

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed  
Apr 20 2021 09:51 a.m.  
Elizabeth A. Brown  
Clerk of Supreme Court

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 X

REZA ZANDIAN  
6 RUE EDOUARD FOURNIER  
75116 PARIS FRANCE

BROWNSTEIN HYATT FARBRE  
SCHRECK, LLP/RENO  
5371 KIETZKE LANE  
RENO, NV 89511

APPELLANT IN PROPER PERSON

ATTORNEYS FOR RESPONDENT



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

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**DECLARATION OF ADAM P. McMILLEN**

I, ADAM P. McMILLEN, declare under the penalty of perjury that the foregoing costs and fees are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed.

DATED: April 2, 2014.



ADAM P. McMILLEN  
Attorney for Plaintiff Jed Margolin

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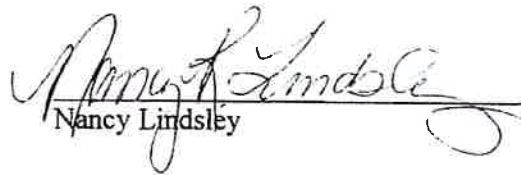
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**CERTIFICATE OF SERVICE**

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, **FIRST MEMORANDUM OF POST-JUDGMENT COSTS AND FEES**, 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: April 2<sup>nd</sup>, 2014

  
Nancy Lindsley

**Exhibit 2**

**Exhibit 2**

2253



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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,

13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make

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return to this writ within not less than 10 days or more than 60 days endorsed thereon with what you have done.

Debtor's real property in Washoe County is described as follows:

Washoe County APN: 079-150-09  
Situs: State Route 447  
Legal Description: The Northeast ¼ and the South ½ of the Northwest ¼ and the South ½ in Section 33, Township 21, Range 23 East, M.D.B.&M.

DATED: this \_\_\_\_\_ day of April, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

2256

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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:  
16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make

2258

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 079-150-10  
5 Situs: State Route 447  
6 Legal Description: Section 31, Township 21 North, Range 23 East,  
M.D.B.&M

7 DATED: this \_\_\_\_\_ day of April, 2014.

8 ALAN GLOVER, Clerk

9 By: \_\_\_\_\_, Deputy  
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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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

22460

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make  
26  
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28



1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 079-150-13  
5 Situs: State Route 447  
6 Legal Description: The Northeast ¼; South ½ of the Northwest ¼; South ½  
7 of Section 27, Township 21 North, Range 23 East,  
8 M.D.B.&M.

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy  
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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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,

13 Plaintiff,

14 vs.

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

22 Defendants.  
23

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make  
26

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 079-150-12  
5 Situs: State Route 447  
6 Legal Description: The Southwest Quarter (SW ¼) of Section 25, Township  
7 21 North, Range 23 East, M.D.M.

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy  
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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*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

22160

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make  
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28

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 084-040-02  
5 Situs: Pierson Canyon Road  
6 Legal Description: Section 5, Township 20 North, Range 23 East,  
7 M.D.B.&M.

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy  
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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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:



1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12

13 \$93,315.40 as accrued costs, accrued interest, and fees.

14 Credit must be given for payments and partial satisfactions in the amount of  
15 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
16 excess credited against the judgment as entered, leaving a net balance of:

17 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
18 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
19 from the date of judgment to the date of levy, to which must be added the commissions and  
20 costs of the officer executing this writ.  
21

22 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
23 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
24 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
25 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
26 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
27 found, then out of the real property belonging to the debtor in the aforesaid county, and make  
28

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 084-040-04  
5 Situs: E Interstate 80  
6 Legal Description: Section 3, Township 20 North, Range 23 East,  
7 M.D.B.&M.

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy  
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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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,

13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make  
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27  
28

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 084-040-06  
5 Situs: E Interstate 80  
6 Legal Description: Section 1, Township 20 North, Range 23 East,  
M.D.B.&M.

7 DATED: this \_\_\_\_\_ day of April, 2014.

8 ALAN GLOVER, Clerk

9 By: \_\_\_\_\_, Deputy  
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1 Matthew D. Francis (6978)  
Adam P. McMillen (10678)  
2 WATSON ROUNDS  
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3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,

13 Plaintiff,

14 vs.

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

22 Defendants.  
23

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make  
26  
27  
28

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 084-040-10  
5 Situs: E Interstate 80  
6 Legal Description: The North 1/2 and the North 1/2 of the Northwest 1/4 of the  
7 Southwest 1/4 and the Southwest 1/4 of the Northwest 1/4 of  
8 the Southwest 1/4 and the North 1/2 of the Northeast 1/4 of  
9 the Southwest 1/4 and the North 1/2 of the Northwest 1/4 of  
10 the Southeast 1/4 all in Section 11, Township 20 North,  
11 Range 23 East, M.D.B.&M.

12 DATED: this \_\_\_\_\_ day of April, 2014.

13 ALAN GLOVER, Clerk

14 By: \_\_\_\_\_, Deputy



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*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 084-130-07  
5 Situs: E Interstate 80  
6 Legal Description: The Northwest ¼ and the North ½ of the Southwest ¼  
7 and the Government Lot 1 in the Southwest ¼ of Section  
8 15, Township 20 North, Range 23 East, M.D.B.&M.

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy  
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1 Matthew D. Francis (6978)  
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3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5

6  
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8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
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6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
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10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
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13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 prescribed by section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C.  
23 §206(a)(1), and in effect at the time the earnings are payable, whichever is greater, is exempt  
24 from any levy of execution pursuant to this writ, and if sufficient personal property cannot be  
25 found, then out of the real property belonging to the debtor in the aforesaid county, and make

1 return to this writ within not less than 10 days or more than 60 days endorsed thereon with  
2 what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Washoe County APN: 084-140-17  
5 Situs: E Interstate 80  
6 Legal Description: The Northeast ¼ of Section 15, Township 20 North,  
7 Range 23 East, M.D.B.&M.

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy  
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3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5

6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Constable of Clark County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
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8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
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13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, CONSTABLE OF CLARK**, you are hereby commanded to  
21 satisfy this judgment with interest and costs as provided by law, out of the prescribed by  
22 section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C. §206(a)(1), and in  
23 effect at the time the earnings are payable, whichever is greater, is exempt from any levy of  
24 execution pursuant to this writ, and if sufficient personal property cannot be found, then out of  
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2285



1 the real property belonging to the debtor in the aforesaid county, and make return to this writ  
2 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

3 Debtor's real property in Washoe County is described as follows:

4 Clark County APN: 071-02-000-005  
5 Situs: Moapa Valley  
6 Legal Description: PT NE4 NE4 SEC 02 16 68  
7 Section 02, Township 16, Range 68

8 DATED: this \_\_\_\_\_ day of April, 2014.

9 ALAN GLOVER, Clerk

10 By: \_\_\_\_\_, Deputy

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3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Constable of Clark County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,495,775.74 (sic) the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$34,787.50 attorney's fees,  
9 \$59,595.39 accrued interest, and  
10 \$1,922.59 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$93,315.40 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,592,091.22 actually due on the date of the issuance of this writ of which  
17 \$1,592,091.22 bears interest at 5.25% percent per annum, in the amount of \$228.99 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, CONSTABLE OF CLARK**, you are hereby commanded to  
21 satisfy this judgment with interest and costs as provided by law, out of the prescribed by  
22 section 6(a)(1) of the federal Fair Labor Standards Act of 1938, 29 U.S.C. §206(a)(1), and in  
23 effect at the time the earnings are payable, whichever is greater, is exempt from any levy of  
24 execution pursuant to this writ, and if sufficient personal property cannot be found, then out of  
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the real property belonging to the debtor in the aforesaid county, and make return to this writ within not less than 10 days or more than 60 days endorsed thereon with what you have done.

Debtor's real property in Washoe County is described as follows:

|                    |  |
|--------------------|--|
| Clark County APN:  | 071-02-000-013   |
| Situs:             | Moapa Valley   |
| Legal Description: | PT SE4 NE4 SEC 02 16 68<br>Section 02, Township 16, Range 68 |

DATED: this \_\_\_\_\_ day of April, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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 APR -2 PM 4: 06

ALAN GLOVER  
BY                      CLERK  
                                    DEPUTY

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

11 JED MARGOLIN, an individual,  
12 Plaintiff,

Case No.: 090C00579 1B

Dept. No.: 1

13 vs.

**FIRST MEMORANDUM OF POST-  
JUDGMENT COSTS AND FEES**

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

21 Defendants.

23 Judgment having been entered in the above entitled action on June 24, 2013 against  
24 Defendants, jointly and severally, Plaintiff Jed Margolin, by and through his counsel of record,  
25 Adam P. McMillen, Esquire of Watson Rounds, P.C., submits Plaintiff's First Memorandum  
26 of Post-Judgment Costs and Fees and requests the Clerk tax such costs and fees, as follows:

27 POST-JUDGMENT ATTORNEYS' FEES  
28 (JUNE 24, 2013 THROUGH MARCH 26, 2014) ..... \$ 34,787.50

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**COSTS (JUNE 24, 2013 THROUGH MARCH 26, 2014):**

|   |           |                    |
|---|-----------|--------------------|
| • Postage/photocopies (in-house)        | \$ 619.75 |                    |
| • Fees (filing fees and recording fees) | 154.00    |                    |
| • Research                              | 271.46    |                    |
| • Witness Fees (Subpoenas)              | 444.38    |                    |
| • Process service/courier fees          | 433.00    |                    |
|   |           | <u>\$ 1,922.59</u> |

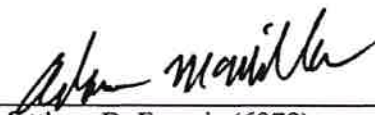
**TOTAL:** \$ 36,710.09

**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: April 2, 2014.

WATSON ROUNDS, P.C.

