which was 2222 Michelson, Suite 1850, Irvine, CA, 92612. Robert Adams signed this agreement as the Attorney-in-fact for Jed Margolin; This Durable Power of Attorney was executed on July 20, 2004 in California.

In an effort to circumvent the judgment against him and continue illegally operating under the "Optima" name, Robert Adams, along with his agent Jed Margolin, created two fraudulent entities: Optima Technology Inc, in Delaware and Optima Technology Group (OTG) in the Cayman Islands in 2008.

Robert Adams and Jed Margolin then began a series of frivolous lawsuits against large, established companies like NASA, Universal Avionics Systems, and Roxio, and threatened and blackmailed Honeywell, Garmin, and Rapid Imaging Software, claiming patent infringement. In his correspondences with these companies, Robert Adams fraudulently calls himself “Dr. Robert Adams” to create the illusion of credibility, despite the fact that he is not a medical doctor, chiropractor, and lacks any doctorate degree (Ph.D). Robert Adams characterizes his agent, Jed Margolin, as an employee and the “Chief Scientist” of Optima Technology Group (OTG). Their intent is simply to blackmail, threaten, and extort large companies and seek illegitimate pecuniary settlements.

Email from Robert Adams and Jed Margolin to Mike Abernethy, of Rapid Imagine Software Inc. (RIS) illustrate how Adams and Margolin engage in threats, blackmail and baseless patents lawsuits. Mr. Abernethy describes OTG as “*patent trolls*” [Exhibit N] in a November 25, 2008 email, and goes on to state in an October 03, 2008 email that:

“Last week I received an email from Optima Technology Group threatening to destroy our relationships with customers and sue us if we don’t license their technologies.”
- Mike Abernethy, [Exhibit N]

“In 1999 the patent office issues a patent to a former Atari employee named Margolin for a Synthetic Environment for Remotely Piloted Vehicle. He had evidently applied for it in 1996. Shortly thereafter he begins to complain to NASA that they and RIS infringed upon his patent presumably by flying a system 2 years before he received his patent. Is this a joke?” - Mike Abernethy, [Exhibit N]

“These patents are defective because the invention is both obvious and non-novel as evidenced by numerous printed published works. Ironically, they claim patent on work already published by NASA over a decade earlier.” - Mike Abernethy, [Exhibit N]

“In other words, OTG is attempting to force NASA to pay for a patent infringement on something that NASA in fact invented and published more than a decade prior to the patent filing.”
- Mike Abernethy, [Exhibit N]

NASA's Intellectual Property Counsel, Edward K. Fein characterizes that Margolin and Adams are:

“They are aware of the likelihood that the patent is invalid, based on prior art, much of which has been furnished by Mike Abernethy, but still want an analysis of potential infringement.” [Exhibit N]

Like NASA, Universal Avionics Systems hired a strong defense team and was fully vindicated of all charges. In **Case No. CV-00588-RC**, Universal Avionics Systems Corporation filed a complaint vs. Optima Technology Group, Inc. (OTG), Optima Technology Corporation (OTC), and Jed Margolin. The complaint by Universal Avionics Systems complaint states:

“In simple terms, Defendants OTG, its President and CEO Robert Adams (“Adams”), and Margolin, made repeated and baseless threats to Universal regarding several patents purportedly owned by OTG.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 1]

“Upon information and belief, at some point between September 21, 2007 and October 5, 2007, Margolin created a Patent Assignment which he knowingly and fraudulently back-dated to July 20, 2004, whereby he attempted to assign the entire right, title and interest in the ‘073 and ‘724 patents to OTG.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 8]

“Upon information and belief, on or about July 20, 2004, Margolin executed a Durable Power of Attorney, whereby he appointed “Optima Technology Inc. – Robert Adams, CEO” as his agent with the “Powers to manage, dispose of, sell and convey” various issued patents, including the ‘074 and ‘724 patents. The Durable Power of Attorney was directed to the registered address for OTC.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 3]

“On or about July 16, 2007, Adams began to issue not-so-subtle threats against Universal, suggesting that OTG would grant a license under the Patents-in-Suit to Honeywell – so that Honeywell could sue Universal – should Universal decline OTG’s offer.” – [Exhibit J, “COMPLAINT,” Page 5]

“Universal was represented at the Tucson Meeting by several members of senior management, along with its outside legal counsel. Adams was the sole representative for OTG and gave the impression that he was acting on behalf of both OTG and Margolin.” [Exhibit J, “SECOND AMENDED COMPLAINT”]