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*

**DECLARATION OF ADAM P. MCMILLEN**

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I, ADAM P. McMILLEN, declare under the penalty of perjury that the foregoing costs and fees are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed.

DATED: April 2, 2014.



ADAM P. McMILLEN  
Attorney for Plaintiff Jed Margolin

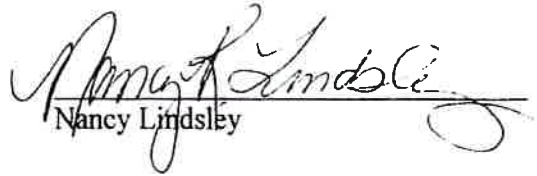
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**CERTIFICATE OF SERVICE**

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, **FIRST MEMORANDUM OF POST-JUDGMENT COSTS AND FEES**, 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: April 2<sup>nd</sup>, 2014

  
Nancy Lindsley



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 APR -9 PM 4:09

ALAN GLOVER  
BY *[Signature]* 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,

Case No. 09OC00579 1B  
Dept. No. I

18 Defendants.

19  
20 **MOTION TO RETAX AND SETTLE COSTS**

21 COMES NOW, Defendant REZA ZANDIAN ("ZANDIAN"), by and through his  
22 attorneys, Kaempfer Crowell, and hereby moves this Court to retax and settle the costs  
23 in the above-referenced proceeding. This *Motion* is made pursuant to NRS 18.110(4),  
24 18.160(3), and NRS 18.170, and is based on NRS 18.005, 18.020, 18.050, 18.110, 18.160  
and 18.170, the attached memorandum of points and authorities, all papers and

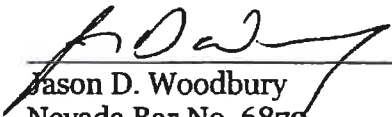
KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

2294

1 pleadings on file in this matter and any evidence received and arguments entertained by  
2 the Court at any hearing on this *Motion*.

3 DATED this 8<sup>th</sup> day of April, 2014.

4 **KAEMPFER CROWELL**

5  
6   
7 Jason D. Woodbury  
8 Nevada Bar No. 6870  
9 510 West Fourth Street  
10 Carson City, Nevada 89703  
11 Telephone: (775) 884-8300  
12 Facsimile: (775) 882-0257  
13 JWoodbury@kcnvlaw.com  
14 ***Attorneys for Reza Zandian***

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KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

2295

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Relevant Procedural Background<sup>1</sup>**

3 On September 24, 2012, this Court entered a default against Defendant, Optima  
4 Technology Corporation, a California corporation, and Optima Technology Corporation,  
5 a Nevada corporation (collectively referred to as "OTC").<sup>2</sup> On September 27, 2012,  
6 Plaintiff served notice that the default against OTC had been entered.<sup>3</sup> A month later,  
7 Plaintiff applied for default judgment against OTC, which was granted on October 31,  
8 2012.<sup>4</sup> Notice of the entry of default judgment against OTC was filed on November 6,  
9 2012.<sup>5</sup>

10 This Court entered a default against ZANDIAN on March 28, 2013 and notice of  
11 the default was filed April 5, 2013.<sup>6</sup> Plaintiff subsequently applied for default judgment,  
12 the application was granted and notice of the default judgment was filed on June 27,  
13 2013.<sup>7</sup>

14 Later, beginning in December 2013 and culminating with this Court's denial in  
15 February, 2014, ZANDIAN attempted to have the default judgment against him set  
16 aside.<sup>8</sup> The case has been appealed, and the appeal is pending.<sup>9</sup> On April 2, 2014,

17  
18 <sup>1</sup> The presentation of the procedural background material to this *Motion* is not intended and should not be  
19 construed as an admission that there were not procedural deficiencies in regard to the proceedings  
20 recited. That is to say, for instance, that a representation that a "notice" was made is not intended as a  
21 representation that the referenced "notice" was made in a legally valid and procedurally sufficient  
22 manner.

20 <sup>2</sup> See *Default* (Sept. 24, 2012).

21 <sup>3</sup> See *Notice of Entry of Default* (Sept. 27, 2012).

22 <sup>4</sup> See *Application for Default J.* (Oct. 30, 2012); *Default J.* (Oct. 31, 2012).

23 <sup>5</sup> See *Notice of Entry of J.* (Nov. 6, 2012).

24 <sup>6</sup> See *Default* (Mar. 28, 2013); *Amended Not. of Entry of Default* (April 5, 2013).

<sup>7</sup> See *Application for Default J.* (April 17, 2013); *Default J.* (June 24, 2013); *Notice of Entry of Default J.*  
(June 27, 2013).

<sup>8</sup> See generally, *Order Denying Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza  
Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghonoreza Zandian Jazi's Motion to Set  
Aside Default Judgment* (Feb. 6, 2014).

2295

1 Plaintiff served by mail a document entitled *First Memorandum of Post-Judgment*  
2 *Costs and Fees* (“*Memorandum*”). This *Motion* is filed in response.

3 **II. Argument**

4 **A. Plaintiff should be denied costs and fees because the**  
5 ***Memorandum* is procedurally defective.**

6 As a threshold matter, it is not possible to determine whether Plaintiff's  
7 *Memorandum* is presented under NRS 18.110—for costs incurred during the course of  
8 an action—under NRS 18.160—for costs incurred following entry of judgment—or under  
9 NRS 18.170—for costs incurred following entry of judgment which are not specified in  
10 NRS 18.160.<sup>10</sup> On the one hand, the *Memorandum's* reference to “post-judgment”  
11 suggests that its basis is NRS 18.160 or NRS 18.170. But on the other hand, the  
12 *Memorandum* references a request for costs of “postage,” “photocopies,” “filing fees and  
13 recording fees,” “research,” “witness fees” and “process service/courier fees.” None of  
14 those items are identified in NRS 18.160 or NRS 18.170 as costs which may be recovered  
15 following a judgment. Rather, those items are within the definition of “costs” as that  
16 term is used in NRS 18.010.<sup>11</sup> This seems to indicate that the *Memorandum* is  
17 presented under the authority of NRS 18.010. Fortunately, this Court need not resolve  
18 the confusion over the legal basis for the *Memorandum* because regardless of whether  
19 the *Memorandum* is presented under NRS 18.010, NRS 18.160, or NRS 18.170, it is  
20 procedurally defective.

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21 <sup>9</sup> See, e.g., *Notice of Appeal* (Mar. 12, 2014).

22 <sup>10</sup> Plaintiff does not identify the authority upon which he relies for the *Memorandum's* request. The  
23 absence of any authority in the *Memorandum* is, in and of itself, sufficient cause to reject it. See FJDCR  
24 15(5).

<sup>11</sup> See NRS 18.005 which provides in pertinent part: “*For the purposes of NRS 18.010 to 18.150,*  
inclusive, the term ‘costs’ means: 1. Clerks’ fees.... 4. Fees for witnesses at trial, pretrial hearing and  
deposing witnesses .... 7. The fee of any sheriff or licensed process server for the delivery or service of any  
summons or subpoena used in the action.... 12. Reasonable costs for photocopies.... 14. Reasonable  
costs for postage.... 17.... [R]easonable and necessary expenses for computerized services for legal  
research.” (Emphasis added).

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**1. If the Memorandum is presented pursuant to NRS 18.010, it is untimely.**

In pertinent part, NRS 18.110 provides:

The party in whose favor judgment is rendered, and who claims costs, **must** file with the clerk, and serve a copy upon the adverse party, **within 5 days after the entry of judgment**, or such further time as the court or judge may grant, a memorandum of the items of the costs in the action or proceeding....<sup>12</sup>

Notice of the default judgments against OTC and ZANDIAN were filed on November 6, 2012, and June 27, 2013 respectively. The *Memorandum* was not filed within five days after the entry of those judgments. Therefore, it is untimely under NRS 18.110 and the *Motion* should be granted.<sup>13</sup>

While NRS 18.110 does permit a court to grant further time beyond the five days, Plaintiff has not requested that additional time.<sup>14</sup> As such, the *Memorandum* does not satisfy the clear requirements of NRS 18.110(1) and should be denied.

**2. If the Memorandum is presented pursuant to NRS 18.160, it is untimely and requests costs which are not allowed.**

NRS 18.160 provides that a request the recovery of post-judgment costs may be served and filed “at any time or times not more than 6 months after the items have been incurred.”<sup>15</sup> The *Memorandum* of Plaintiff, however, filed April 2, 2014, is a request for costs allegedly incurred from “June 24, 2013 through March 26, 2014.” Even if it applies in these circumstances, the language of NRS 18.160(2) expressly restricts recoverable costs to those “incurred” from October 3, 2013 to April 2, 2014—six months.

<sup>12</sup> NRS 18.110(1) (emphasis added).

<sup>13</sup> See *Securities Inv. Co. v. Donnelley*, 89 Nev. 341, 349, 513 P.2d 1238, 1243 (1973) (affirming denial of costs when memorandum of costs filed more than five days after judgment).

<sup>14</sup> Indeed, it seems notable that even if Plaintiff had requested additional time to serve the *Memorandum*, such request would have almost certainly been rejected. The *Memorandum* is not merely a few days, or even weeks late. It was filed nearly a year and a half after the OTC judgment and over nine months after the ZANDIAN judgment. Such an extraordinary delay cannot conceivably be justified.

<sup>15</sup> NRS 18.160(2).

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1 The *Memorandum* provides no information as to when the costs were incurred.<sup>16</sup>

2 Therefore, the *Motion* should be granted.

3 But even to the extent that the *Memorandum* does requests costs which were  
4 incurred within the six month time frame fixed by NRS 18.160(2), the *Motion* should  
5 still be granted because the *Memorandum* seeks categories of costs which are not  
6 allowed by NRS 18.160(1). In fact, *none* of the costs itemized in the *Memorandum* is  
7 allowed by NRS 18.160(1).<sup>17</sup> As such, NRS 18.160 does not provide Plaintiff a legal basis  
8 to receive the costs he seeks and the *Motion* should be granted.

9 **3. If the Memorandum is presented pursuant to NRS 18.170,**  
10 **it should be rejected because it was not preceded or**  
**accompanied by a motion.**

11 When a party seeks post-judgment costs outside the scope of the categories  
12 specified by NRS 18.160, NRS 18.170 provides the procedure and states, in pertinent  
13 part:

14 A judgment creditor claiming costs or necessary disbursements reasonably  
15 incurred in aid of the collection of a judgment or of any execution issued thereon,  
16 other than those specified in NRS 18.160, including items which have been  
17 disallowed by the judge in the supplemental proceeding, shall serve the adverse  
18 party either personally or by mail, and file, at any time or times not more than 6  
19 months after such item has been incurred and prior to the time the judgment is  
20 fully satisfied, a *notice of motion for an order allowing the same*,  
specifying the items claimed and the amount thereof, and supported by an  
affidavit of the party or the party's attorney or agent stating that to the best of his  
or her knowledge and belief the items are correct and showing that the costs were  
reasonable, and the disbursements reasonably and necessarily incurred. The  
court or judge hearing *such motion* shall make such order respecting the costs  
or disbursements so claimed as the circumstances justify, allowing the same in  
whole or in part, or disallowing the same.

21 In other words, NRS 18.170 requires a procedure different than NRS 18.110 or NRS  
22 18.160 because it concerns costs which are of a different nature. Nevada law allows a  
23

24 <sup>16</sup> Because the time frame—chosen by Plaintiff—commenced “June 24, 2013” presumably, that is when it  
is alleged that post-judgment costs began accruing. As such, clearly some of the costs Plaintiff has  
included are disallowed.

1 prevailing party to request costs by “memorandum” under NRS 18.110 and NRS 18.160  
2 because those provisions are restricted to costs which have been “pre-determined,” in a  
3 sense, to be valid. NRS 18.170, unlike those statutes allows costs beyond those “pre-  
4 determined” categories. However, that statute balances the interests of the parties by  
5 requiring the requesting party to present a “motion” to the Court for approval of the  
6 costs requested.

7 Of course, Plaintiff has not followed that procedure in this case. The requests for  
8 costs is not presented in a motion—complete with a sufficient explanation of the costs  
9 and legal authority for their allowance—but, rather, a memorandum which provides  
10 only the minimal information of a general category of the cost and the alleged amount  
11 incurred for that category. This is grossly insufficient under NRS 18.170 and even the  
12 most liberal construction of the *Memorandum* cannot turn it into a “motion” which  
13 remotely satisfies the letter or purpose of the statute.

14 Consequently, regardless of whether Plaintiff’s legal basis for the Memorandum  
15 is NRS 18.110, NRS 18.160, or NRS 18.170, the *Memorandum* is procedurally and fatally  
16 defective and the *Motion* should be granted.

17 **B. Plaintiff is not entitled to attorneys’ fees even if allowed to  
18 recover costs.**

19 The procedural defects addressed above do not even touch upon the most blatant  
20 deficiency of the *Memorandum*: the request for attorneys’ fees disguised as costs.  
21 Attorneys’ fees are not the same thing as “costs” for purposes of Chapter 18 of Nevada  
22 Revised Statutes.<sup>18</sup> For some unexplained—and unauthorized—reason, however,

23  
24 <sup>17</sup> Compare NRS 18.160(1)(a) – (f) with *Memorandum* at 1:27 – 2:5.

<sup>18</sup> See NRS 18.005, .160.

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ALAN GLOVER

DEPUTY CLERK

1 Plaintiff's *Memorandum* includes a request for \$34,787.50 in "post-judgment attorneys'  
2 fees" as though it was such a cost.

3 Attorneys' fees are not recoverable unless authorized by a statute, rule, or  
4 contractual provision.<sup>19</sup> None provides a legal basis to award Plaintiff's fees as the  
5 *Memorandum* requests.

6 The general statute authorizing recovery of fees by a prevailing party, NRS  
7 18.010, does not apply to the circumstances of this case. Further, there is no evidence  
8 that any offer of judgment was rejected by ZANDIAN or OTC which would trigger a  
9 potential award of fees under any statute or rule of civil procedure. No other rule exists  
10 which would allow Plaintiff to recover fees in this case.<sup>20</sup> The judgments at issue in this  
11 case did not include recovery for attorneys' fees subsequent to the entry of judgment.  
12 And there has never any allegation by Plaintiff that he and OTC and/or ZANDIAN were  
13 parties to *any* contract together—must less any contract which provided for the  
14 recovery of attorneys' fees in this litigation.

15 For these reasons, this Court should reject the *Memorandum* and grant the  
16 *Motion*, and deny Plaintiff's attempt to recover attorneys' fees disguised as costs.

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KAMFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

24 <sup>19</sup> See, e.g., *Horgan v. Felton*, 123 Nev. 577, 170 P.3d 982, 986 (2007).

<sup>20</sup> Indeed, to the extent that a rule applies to this situation, it contravenes the *Memorandum's* request. NRCP 54(d) requires that fees must be requested by motion, that the motion must be filed within 20 days

2300

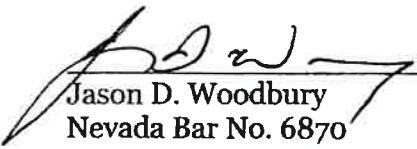


1 **III. Conclusion**

2 For all the reasons hereinabove, it is respectfully requested that this Court grant  
3 this *Motion*.

4 DATED this 7<sup>th</sup> day of April, 2014.

5 **KAEMPFER CROWELL**

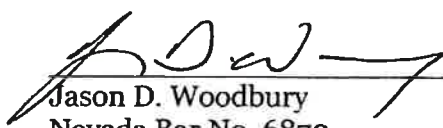
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7   
8 Jason D. Woodbury  
9 Nevada Bar No. 6870  
10 510 West Fourth Street  
11 Carson City, Nevada 89703  
12 Telephone: (775) 884-8300  
13 Facsimile: (775) 882-0257  
14 [JWoodbury@kcnvlaw.com](mailto:JWoodbury@kcnvlaw.com)  
15 ***Attorneys for Reza Zandian***

12 **AFFIRMATION pursuant to NRS 239B.030**

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

15 DATED this 7<sup>th</sup> day of April, 2014.

16 **KAEMPFER CROWELL**

17  
18   
19 Jason D. Woodbury  
20 Nevada Bar No. 6870  
21 510 West Fourth Street  
22 Carson City, Nevada 89703  
23 Telephone: (775) 884-8300  
24 Facsimile: (775) 882-0257  
[JWoodbury@kcnvlaw.com](mailto:JWoodbury@kcnvlaw.com)  
***Attorneys for Reza Zandian***

of the notice of entry of judgment, and that it must "specify" the "statute, rule, or other grounds" authorizing the award of fees. The *Memorandum* does none of these.


**CERTIFICATE OF SERVICE**

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Pursuant to NRCP 5(b), I hereby certify that service of the foregoing **MOTION TO RETAX AND SETTLE COSTS** was made this date by depositing a true copy of the same for mailing at Carson City, Nevada, addressed to each of the following:

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

DATED this 9 day of April, 2014.

  
an employee of Kaempfer Crowell

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

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JASON D. WOODBURY  
Nevada Bar No. 6870  
SEVERIN A. CARLSON  
Nevada Bar No. 9373  
KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703  
Telephone: (775) 884-8300  
Facsimile: (775) 882-0257  
jwoodbury@kcnvlaw.com  
**Attorneys for Defendant,  
REZA ZANDIAN**

REC'D & FILED

2014 APR 17 AM 10:51

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,

us.

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.

Case No. 09 OC 00579 1B

Dept. No. I

**STIPULATION AND ORDER TO WITHDRAW MOTION FILED BY  
REZA ZANDIAN ON MARCH 24, 2014**

COME NOW, WATSON ROUNDS, counsel for Plaintiff, JED MARGOLIN, by and  
through ADAM McMILLEN, and KAEMPFER CROWELL, counsel for Defendant, REZA

KAEMPFER CROWELL  
510 W. Fourth Street  
Carson City, Nevada 89703

2303

1 ZANDIAN, by and through JASON WOODBURY and hereby stipulate that the Motion  
2 filed by REZA ZANDIAN appearing in Proper Person on March 24, 2014, be withdrawn.

3 Dated this 14 day of April, 2014.

Dated this 15<sup>th</sup> day of April, 2014.