“At the Tucson Meeting, Adams also (mis)represented that Optima had been involved in a number of successful patent infringement lawsuits past. By implication, he suggested that if Universal failed to settle on terms acceptable to the Defendants, it would be the next litigation target.” [Exhibit J, “COMPLAINT,” Page 6]

“Adams, OTG’s current president and CEO, was a paid employee of Defendant OTC from 1990-1995 and its unpaid CEO from 2001 to 2005. The Durable Power of Attorney that Margolin executed on July 20, 2004 whereby he appointed “Optima Technology Inc. – Robert Adams, CEO” as his agent, was entered into during Adams’ tenure as OTC’s CEO. Additionally, the Durable Power of Attorney provided the following address for Optima Technology Inc: 2222 Michelson, Suite 1830, Irvine, California, 92612 – the registered address for Defendant OTC.” [Exhibit J, “SECOND AMENDED COMPLAINT,” Page 7]

“Mercury advised that Optima, through Dr. Adams, had been threatening Mercury for many months in an attempt to convince Mercury to enter into a license agreement under the Optima Intellectual Property. Adams was characterized as a ‘snake oil salesman’ and his behavior was characterized as ‘bizarre.’ [Exhibit J, “COMPLAINT,” Page 8]

“There is a dispute as to the ownership of the ‘073 and ‘724 patents, as both Defendant Optima Technology Corporation (“OTC”) and Optima Technology Group, Inc., (“OTG”) have claimed ownership. Both OTG and OTC appear to

base their respective ownership claims, at least in part, upon a Durable Power of Attorney (the “DPA”) that Margolin signed, whereby he appointed “Optima Technology Inc. – Robert Adams, CEO” as his agent with the “powers to manage, dispose off, sell and convey” various issued patents, including the patent in suit. Importantly, Adams –OTG’s current CEO – was OTC’s CEO at the time the DPA allegedly was executed and the DPA was directed to the registered address of OTC – not OTG. Although the Court previously granted default judgment in connection with OTG’s ownership claims of the patent-in-suit against OTC, the issue of ownership still remains in this case. If OTG’s assertions were correct, that the default judgment against OTC precluded Universal from arguing that OTG lacks right, title, and interest in the patents-in-suit, by the same logic, OTG should be precluded from asserting infringement and validity of the patent’s based upon the Court’s entry of default judgment in favor of Universal against OTC to that same effect. In short, OTG continues to misinterpret the Court’s recent orders relating to the default judgment in an apparent effort to deprive Universal of its rightful defenses in this action.” [Exhibit J, “JOINT RULE 26(f),” Page 11]

“To further confound the matter of ownership, however, Margolin, the alleged inventor of the patented technology, by his own belated admission, back-dated a purported “Patent Assignment” to Optima (OTG) by more than three years in an apparent attempt to create the appearance that the patents-in-suit were properly transferred to Optima. Margolin had ‘fraudulently’ back-dated the assignment of the patents-in-suit to Optima.” [Exhibit J, “JOINT RULE 26(f),” Page 12]

In May 2009, Robert Adams’ previous law firm, Udall, Law Firm, L.L.P, received a default judgment against Adams, that ordered that Optima Technology Group, Inc., (“OTG”) and Robert Adams to pay \$46,446.10 plus pre-judgment interest at a rate of 10% from July 18, 2008.” [Exhibit L, “DEFAULT JUDGMENT AGAINST ADAMS”]

During the Arizona-based Case of Universal Avionics Systems vs. Optima Technology Group, Inc., (Jed Margolin & Robert Adams), Reza Zandian’s attorney John

Peter Lee of Las Vegas, Nevada maintained clear communications with Greenberg Traurig, LLP, the attorneys for Universal Avionics Systems Corporation.

On January 4th, 2008, John Peter Lee emailed Scott J. Bornstein informing him:

“I have conferred with our client, Reza Zandian, in control of Optima Technology Corporation (OTC), also designated as Optima Technology, Inc., and have advised him concerning your reaction to our being dismissed from the captioned litigation. Mr. Zandian is not interested in granting Universal a free license; neither does he wish to enmesh Optima in what promises to be a complex and unproductive Arizona litigation.

Optima Technology Corporation (Optima Technology, Inc.) was originally formed in the State of California and has had no business ties to the State of Arizona. The Complaint alleges, however, that Optima, through Robert Adams, committed wrongful acts in Arizona. However, the Complaint and the attached documentation to the Complaint indicates that the wrongful acts were attributable to Optima Technology Group, a non-existent entity. Although Robert Adams was at one time an officer of Optima, he was removed from this position in October of 2006, and has had no relationship with Optima during the time span referred by you in your Complaint encompassing July, 2007 to November, 2007. In fact, Optima has a judgment against Adams, a copy of which, we understand you already have. Adams, although he may have represented Optima before October, 2006 has had absolutely no contact with Optima since that time, and certainly was not authorized to harass Universal in Arizona or any place else.

We are troubled with the allegations of the Complaint, which apparently have been framed to give personal jurisdiction in the Arizona courts over Optima. However, as already stated, there is no support for the jurisdictional allegations attempting to tie Optima to Arizona.

Optima cannot afford financially or legally to become involved in the Arizona litigation. The Complaint as drafted is a quagmire with too many traps, which

could mesh Optima in an extremely costly and non-productive litigation over issues with simply don't belong in the Arizona courts.

We request, since you are on notice of the true facts in this case, that you dismiss Optima Technology Corporation from the Complaint and Optima gives you notice pursuant to FRCP 11 that this process should be done immediately...we intend no further proceedings at this point.”

-John Peter Lee, Esq. [Exhibit K]

John Peter Lee's assertion that Optima Technology Corporation and Optima Technology Inc., are in fact the same entity, is also shared by OTC's tenured CPA. Optima's publically certified public accountant (CPA) since 1990, Mr. Bijan Akhavan, commonly referred to Optima Technology Corporation as Optima Technology Inc. This is demonstrated in the Employer's Quarterly Federal Tax Return, dated September 30, 2004, [Exhibit G] and throughout various tax documents filed by Mr. Akhavan for U.S administration [Exhibit G].

Additionally in a February 19th, 2008 email from John Peter Lee to Reza Zandian, John Peter Lee states:

“We have determined that it would be unprofitable to appear in the Arizona action brought by Adams, et al. Accordingly, we will not do so. We both believe that the case will implode, and that we will deal with Bornstein to resolve the cases.”

-John Peter Lee, Esq. [Exhibit K]

Based on communications between John Peter Lee and Greenberg Traurig, it was clear that Universal Avionics had been made aware of the fact that Reza Zandian and Optima Technology Corporation (OTC) were the true legitimate owners of the patents in question. In an attempt to settle with Reza Zandian, Universal Avionics Systems sent Reza Zandian a “Patent License and Settlement Agreement,” in which “Universal agrees to provide Optima with cooperation and assistance in Optima's efforts at licensing the Optima Patents to third parties, with Optima receiving 85% and Universal receiving 15% thereof,” [Exhibit K, “PATENT LICENSE AND SETTLEMENT AGREEMENT”]. Exhibit K, “STIPULATOIN AND ORDER OF DISMISSAL,” illustrates that Universal

Avionics Systems Corporation intended to dismiss Optima Technology Corporation (“OTC”) and its sole officer Reza Zandian from the Arizona Case. Furthermore, Reza Zandian met with Derek at the offices of Greenberg Traurig, LLP, in Santa Monica, California at 10:35AM on June 30, 2008, with the intent of making a deposition in the Case of Universal Avionics Systems vs. Optima Technology Group, Inc., Optima Technology Corporation, and Jed Margolin [Exhibit K]. However, Greenberg Traurig refused to take the deposition and relevant documents from Reza Zandian.

5. ALL CLAIMS BY THE PLAINTIFF HAVE ALREADY BEEN DISMISSED IN COURT

On September 23rd, 2008, United States District Judge Raner C. Collins ordered that Case No. CV 07-588-TUC-RCC, Universal Avionics systems Corporation vs. Optima Technology Group, Inc., et al., be closed. The motion reads:

“IT IS HEREBY ORDERED all claims and counterclaims in this action are dismissed with prejudice and the Clerk shall CLOSE this case.

IT IS FURTHER ORDERED that each party shall be responsible for paying its own attorneys’ fees and costs incurred in this action.

Dated this 23rd day of September, 2008.”