4 **WATSON ROUNDS**

**KAEMPFER CROWELL**

5  
6 By: *Adam P. McMillen*  
7 ADAM P. McMILLEN  
8 Nevada Bar No. 10678  
9 5371 Kietzke Lane  
10 Reno, NV 89511  
11 Telephone: (775) 324-4100  
12 Facsimile: (775) 333-8171  
13 Email: [amcmillen@watsonrounds.com](mailto:amcmillen@watsonrounds.com)  
14 **Attorneys for Plaintiff,**  
15 **JED MARGOLIN**

6 By: *J. Woodbury*  
7 JASON D. WOODBURY  
8 Nevada Bar No. 6870  
9 510 West Fourth Street  
10 Carson City, Nevada 89703  
11 Telephone: (775) 884-8300  
12 Facsimile: (775) 882-0257  
13 Email: [jwoodbury@kcnvlaw.com](mailto:jwoodbury@kcnvlaw.com)  
14 **Attorneys for Defendant,**  
15 **REZA ZANDIAN**

16 **IT IS SO ORDERED.**

17 DATED this 17<sup>th</sup> day of April, 2014.

18 *James T. Russell*  
19 JAMES T. RUSSELL  
20 District Judge

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Case 5:14-cv-00111-JCR Document 1-1 Filed 04/15/14 Page 2 of 2


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JASON D. WOODBURY  
Nevada Bar No. 6870  
SEVERIN A. CARLSON  
Nevada Bar No. 9373  
KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703  
Telephone: (775) 884-8300  
Facsimile: (775) 882-0257  
jwoodbury@kcnvlaw.com  
**Attorneys for Defendant,  
REZA ZANDIAN**

REC'D & FILED

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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,  
  
us.  
  
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.

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

**STIPULATION AND ORDER TO WITHDRAW MOTION FILED BY  
REZA ZANDIAN ON MARCH 24, 2014**

COME NOW, WATSON ROUNDS, counsel for Plaintiff, JED MARGOLIN, by and  
through ADAM McMILLEN, and KAEMPFER CROWELL, counsel for Defendant, REZA

KAEMPFER CROWELL  
510 W. Fourth Street  
Carson City, Nevada 89703

2305

1 ZANDIAN, by and through JASON WOODBURY and hereby stipulate that the Motion  
2 filed by REZA ZANDIAN appearing in Proper Person on March 24, 2014, be withdrawn.

3 Dated this 14 day of April, 2014.

Dated this 15<sup>th</sup> day of April, 2014.

4 **WATSON ROUNDS**


**KAEMPFER CROWELL**

5  
6 By:   
7 ADAM P. McMILLEN  
8 Nevada Bar No. 10678  
9 5371 Kietzke Lane  
10 Reno, NV 89511  
11 Telephone: (775) 324-4100  
12 Facsimile: (775) 333-8171  
13 Email: [amcmillen@watsonrounds.com](mailto:amcmillen@watsonrounds.com)  
14 **Attorneys for Plaintiff,**  
15 **JED MARGOLIN**

6 By:   
7 JASON D. WOODBURY  
8 Nevada Bar No. 6870  
9 510 West Fourth Street  
10 Carson City, Nevada 89703  
11 Telephone: (775) 884-8300  
12 Facsimile: (775) 882-0257  
13 Email: [jwoodbury@kcnvlaw.com](mailto:jwoodbury@kcnvlaw.com)  
14 **Attorneys for Defendant,**  
15 **REZA ZANDIAN**

16 **IT IS SO ORDERED.**

17 DATED this 17<sup>th</sup> day of April, 2014.

18   
19 JAMES T. RUSSELL  
20 District Judge

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CARRIS K  
ON OAE  
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89703  
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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 APR 21 PM 3:48  
ALAN GLOVER  
CLERK  
BY *[Signature]*  
REPTIT

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. 09OC00579 1B  
Dept. No. I

19  
20 **OPPOSITION TO MOTION FOR WRIT OF EXECUTION**

21 COMES NOW, Defendant REZA ZANDIAN ("ZANDIAN"), by and through his  
22 attorneys, Kaempfer Crowell, and hereby opposes the *Motion for Writ of Execution*  
23 ("*Motion*") served by mail on April 2, 2014. This *Opposition* is made pursuant to  
24 FJDCR 15(3) and is based on the attached memorandum of points and authorities, all

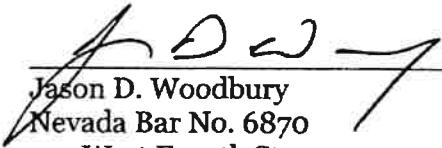
KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

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1 papers and pleadings on file in this matter and any evidence received and arguments  
2 entertained by the Court at any hearing on the *Motion*.

3 DATED this 21<sup>st</sup> day of April, 2014.

4 **KAEMPFER CROWELL**

5  
6   
7 Jason D. Woodbury  
8 Nevada Bar No. 6870  
9 510 West Fourth Street  
10 Carson City, Nevada 89703  
11 Telephone: (775) 884-8300  
12 Facsimile: (775) 882-0257  
13 JWoodbury@kcnvlaw.com  
14 ***Attorneys for Reza Zandian***

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KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703



1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. Procedural Background

3 On June 24, 2013, this Court entered default judgment in the amount of  
4 \$1,495,775.74 in this case.<sup>1</sup> On April 2, 2014, Plaintiff served the instant *Motion*.  
5 Attached to the *Motion* are two exhibits. The first, Exhibit 1, is a document entitled  
6 "*First Memorandum of Post-Judgment Costs and Fees*." The second, Exhibit 2, is  
7 actually a series of documents each entitled "*Writ of Execution*" some of which purport  
8 to be issued to the Sheriff of Washoe County and some of which purport to be issued to  
9 the Constable of Clark County.

10 On April 9, 2014, ZANDIAN filed a *Motion to Retax and Settle Costs* ("*Motion to*  
11 *Retax*") in response to the *First Memorandum of Post-Judgment Costs and Fees*.<sup>2</sup> The  
12 *Motion to Retax* is pending and has not been addressed at this time.

13 II. Argument

14 **A. This Court should deny Plaintiff's *Motion* to issue the proposed**  
15 ***Writs* because they include fees and costs which this Court has**  
16 **not granted.**

17 The proposed *Writs* presented to this Court by Plaintiff include the following  
18 amounts as "sums [which] have accrued since the entry of judgment."<sup>3</sup> Two of these  
19 items, \$34,787.50 in attorney's fees and \$1,022.59 in "accrued costs" reflect the costs

20 <sup>1</sup> See *Default J.* at 2:19 – 3:3 (June 24, 2013). This Court's *Default Judgment* reflects that the judgment  
21 includes "damages, along with pre-judgment interest, attorney's fees and costs." *Id.* at 2:21-22. However,  
22 the *Default Judgment* does not itemize the amount of each category and only reflects a lump sum of  
23 \$1,495,775.74. Plaintiff's proposed *Writ of Execution* does itemize these categories and sums as follows:  
24 "\$900,000.00 principal," "\$83,761.25 attorney's fees", "\$488,545.89 interest, and" "\$24,021.96 costs,  
making a total amount of \$1,495,775.74". *Exhibit 2 to Motion for Writ of Execution* at 2:1-5 (hereinafter  
referred to as "proposed *Writs*"). Adding to the confusion, the sums of the categories listed in Plaintiff's  
proposed writs do not equal what is reported as the "total amount." ( $\$900,000 + \$83,761.25 +$   
 $\$488,545.89 + \$24,021.96 = \$1,497,329.10$  not  $\$1,495,775.74$ ). Plaintiff, however, offers no explanation  
for the discrepancy between the categories and total and, to date, has made no effort to correct any error.  
For this reason alone, this Court should deny the *Motion* and require clarification by Plaintiff. A writ of  
execution must be precise.

<sup>2</sup> See *Motion to Retax and Settle Costs* (April 9, 2014).

1 and fees requested in the *First Memorandum of Post-Judgment Costs and Fees*. Those  
2 fees and costs are disputed and this Court has yet to resolve any dispute as to their  
3 amount. Indeed, there is significant doubt that Plaintiff has any legal basis to recover  
4 post-judgment fees in this case. In any event, however, the proposed *Writs* do not  
5 accurately reflect the previous orders of this Court and should be rejected.

6 More egregious, Plaintiff's proposed *Writs* reflect a higher sum than this Court  
7 has actually awarded—even assuming the adoption of the *First Memorandum of Post-*  
8 *Judgment Costs and Fees*. The proposed *Writs* would have this Court authorize  
9 execution for the total sum of \$1,592,091.22.<sup>4</sup> One would assume that this sum consists  
10 of the amount previously awarded by this Court, \$1,495,775.74, added to the sum  
11 requested in the *First Memorandum of Post-Judgment Costs and Fees*, \$93,315.40.  
12 However, those two figures add up to 1,589,091.14, \$3,000.08 less than the sum  
13 reflected in the proposed *Writs*. No explanation for this is provided in the *Motion*.  
14 Simply, the proposed *Writs* are erroneous on their face and this Court should decline  
15 their issuance.

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<sup>3</sup> Proposed *Writs* at 2:7.

<sup>4</sup> Proposed *Writs* at 2:17-19.

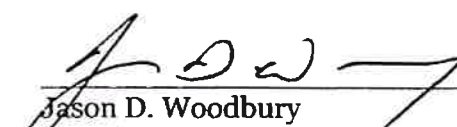
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**III. Conclusion**

For all these reasons explained herein, it is respectfully requested that this Court deny the *Motion*.

DATED this 21<sup>st</sup> day of April, 2014.

**KAEMPFER CROWELL**

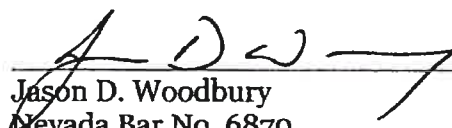
  
\_\_\_\_\_  
Jason D. Woodbury  
Nevada Bar No. 6870  
510 West Fourth Street  
Carson City, Nevada 89703  
Telephone: (775) 884-8300  
Facsimile: (775) 882-0257  
[JWoodbury@kcnvlaw.com](mailto:JWoodbury@kcnvlaw.com)  
***Attorneys for Reza Zandian***

**AFFIRMATION pursuant to NRS 239B.030**

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

DATED this 21<sup>st</sup> day of April, 2014.