-US District Judge Raner C. Collins [Exhibit J, “ORDER”]

US District Judge Raner C. Collins describes Margolin’s fraudulently backdated patents as “*invalid and unenforceable*,” [Exhibit J, “ORDER”]. Judge Raner C. Collins goes on to state that:

“Optima Technology Group’s Default Judgment resolved the issue between Optima Technology Group and Optima Technology Corporation in the exact same way Universal’s Default Judgment resolves the issues between Universals and Optima Technology Corporation.”

-US District Judge Raner C. Collins [Exhibit J, “ORDER”]

Your Honor,

Out of fairness concerning the true nature, merit, and motives of this case, I implore you to dismiss these baseless lawsuits by the Plaintiff, Jed Margolin, who simply put, is trying to fraudulently extort me out of \$1,495,775.74 and \$1,286,552.46.

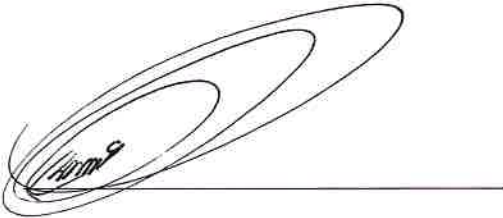
In Pursuit of Fairness, with Great Respect, and Deep Sincerity,

REZA ZANDIAN

Your Honor,

Out of fairness concerning the true nature, merit, and motives of this case, I implore you to dismiss these baseless lawsuits by the Plaintiff, Jed Margolin, who simply put, is trying to fraudulently extort me out of \$1,495,775.74 and \$1,286,552.46.

In Pursuit of Fairness, with Great Respect, and Deep Sincerity,

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

REZA ZANDIAN
Defendant

**6 RUE EDOUARD FOURNIER
PARIS, FRANCE 75116 FR**

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,

Appellant,

vs.

JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY
KNOWN AS BIG SPRING RANCH,
LLC, A NEVADA LIMITED
LIABILITY COMPANY; FRED SADRI,
TRUSTEE OF THE STAR LIVING
TRUST; RAY KOROGHLI AND ELIAS
ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839

District Court No. A635430

Due Date: April 5, 2013

CIVIL PROPER PERSON
TRANSCRIPT REQUEST FORM

*Gholamreza Zandian Jazi, A/K/A
Reza Zandian*

6, rue Edouard Fournier

75116 Paris, France

Appellant in Proper Person

Appellant

Ryan E. Johnson/Watson Rounds
10000 W. Charleston Blvd., Ste 240
Las Vegas, NV 89134

*Johnson Spring Water Company,
LLC F/K/A Big Spring Ranch,
LLC*

*Fred Sadri, Trustee of the Star
Living Trust*

Stanley W. Parry/Ballard Spahr
Andrews & Ingersoll

Ray Koroghli

Elias Abrishami

PO Box 10476

Beverly Hills CA 90213-4018:

Respondent in Proper Person

Respondents

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,

Appellant,

vs.

JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY
KNOWN AS BIG SPRING RANCH,
LLC, A NEVADA LIMITED
LIABILITY COMPANY; FRED SADRI,
TRUSTEE OF THE STAR LIVING
TRUST; RAY KOROGHLI AND ELIAS
ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court No. A635430
Due Date: April 30, 2013

CIVIL PROPER PERSON APPEAL STATEMENT

*Gholamreza Zandian Jazi, A/K/A
Reza Zandian*

6, rue Edouard Fournier
75116 Paris, France
Appellant in Proper Person

Appellant

Ryan E. Johnson/Watson Rounds
10000 W. Charleston Blvd., Ste 240
Las Vegas, NV 89134
*Johnson Spring Water Company,
LLC F/K/A Big Spring Ranch,
LLC*

*Fred Sadri, Trustee of the Star
Living Trust*

Stanley W. Parry/Ballard Spahr
Andrews & Ingersoll
Ray Koroghli

Elias Abrishami
PO Box 10476
Beverly Hills CA 90213-4018:
Respondent in Proper Person

Respondents

1 NPNR
2 REZA ZANDIAN
3 6, rue Edouard Fournier
4 75116 Paris, France
5 Pro Per Appellant

DISTRICT COURT

CLARK COUNTY, NEVADA

6 GHOLAMREZA ZANDIAN JAZI, also
7 known as REZA ZANDIAN, individually,

CASE NO.: A-11-635430-C
DEPT. NO.: IV

8 Plaintiff,

9 v.