**KAEMPFER CROWELL**

  
\_\_\_\_\_  
Jason D. Woodbury  
Nevada Bar No. 6870  
510 West Fourth Street  
Carson City, Nevada 89703  
Telephone: (775) 884-8300  
Facsimile: (775) 882-0257  
[JWoodbury@kcnvlaw.com](mailto:JWoodbury@kcnvlaw.com)  
***Attorneys for Reza Zandian***

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

2311

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that service of the foregoing  
3 **OPPOSITION TO MOTION FOR WRIT OF EXECUTION** was made this date by  
4 depositing a true copy of the same for mailing at Carson City, Nevada, 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 21<sup>st</sup> day of April, 2014.

12   
13 \_\_\_\_\_  
14 an employee of Kaempfer Crowell  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

2312

ORIGINAL

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  
5

REC'D & FILED

2014 APR 21 PM 4:16

ALAN GLOVER  
BY  CLERK  
DEPUTY

6  
7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**  
9

10  
11 JED MARGOLIN, an individual,  
12 Plaintiff,

Case No.: 090C00579 1B

Dept. No.: 1

13 vs.

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

**REPLY IN SUPPORT OF MOTION  
FOR WRIT OF EXECUTION AND  
OPPOSITION TO MOTION TO  
RETAX AND SETTLE COSTS**

21 Defendants.  
22

23 Plaintiff Jed Margolin, by and through his attorneys of record, hereby files the  
24 following Reply in Support of Motion for Writ of Execution, filed April 2, 2014, and  
25 Opposition to Reza Zandian's ("Zandian") Motion to Retax and Settle Costs, filed on April 9,  
26 2014. Plaintiff hereby withdraws his Motion for Writ of Execution, and will be filing a  
27 Motion for Order Allowing Costs and Necessary Disbursements, shortly. Once the Motion for  
28 Order Allowing Costs and Necessary Disbursements is ruled upon, Plaintiff will renew the  
Motion for Writ of Execution.

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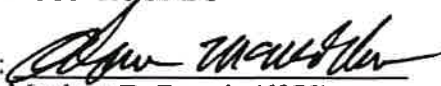
Plaintiff's withdrawal of the Motion for Writ of Execution is done without prejudice.  
Plaintiff does not admit any of the points made in Zandian's Motion to Retax and Settle Costs.  
Plaintiff's withdrawal of the Motion for Writ of Execution moots Zandian's Motion to Retax  
and Settle Costs.

**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: April 21, 2014.

WATSON ROUNDS

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*

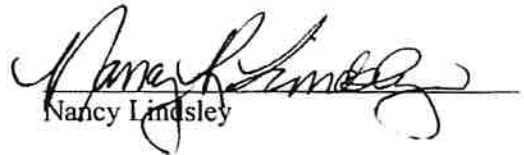
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**CERTIFICATE OF SERVICE**

Pursuant to NRCPC 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 WRIT OF EXECUTION AND OPPOSITION TO MOTION TO RETAX AND SETTLE COSTS**, addressed as follows:

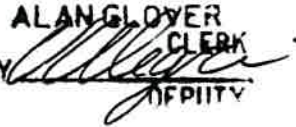
Jason D. Woodbury  
Severin A. Carlson  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, Nevada 89703  
*Attorneys for Defendant, Reza Zandian*

Dated: April 21, 2014

  
Nancy Lindsley

ORIGINAL

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 APR 28 PM 3:57  
ALAN GLOYER  
CLERK  
BY  OFFICE

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

10  
11 JED MARGOLIN, an individual,

12 Plaintiff,

13 vs.

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

21 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**MOTION FOR ORDER ALLOWING  
COSTS AND NECESSARY  
DISBURSEMENTS AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT  
THEREOF**

22 Plaintiff Jed Margolin has incurred various postjudgment collection costs and fees.

23 Pursuant to the judgment, NRS 18.160, NRS 18.170, and NRS 598.0999(2), Plaintiff moves  
24 this Court for an order awarding him postjudgment interest, costs and attorneys' fees.  
25

26 ///

27 ///

28 ///



POINTS AND AUTHORITIES

**I. Postjudgment Interest**

On June 24, 2013, the Court entered Default Judgment against Defendants. Notice of entry of the Default Judgment was filed on June 27, 2014. In the Default Judgment, the Court entered judgment in favor of Plaintiff against Defendants, jointly and severally, in the sum of \$1,495,775.74, plus interest at the legal rate, pursuant to NRS 17.130, thereon, from the date of default until the judgment is satisfied.

The award of interest in this case is governed by NRS 17.130(2), which states that the postjudgment interest computation in a proceeding to enforce a judgment is subject to either the parties' contract, the judgment against the party, or as otherwise provided by law. Accordingly, the interest computation in this case is governed by the judgment against Defendants. Because the original judgment was entered in Nevada and the judgment set the interest rate at the legal rate of interest according to NRS 17.130, the interest rate is 5.25 percent per-annum, or \$215.15 per-day. Further, because Plaintiff is enforcing the Nevada judgment according to its terms, which does not provide for compound interest, simple interest is appropriate. Accordingly, Plaintiff is owed simple interest at 5.25 percent or \$215.15 per-day from June 27, 2014, the date of notice of entry of the judgment, through April 18, 2014. It is 296 days from June 27, 2013 to April 18, 2014. Multiplying 296 days by \$215.15 equals \$63,684.40 in accrued interest.

**II. Postjudgment Costs**

NRS 18.160(1)(f) allows “[c]osts or disbursements incurred in connection with any proceeding supplementary to execution which have been approved as to necessity, propriety and amount by the judge ordering or conducting the proceeding.” (emphasis added). NRS 18.170 further provides that a “judgment creditor claiming costs or necessary disbursements reasonably in aid of collection of a judgment or of any execution issued thereon...” must file a

1 motion for costs and necessary disbursements “at any time or times not more than 6 months  
2 after such item has been incurred.” “The court or judge hearing such motion shall make such  
3 order respecting the costs or disbursements so claimed as the circumstances justify, allowing  
4 the same in whole or in part, or disallowing the same.” NRS 18.170.

5 Plaintiff has incurred the following costs or disbursements reasonably in aid of  
6 execution of the judgment in the last six months:

7 COSTS (October 18, 2013 THROUGH April 18, 2014):

8

|                                    |                   |
|------------------------------------|-------------------|
| 9 • Postage/photocopies (in-house) | \$ 481.20         |
| • Research                         | 285.31            |
| 10 • Witness Fees (Subpoenas)      | 215.66            |
| • Process service/courier fees     | <u>373.00</u>     |
|                                    | <u>\$1,355.17</u> |

11

12 The above items are correct and reasonable and the disbursements reasonably and  
13 necessarily incurred, postjudgment. See Declaration of Adam McMillen (“McMillen Decl.”),  
14 dated April 24, 2014, ¶¶ 11-13 and Exhibits 4-5.

15 **III. Postjudgment Attorney’s Fees**

16 “The district court may award attorney fees only if authorized by a rule, contract, or  
17 statute.” *Barney v. Mt. Rose Heating & Air Conditioning*, 124 Nev. 821, 825, 192 P.3d 730,  
18 733 (2008) (citing *Albios v. Horizon Communities, Inc.*, 122 Nev. 409, 417, 132 P.3d 1022,  
19 1028 (2006)). A district court’s award of attorney fees and costs is reviewed for an abuse of  
20 discretion. *Albios*, 122 Nev. at 417, 132 P.3d at 1027–28 (attorney fees); *Bobby Berosini, Ltd.*  
21 *v. PETA*, 114 Nev. 1348, 1352, 971 P.2d 383, 385 (1998) (costs).  
22

23 Under Plaintiff’s Deceptive Trade Practices claim, “[t]he court in any such action may,  
24 in addition to any other relief or reimbursement, award reasonable attorney’s fees and  
25 costs.” NRS 598.0999(2) (emphasis added). Although NRS 598.0999(2) does not explicitly  
26 provide for attorney fees incurred postjudgment, the statute does not expressly exclude  
27 postjudgment attorney fees from its purview, and for public policy reasons, NRS 598.0999(2)  
28

1 should be liberally interpreted as allowing for postjudgment attorney fees so as to further the  
2 statute's purpose to ensure that those that engage in deceptive trade practices are penalized and  
3 deterred from engaging in such practices and so that an attorney fee award properly includes  
4 the reasonable fees incurred in seeking the fees. *See Barney*, 124 Nev. at 825-26, 192 P.3d at  
5 733-34 (mechanic lien statute did not expressly provide for attorney fees incurred  
6 postjudgment, however, statute did not expressly exclude postjudgment attorney fees from its  
7 purview and was liberally interpreted to allow postjudgment attorney fees "so as to further the  
8 lien statutes' purpose to ensure that contractors are paid in whole for their work."); *see also*  
9 *Rosen v. LegacyQuest*, A136985, 2014 WL 1372114 (Cal. Ct. App. Mar. 21, 2014) (judgment  
10 creditor, who had recovered statutory attorney fees in connection with underlying judgment,  
11 authorized to recover attorney fees incurred in enforcing underlying judgment under the statute  
12 authorizing recovery of judgment creditor's "reasonable and necessary costs of enforcing a  
13 judgment," since the statute authorizing the underlying attorney fee award established that the  
14 fee award was "otherwise provided by law" within meaning of the fee statute) (an attorney fee  
15 award properly includes the reasonable fees incurred in seeking the fees); *see also Ketchum v.*  
16 *Moses* (2001) 24 Cal.4th 1122, 104 Cal.Rptr.2d 377, 17 P.3d 735 (judgment creditor entitled  
17 to fees incurred in enforcing the right to mandatory fees under statute).  
18  
19

20 "In Nevada, 'the method upon which a reasonable fee is determined is subject to the  
21 discretion of the court,' which 'is tempered only by reason and fairness.'" *Shuette v. Beazer*  
22 *Homes Holdings Corp.*, 124 P. 3d 530, 121 Nev. 837 (2005) (citing *University of Nevada v.*  
23 *Tarkanian*, 110 Nev. 581, 594, 591, 879 P.2d 1180, 1188, 1186 (1994)). "Accordingly, in  
24 determining the amount of fees to award, the court is not limited to one specific approach; its  
25 analysis may begin with any method rationally designed to calculate a reasonable amount,  
26 including those based on a 'lodestar' amount or a contingency fee." *Id.* (citations omitted).  
27 "The lodestar approach involves multiplying 'the number of hours reasonably spent on the  
28

1 case by a reasonable hourly rate.” *Id.* at n. 98 (citing *Herbst v. Humana Health Ins. of*  
2 *Nevada*, 105 Nev. 586, 590, 781 P.2d 762, 764 (1989)).