10 FIRST AMERICAN TITLE COMPANY, a
11 Nevada business entity; JOHNSON SPRING
12 WATER COMPANY, LLC, formerly known
13 as BIG SPRING RANCH, LLC, a Nevada
14 Limited Liability Company, FRED SADRI,
15 Trustee of the Star Living Trust, RAY
16 KOROGHLI, individually, and ELIAS
17 ABRISHAMI, individually,

18 Defendants.

19 AND ALL RELATED COUNTERCLAIMS
20 AND THIRD-PARTY CLAIMS

21 1334.024072-td

NOTICE OF POSTING COST BOND

22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that with the filing of the Notice of Appeal herein, Plaintiff is
24 posting Five Hundred Dollars (\$500.00) as cost bond pursuant to NRAP 7.

25 DATED this __ day of March, 2013.

26 BY: _____

27 REZA ZANDIAN
28 6, rue Edouard Fournier
75116 Paris, France
Pro Per Appellant

1 CERTIFICATE OF MAILING

2 I HEREBY CERTIFY that on the ___ day March, 2013, I served a copy of the above and
3 foregoing NOTICE OF POSTING COST BOND, upon the appropriate parties hereto, by enclosing
4 it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully
5 prepaid addressed to:

6 Stanley W. Parry
100 North City Parkway, Ste. 1750
7 Las Vegas, Nevada 89106

8 ~~Elias Abrishami~~
P.O. Box 10476
9 Beverly Hills, California 90213

10 Ryan E. Johnson, Esq.
Watson & Rounds
11 10000 W. Charleston Blvd. Ste. 240
Las Vegas, Nevada 89135
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**IN THE SUPREME COURT OF THE STATE OF NEVADA
OFFICE OF THE CLERK**

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,

vs.

JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court Case No. A635430

RECEIPT FOR DOCUMENTS

TO: Gholamreza Zandian Jazi A.K.A Reza Zandian
Watson Rounds/Ryan E. Johnson
Ballard Spahr Andrews & Ingersoll, LLP/Stanley W. Parry
Elias Abrishami
Steven D. Grierson, Eighth District Court Clerk

You are hereby notified that the Clerk of the Supreme Court has received and/or filed the following:

03/21/2013	Filing fee due for Appeal. Filing fee will be forwarded by the District Court.
03/21/2013	Filed Notice of Appeal/Proper Person Pilot Program. Filed certified copy of proper person notice of appeal. (Pilot program civil appeals order and documents mailed to proper person appellant.)

DATE: March 21, 2013

Tracie Lindeman, Clerk of Court
rw

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

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,

vs.

JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839

District Court Case No. A635430

RECEIPT FOR DOCUMENTS

TO: Gholamreza Zandian Jazi
Reza Zandian ✓
Ballard Spahr Andrews & Ingersoll, LLP/Stanley W. Parry
Watson Rounds/Ryan E. Johnson
Elias Abrishami
Steven D. Grierson, Eighth District Court Clerk

You are hereby notified that the Clerk of the Supreme Court has received and/or filed the following:

03/22/2013 Filing Fee Paid. \$250.00 from John Peter Lee. Check No. 40669.

DATE: March 22, 2013

Tracie Lindeman, Clerk of Court
sw

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

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,
vs.

Supreme Court No. 62839
District Court Case No. A635430

JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

RECEIPT FOR DOCUMENTS

TO: Gholamreza Zandian Jazi ✓
Reza Zandian
Ballard Spahr Andrews & Ingersoll, LLP/Stanley W. Parry
Watson Rounds/Ryan E. Johnson
Elias Abrishami
Steven D. Grierson, Eighth District Court Clerk

You are hereby notified that the Clerk of the Supreme Court has received and/or filed
the following:

03/22/2013 Filing Fee Paid. \$250.00 from John Peter Lee. Check No. 40669.

DATE: March 22, 2013

Tracie Lindeman, Clerk of Court
sw

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF: GOLD CANYON
DEVELOPMENT, LLC, A NEVADA LIMITED
LIABILITY COMPANY,

Supreme Court No. 61393
District Court Case No. 11OC004151B

REZA ZANDIAN,
Appellant,
vs.
ELIAS ABRISHAMI; AND RAFI ABRISHAMI,
Respondents.

REMITTITUR

TO: Alan Glover, Carson City Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: June 17, 2013

Tracie Lindeman, Clerk of Court

By: Rory Wunsch
Deputy Clerk

cc (without enclosures):

Hon. James E. Wilson, District Judge
Reza Zandian
J.M. Clouser & Associates, Ltd./Justin M. Clouser

RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on _____.