3 However, before awarding attorney’s fees, the district court must make findings  
4 concerning the reasonableness of the award, as required by *Brunzell v. Golden Gate National*  
5 *Bank*, 455 P.2d 31, 85 Nev. 345 (1969) and *Shuette v. Beazer Homes Holdings Corp.*, 124 P.  
6 3d 530, 121 Nev. 837 (2005). *See Barney*, 124 Nev. at 829-30, 192 P.3d at 735-37.

7 According to *Brunzell*, the factors that the district court should consider in awarding  
8 attorney fees, with no one factor controlling, is as follows:  
9

- 10 (1) the advocate's qualities, including ability, training, education, experience,  
professional standing, and skill;
- 11 (2) the character of the work, including its difficulty, intricacy, importance, as  
well as the time and skill required, the responsibility imposed, and the  
12 prominence and character of the parties when affecting the importance of the  
litigation;
- 13 (3) the work performed, including the skill, time, and attention given to the  
work; and
- 14 (4) the result—whether the attorney was successful and what benefits were  
15 derived.

16 *Barney*, 192 P.3d at 736 (citing *Brunzell*, 85 Nev. at 349, 455 P.2d at 33).

17 According to *Shuette*, the district court is required to “provide[ ] sufficient reasoning  
18 and findings in support of its ultimate determination.” *Id.* (citing *Shuette*, 121 Nev. at 865, 124  
19 P.3d at 549).

20 As set forth in Plaintiff’s counsel’s declaration, the lodestar amount of postjudgment  
21 attorney’s fees is \$34,632.50. *See* McMillen Decl., ¶¶ 2-6A and Exhibit 2. This amount only  
22 includes reasonable attorney’s fees from October 18, 2013 to April 18, 2014, as follows: 14.4  
23 hours of work performed by attorney Matthew D. Francis at \$300 per-hour (\$4,320.00); 81.5  
24 hours of work performed by attorney Adam P. McMillen at \$300 per-hour (\$24,450.00); and  
25 46.9 hours of work performed by paralegal Nancy Lindsley at \$125 per-hour (\$5,862.50). *Id.*  
26 This lodestar amount is reasonable under the Brunzell factors as follows.  
27

28 ///

1           **(1) Factors 1 and 2 - The Advocate's Qualities, Including Ability, Training,**  
2           **Education, Experience, Professional Standing, and Skill and The Novelty**  
3           **and Difficulty of The Questions Involved, and The Time and Skill Involved**

4           The issues related to this case included: (a) whether Plaintiff's patents were entitled to  
5 protection; (b) whether Defendants fraudulently assigned Plaintiff's patents; and (c), whether  
6 Plaintiff was damaged by Defendants' conduct. McMillen Decl., ¶ 7. The patent and  
7 deceptive trade practices issues, and the unique facts surrounding them, involved careful  
8 consideration and research. *Id.* In general, patent and deceptive trade practices litigation is a  
9 niche practice that requires a high degree of legal skill and care in order to be performed  
10 properly and effectively. *Id.* Each of these causes of action, coupled with the unique facts of  
11 this matter, required thorough research and careful analysis. *Id.*

12           In addition, the postjudgment collection efforts so far have included attempting to find  
13 Zandian's collectible assets, including researching and investigating his property in Nevada  
14 and California and moving for a debtor's examination. *Id.* Considering Zandian's elusive  
15 behavior to date and elaborate financial arrangements with a multitude of companies and  
16 individuals, Plaintiff has been forced to incur a significant amount of attorney's fees in  
17 attempting to collect on the judgment. *Id.*

18           Accordingly, Plaintiff's claimed postjudgment attorney's fees are reasonable under  
19 these factors.  
20

21           **(2) Factor 3 – The Time and Labor Required**

22           Plaintiff's counsel has been required to research Zandian's vast real estate holdings in  
23 Nevada. McMillen Decl., ¶ 9. Plaintiff's counsel has recorded the judgment in each Nevada  
24 County where Zandian holds property. *Id.* Plaintiff's counsel has researched and subpoenaed  
25 Zandian's financial information from several financial institutions. *Id.* Plaintiff's counsel has  
26 moved the court for a debtor's examination of Zandian. *Id.* The time and labor required  
27 relating to collections efforts are set forth in detail in Plaintiffs' counsel's declaration, and  
28

1 incorporated by reference herein. McMillen Decl., ¶¶ 5-10 and Exhibits 2-3. In sum, the time  
2 expended for the work product in this case is more than reasonable.

3 **(3) Factor 4 - The Result—Whether The Attorney Was Successful And What**  
4 **Benefits Were Derived**

5 Plaintiff prevailed on all of his causes of action in this case. Plaintiff's case against  
6 Defendants resulted in a Default Judgment being entered against Defendants on Plaintiff's  
7 causes of action. Specifically, the Court ordered Defendants to pay Plaintiff \$1,495,775.74,  
8 plus interest. In addition, through postjudgment efforts, Plaintiff's counsel has successfully  
9 liened Zandian's Nevada real estate to secure the judgment and Plaintiff's counsel is in the  
10 process of securing appropriate writs of execution to satisfy the judgment. Thus, Plaintiff  
11 obtained the results sought, and this factor weighs in favor of the reasonableness of Plaintiff's  
12 fee request.

13  
14 In sum, an analysis of the *Brunzell* factors and other applicable case law proves  
15 Plaintiff's fees in the lodestar amount of \$34,632.50 are reasonable and should be awarded.

16 **IV. Conclusion**

17 For the reasons stated above, Plaintiff respectfully requests that this Motion for Order  
18 Allowing Costs and Necessary Disbursements be granted in full.

19  
20 **AFFIRMATION PURSUANT TO NRS 239B.030**

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

23 DATED: April 25, 2014.

WATSON ROUNDS

24 By: Adam McMillen  
25 Matthew D. Francis (6978)  
26 Adam P. McMillen (10678)  
27 WATSON ROUNDS  
28 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, **MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF**, 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: April 25, 2014

  
Nancy Lindsley

ORIGINAL

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*

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7 In The First Judicial District Court of the State of Nevada  
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11 JED MARGOLIN, an individual,  
12 Plaintiff,

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

13 vs.

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

**DECLARATION OF ADAM  
MCMILLEN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ORDER  
ALLOWING COSTS AND  
NECESSARY DISBURSEMENTS**

21 Defendants.  
22

23 I, Adam P. McMillen, do hereby declare and state:

24 1. I am counsel of record for Plaintiff Jed Margolin in this matter. This declaration is  
25 based upon my personal knowledge and is made in support of Plaintiff's Motion for Order  
26 Allowing Costs and Necessary Disbursements.  
27  
28



1           2. I am an associate in the law firm of Watson Rounds. I have over 7 years of  
2 experience as a litigator in intellectual property and business litigation matters. Watson  
3 Rounds is an AV-rated law firm.

4           3. Matthew D. Francis is a partner in the law firm of Watson Rounds. He has over 14  
5 years of experience in the fields of intellectual property and business litigation, including  
6 reported decisions.

7           4. Between October 18, 2013 and April 18, 2014, my and Mr. Francis's hourly billing  
8 rate for this litigation was \$300 per-hour. It is my understanding that the customary fee  
9 charged by attorneys with our experience for similar patent and deceptive trade practices  
10 matters in Nevada ranges between \$275-\$450 per-hour. It is also my understanding that  
11 intellectual property litigators in major markets, such as San Francisco, Los Angeles, New  
12 York, and Boston charge in excess of these amounts, and in some instances, over \$500 per-  
13 hour. According to the 2002 Altman Weil "Survey of Law Firm Economics," the median  
14 partner hourly rates for intellectual property litigation exceeded well over \$300 per-hour in  
15 2002. A true and correct copy of the 2002 Altman Weil Survey entitled "Mining the Surveys:  
16 Which Specialties Command the Highest Rates," is attached hereto as Exhibit 1. This Survey  
17 was conducted over a decade ago. Furthermore, in 2012, the Ninth Circuit upheld a District of  
18 Nevada fee award in a trade dress action in the amount of \$836,899.99, and approved  
19 attorneys' fees ranging between \$320 to \$685 per hour. *See Secalt S.A. v. Wuxi Shenxi Const.*  
20 *Machinery Co., Ltd.*, 668 F.3d 677, 689 (9th Cir. 2012).

21           4A. Nancy Lindsley, my current secretary and paralegal, has over 30 years of  
22 paralegal experience and has worked almost exclusively on intellectual property matters  
23 during her tenure at Watson Rounds. Mrs. Lindsley's hourly rate for this action is \$125 per-  
24 hour.

25           5. The itemization and description of the work performed for the fees sought herein is  
26 set forth in a true and correct copy of Plaintiff's client ledger dated April 23, 2014, and  
27 attached hereto as Exhibit 2. Attached collectively hereto as Exhibit 3 are true and correct  
28 redacted copies of the actual invoices sent to Plaintiff, which list all activity performed on the

1 file, including fees and costs. Each of the bills set forth in Exhibit 3 was reviewed and edited,  
2 and is reasonable.

3 6. The personal abbreviations contained in Exhibits 2 and 3 mean the following: MDF  
4 = Matthew D. Francis; NRL = Nancy R. Lindsley; APM = Adam P. McMillen. Attorneys and  
5 paralegals at Watson Rounds bill in 1/10 of an hour increments.

6 6A. It is part of my ordinary business practice to review each invoice before it is sent  
7 to a client. All of the invoices sent to Plaintiff were personally reviewed by me or by Mr.  
8 Francis prior to being sent to Plaintiff for payment. As detailed below, Plaintiff requests  
9 reasonable attorneys' fees for this action in the amount of \$34,632.50. This amount only  
10 includes attorney's fees from October 18, 2013 to April 18, 2014, as follows: 14.4 hours of  
11 work performed by attorney Matthew D. Francis at \$300 per hour (\$4,320.00); 81.5 hours of  
12 work performed by attorney Adam P. McMillen at \$300 per hour (\$24,450.00); and 46.90  
13 hours of work performed by paralegal Nancy Lindsley at \$125 per hour (\$5,862.50).  
14 \$34,632.50 is the lodestar amount Plaintiff is requesting from the Court. *See* Exhibit 2.

15 7. This was a fraudulent patent assignment and deceptive trade practices action. The  
16 issues related to this case included: (a) whether Plaintiff's patents were entitled to protection;  
17 (b) whether Defendants fraudulently assigned Plaintiff's patents; and (c) whether Plaintiff was  
18 damaged by Defendants' conduct. The patent and deceptive trade practices issues, and the  
19 unique facts surrounding them, involved careful consideration and research. In general, patent  
20 and deceptive trade practices litigation is a niche practice that requires a high degree of legal  
21 skill and care in order to be performed properly and effectively. Each of these causes of  
22 action, coupled with the unique facts of this matter, required thorough research and careful  
23 analysis. In addition, the postjudgment collection efforts so far have included attempting to  
24 find Zandian's collectible assets, including researching and investigating his property in  
25 Nevada and California and moving for a debtor's examination. Considering Zandian's elusive  
26 behavior to date and elaborate financial arrangements with a multitude of companies and  
27 individuals, Plaintiff has been forced to incur a significant amount of attorney's fees in  
28 attempting to collect on the judgment.

1           8. On June 24, 2013, the Court entered Default Judgment against Defendants. In the  
2 Default Judgment, the Court entered judgment in favor of Plaintiff against Defendants, jointly  
3 and severally, in the sum of \$1,495,775.74, plus interest at the legal rate, pursuant to NRS  
4 17.130, therein from the date of default until the judgment is satisfied.

5           9. In order to begin collecting on the judgment, our office has been required to do the  
6 following: research Zandian's vast real estate holdings in Nevada; record the judgment in  
7 each Nevada County where Zandian holds property; research and subpoena Zandian's  
8 financial information from several financial institutions; move the Court for a debtor's  
9 examination of Zandian; among other things. *See* Exhibits 2 and 3.

10          10. The total amount of postjudgment fees relating to the above-identified areas of  
11 work identified in paragraph 9 is \$34,632.50. Again, this is the lodestar amount that Plaintiff  
12 is claiming.

13          11. Plaintiff incurred a total of \$1,355.17 in postjudgment costs as a result of this  
14 action. More specifically, Plaintiff incurred the following costs:

15           COSTS (October 18, 2013 THROUGH April 18, 2014):

|   |                   |
|---|-------------------|
| 16           • Postage/photocopies (in-house) | \$ 481.20         |
| 17           • Research                       | 285.31            |
| 18           • Witness Fees (Subpoenas)       | 215.66            |
| 19           • Process service/courier fees   | <u>373.00</u>     |
|   | <u>\$1,355.17</u> |

20          *See* Exhibit 4, which is a true and correct copy of a client ledger for Plaintiff's postjudgment  
21 costs and disbursements; *see also* Exhibit 5, which is a true and correct copy of the invoices  
22 and receipts for the Plaintiff's postjudgment costs.

23          12. As mentioned above, Plaintiff's total requested postjudgment fees in this case are  
24 \$34,632.50. Plaintiff's total requested postjudgment costs in this case are \$1,355.17.

25          13. To the best of my knowledge and belief the above items are correct and  
26 reasonable, and they have been necessarily and reasonably incurred in this action or  
27 proceeding.  
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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

**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: April 25, 2014

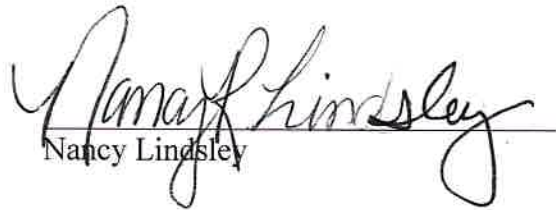
By:   
ADAM P. MCMILLEN

**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, **DECLARATION OF ADAM MCMILLEN IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS**, 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: April 5, 2014

  
Nancy Lindsley

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**EXHIBIT LIST**

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| <b>EXHIBIT NO.</b> | <b>DESCRIPTION</b>  | <b>PAGE(S)</b> |
|--------------------|---|----------------|
| 1                  | 2002 Altman Weil Survey entitled, "Mining the Surveys: Which Specialties Command the Highest Rates"                       | 4              |
| 2                  | Plaintiff's client ledger dated April 17, 2014, reflecting fees incurred between October 18, 2013 through April 18, 2014  | 8              |
| 3                  | Statements for professional services rendered to Plaintiff from October, 2013 through April, 2014                         | 39             |
| 4                  | Plaintiff's client ledger dated April 17, 2014, reflecting costs incurred between October 18, 2013 through April 18, 2014 | 3              |
| 5                  | Invoices and receipts for Plaintiff's postjudgment costs reflected on Exhibit 4   | 14             |

# Exhibit 1

Exhibit 1

## **MINING THE SURVEYS: WHICH SPECIALTIES COMMAND THE HIGHEST RATES?**

**by Ward Bower**

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The annual Altman Weil *Survey of Law Firm Economics* compiles billing rate information by geographic region, by state, by firm size, by size of population of the community in which the firm is located, by year admitted to the bar and by specialty, for both partners and associates. Specialty information is divided into litigation and non-litigation specialties.

### **Non-Litigation Specialties**

Twenty-seven non-litigation specialties are covered. The first chart (following) shows the top and bottom five non-litigation specialties, by median hourly billing rate for partners/ shareholders. The top median rate goes to partners and shareholders in intellectual property practice at \$345 per hour. The bottom goes to partner/ shareholders in Education specialty practice — \$200 per hour, less than 60% of the median rates of partners/ shareholders in intellectual property practice. On an 1,800 billable hour year, that would amount to a difference of \$261,000 in personal billings, annually.

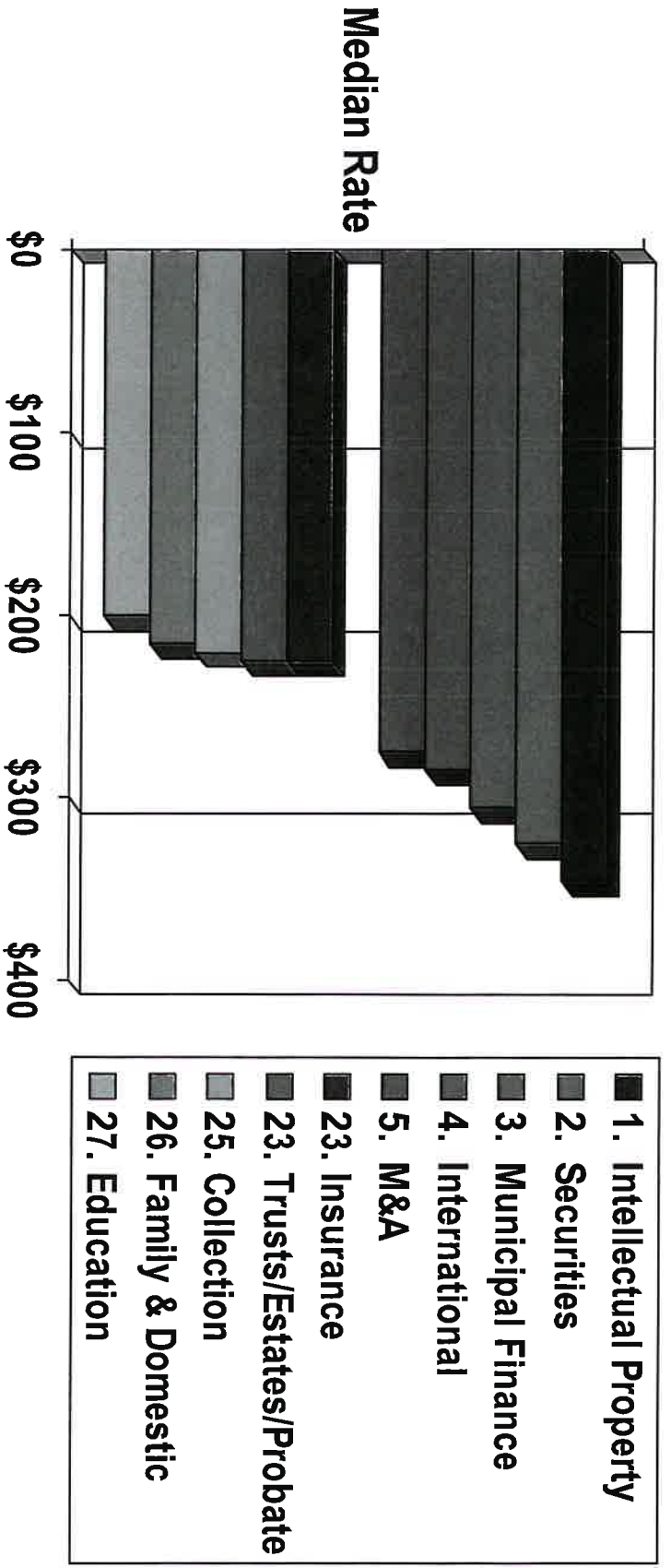
### **Litigation Specialties**

In the 26 litigation specialties reported in the 2002 Altman Weil Survey of Law Firm Economics, there is even a greater difference — \$296 per hour between the highest (antitrust — \$430) and lowest (workers' compensation — \$134). On a 1,800 hour work year, that difference would translate to a staggering \$532,800 differential in personal billings!