District Court Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,
vs.
JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court Case No. A635430

REMITTITUR

TO: Steven D. Grierson, Eighth District Court Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: June 28, 2013

Tracie Lindeman, Clerk of Court

By: Rory Wunsch
Deputy Clerk

cc (without enclosures):

Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Ballard Spahr, LLP
Elias Abrishami

RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on _____.

District Court Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN, INDIVIDUALLY,
Appellant,
vs.
JOHNSON SPRING WATER COMPANY, LLC,
FORMERLY KNOWN AS BIG SPRING
RANCH, LLC, A NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE OF THE
STAR LIVING TRUST; RAY KOROGHLI AND
ELIAS ABRISHAMI, INDIVIDUALLY,
Respondents.

Supreme Court No. 62839
District Court Case No. A635430

REMITTITUR

TO: Steven D. Grierson, Eighth District Court Clerk

Pursuant to the rules of this court, enclosed are the following:

Certified copy of Judgment and Opinion/Order.
Receipt for Remittitur.

DATE: June 28, 2013

Tracie Lindeman, Clerk of Court

By: Rory Wunsch
Deputy Clerk

cc (without enclosures):

Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Ballard Spahr, LLP
Elias Abrishami

RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the
REMITTITUR issued in the above-entitled cause, on _____.

District Court Clerk


Service Requested



02 1M
0004287933 JUN 28 2013
MAILED FROM ZIP CODE 89701

GHOLAMREZA ZANDIAN JAZI
6, RUE EDOUARD FOURNIER
75116 PARIS, FRANCE

0011030001

1494
E COURT OF NEVADA
OFFICE OF THE CLERK
Carson Street, Suite 201
Las Vegas City, Nevada 89701


Service Requested


UNITED STATES POSTAGE

FITNEY BOWLES
02 1M \$ 00.46
0004287933 JUN 17 2013
MAILED FROM ZIP CODE 89701

REZA ZANDIAN
6, RUE EDOUARD FOURNIER
75116 PARIS, FRANCE

0011030001

OFFICE OF THE CLERK
S. Carson Street, Suite 201
Las Vegas City, Nevada 89701

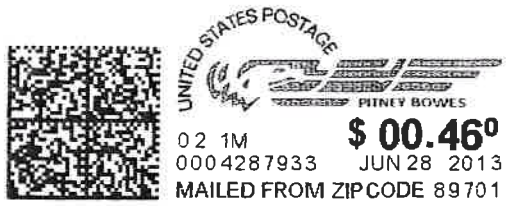

Service Requested


UNITED STATES POSTAGE

FITNEY BOWLES
02 1M \$ 00.46
0004287933 JUN 28 2013
MAILED FROM ZIP CODE 89701

REZA ZANDIAN
6, RUE EDOUARD FOURNIER
75116 PARIS, FRANCE

0011030001



GHOLAMREZA ZANDIAN JAZI
6, RUE EDOUARD FOURNIER
75116 PARIS, FRANCE

0011030001 ||||| |||| | || |

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF: GOLD CANYON
DEVELOPMENT, LLC, A NEVADA
LIMITED LIABILITY COMPANY,

No. 61393

REZA ZANDIAN,

Appellant,

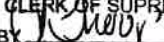
vs.

ELIAS ABRISHAMI; AND RAFI
ABRISHAMI,

Respondents.

FILED

MAY 23 2013

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK

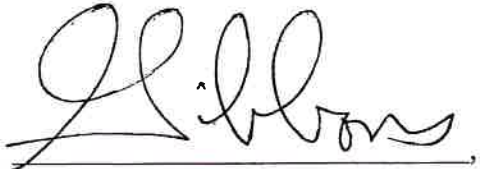
ORDER DISMISSING APPEAL AS ABANDONED

This court previously granted an unopposed motion to withdraw as attorney of record filed by former counsel for appellant. As cause for that motion, counsel cited to appellant's "lack of communication with [counsel's] office." Counsel provided this court with appellant's last known address. In our order granting that motion, we directed appellant to retain new counsel or to inform this court in writing if he would not be retaining new counsel. The copy of the order that was mailed to appellant was returned to this court by the United States Postal Service and marked as "UNABLE TO FORWARD."

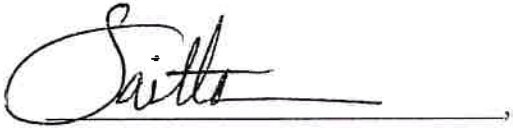
Appellant has not provided counsel or this court with a valid mailing address or other contact information, and has not otherwise contacted this court. Thus it appears that appellant has

abandoned this appeal. Accordingly, we dismiss this appeal as abandoned.

It is so ORDERED.


_____, J.
Gibbons


_____, J.
Douglas


_____, J.
Saitta

cc: Hon. James E. Wilson, District Judge
Robert L. Eisenberg, Settlement Judge
John Peter Lee, Ltd.
Reza Zandian ✓
J.M. Clouser & Associates, Ltd.
Carson City Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,

Appellant,

vs.

JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY KNOWN
AS BIG SPRING RANCH, LLC, A

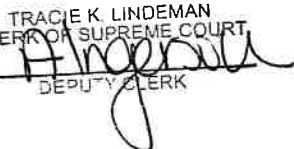
NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE
OF THE STAR LIVING TRUST; RAY
KOROGHLI AND ELIAS ABRISHAMI,
INDIVIDUALLY,

Respondents.

No. 62839

FILED

JUN 03 2013

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK


ORDER DISMISSING APPEAL

When this appeal was docketed, this court gave proper person appellant 40 days to file and serve the proper person litigant forms. Those forms were due in this court by April 30, 2013. To date, appellant has failed to file the required forms or otherwise respond to this court's directive. Accordingly, we conclude that appellant has abandoned this appeal, and we

ORDER this appeal DISMISSED.


_____, J.
Gibbons


_____, J.
Douglas


_____, J.
Saitta

cc: Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Elias Abrishami
Ballard Spahr, LLP
Eighth District Court Clerk


IN THE SUPREME COURT OF THE STATE OF NEVADA

GHOLAMREZA ZANDIAN JAZI, ALSO
KNOWN AS REZA ZANDIAN,
INDIVIDUALLY,
Appellant,
vs.
JOHNSON SPRING WATER
COMPANY, LLC, FORMERLY KNOWN
AS BIG SPRING RANCH, LLC, A
NEVADA LIMITED LIABILITY
COMPANY; FRED SADRI, TRUSTEE
OF THE STAR LIVING TRUST; RAY
KOROGHLI AND ELIAS ABRISHAMI,
INDIVIDUALLY,
Respondents.

No. 62839

FILED

JUN 03 2013

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY 
DEPUTY CLERK


ORDER DISMISSING APPEAL

When this appeal was docketed, this court gave proper person appellant 40 days to file and serve the proper person litigant forms. Those forms were due in this court by April 30, 2013. To date, appellant has failed to file the required forms or otherwise respond to this court's directive. Accordingly, we conclude that appellant has abandoned this appeal, and we

ORDER this appeal DISMISSED.


_____, J.
Gibbons


_____, J.
Douglas


_____, J.
Saitta

cc: Hon. Kerry Louise Earley, District Judge
Gholamreza Zandian Jazi
Reza Zandian
Watson Rounds
Elias Abrishami
Ballard Spahr, LLP
Eighth District Court Clerk

Exhibit B



Secretary of State
Business Programs Division

1500 11th Street
P.O. Box 944230
Sacramento, CA 94244-2300

Statement of Information
(916) 657-5448

REZA ZANDIAN
PO BOX 927674
SAN DIEGO CA 92192-7674

February 02, 2011

RE: C1565687
OPTIMA TECHNOLOGY CORPORATION

In response to your request, the penalty assessed against the above-referenced entity for failure to file the required Statement of Information cannot be waived based on the information provided.

The reason(s) stated in your request do not justify failure to file the required statement.

The penalty is due and payable to the California Franchise Tax Board according to the instructions set forth in the California Franchise Tax Board's Notice of Balance Due. Questions regarding payment should be directed to the California Franchise Tax Board, P.O. Box 942857, Sacramento, CA 94257-0540 or by calling (800) 852-5711.

For more information, go to www.leginfo.ca.gov/calaw.html and see California Corporations Code sections 1502, 2117, 2204, 2206, 6210, 6810, 8210, 8810, 9660, 9690, 12570, 12670, 17060, 17651, 17653, 17655; California Civil Code section 1363.6; California Financial Code section 14101.6; California Food and Agricultural Code section 54040; and California Revenue and Taxation Code section 19141.

Business Programs Division
Statement of Information Unit