The second chart depicts the top and bottom five median partner/ shareholder hourly billing rates for litigation specialties reported in the 2002 Survey.

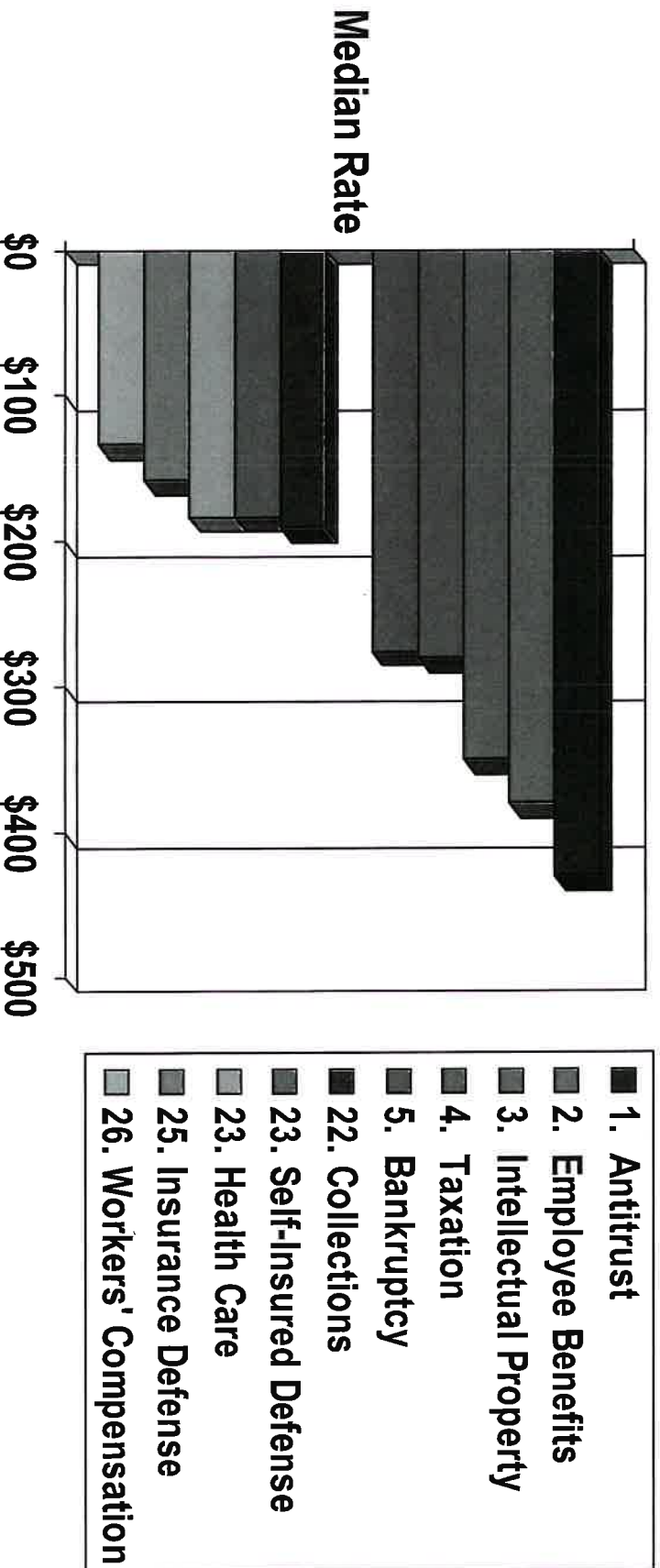


# Median Partner/ Shareholder Hourly Rates, by Specialty — Non-Litigation Areas (top five, bottom five)



Source: 2002 Altman Weil Survey of Law Firm Economics

# Median Partner/ Shareholder Hourly Rates, by Specialty — Litigation Areas (top five, bottom five)



Source: 2002 Altman Weil Survey of Law Firm Economics

# Exhibit 2

Exhibit 2

| Date        | Fee / Time  | Hours                    | Amount | Inv#         | Billing Status |
|-------------|---|--------------------------|--------|--------------|----------------|
| Entry #     | Explanation   |                          |        |              |                |
| 5457        | Margolin, Jed   |                          |        |              |                |
| 5457.01     | Patent theft analysis & litigation  |                          |        |              |                |
| Oct 18/2013 | Lawyer: NRL 1.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.50   | 187.50 12409 | Billed         |
| 1115373     | Telephone conference with Charles Schwab re password to access CD; access CD-compile information; save to clien |                          |        |              |                |
| Oct 18/2013 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12409 | Billed         |
| 1115374     | Telephone conference with Wells Fargo regarding redactions in documents produced; preparation of Second Amended |                          |        |              |                |
| Oct 24/2013 | Lawyer: NRL 0.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.50   | 62.50 12409  | Billed         |
| 1115875     | Email to Jed  |                          |        |              |                |
| Oct 28/2013 | Lawyer: NRL 0.80 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.80   | 100.00 12409 | Billed         |
| 1116086     | Brief conference with Jed   |                          |        |              |                |
| Oct 28/2013 | Lawyer: NRL 0.20 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.20   | 25.00 12409  | Billed         |
| 1116091     | Review email from MDF   |                          |        |              |                |
| Oct 28/2013 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12409  | Billed         |
| 1116101     | Review letter, dated 10/7/13, from Charles Schwab regarding subpoenaed documents.                               |                          |        |              |                |
| Oct 29/2013 | Lawyer: NRL 0.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.50   | 62.50 12409  | Billed         |
| 1116297     | Telephone conference with Wells Fargo regarding subpoena duces tecum; review previous SDT and response to same; |                          |        |              |                |
| Oct 30/2013 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12409  | Billed         |
| 1116490     | Communicate with Fred Sadri   |                          |        |              |                |
| Oct 30/2013 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12409 | Billed         |
| 1116520     | Commence preparation of Analysis of Information from Financial Institutions                                     |                          |        |              |                |
| Nov 1/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12455  | Billed         |
| 1116933     | Received telephone call from Eli Abrishami  |                          |        |              |                |
| Nov 1/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12455  | Billed         |
| 1116934     | Draft email to Eli Abrishami  |                          |        |              |                |
| Nov 1/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12455  | Billed         |
| 1116935     | Review email, dated 11/1/13, from Eli Abrishami   |                          |        |              |                |
| Nov 4/2013  | Lawyer: APM 0.40 Hrs X 300.00   | APM - Adam P. McMillen   | 0.40   | 120.00 12455 | Billed         |
| 1117495     | Review 18 pages of detailed Notes by Jed Margolin, dated 10/27/13,  |                          |        |              |                |
| Nov 8/2013  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12455  | Billed         |
| 1118457     | Communicate with Fred Sadri   |                          |        |              |                |
| Nov 8/2013  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12455  | Billed         |
| 1118462     | Review new subpoena to Bank of America.   |                          |        |              |                |
| Nov 8/2013  | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12455 | Billed         |
| 1118480     | Telephone conference with Wells Fargo regarding subpoena; preparation of SDT to Bank of America                 |                          |        |              |                |
| Nov 13/2013 | Lawyer: NRL 0.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.50   | 62.50 12455  | Billed         |
| 1118849     | Finalize BofA SDT for service   |                          |        |              |                |
| Nov 20/2013 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12455  | Billed         |
| 1119932     | Communicate with representative from Bank of America regarding their request for additional information for Zan |                          |        |              |                |
| Dec 2/2013  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12501  | Billed         |
| 1121016     | Communicate with Fred Sadri   |                          |        |              |                |
| Dec 2/2013  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12501  | Billed         |
| 1121017     | Draft email to Jed Margolin   |                          |        |              |                |
| Dec 2/2013  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12501  | Billed         |
| 1121030     | Communicate with Nancy Lindsley   |                          |        |              |                |
| Dec 2/2013  | Lawyer: NRL 1.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.50   | 187.50 12501 | Billed         |
| 1121051     | Review subpoena responses   |                          |        |              |                |
| Dec 4/2013  | Lawyer: NRL 0.20 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.20   | 25.00 12501  | Billed         |
| 1121458     | Discuss SDT's with APM;   |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12501  | Billed         |
| 1121789     | Review letter, dated 12/6/13, from Geoffrey Hawkins regarding his representation of Zandian.                    |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12501  | Billed         |
| 1121790     | Draft email to Jed Margolin regarding   |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12501  | Billed         |
| 1121792     | Communicate with Jed Margolin   |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.40 Hrs X 300.00   | APM - Adam P. McMillen   | 0.40   | 120.00 12501 | Billed         |
| 1121793     | Communicate with Johnathan Fayegehi regarding   |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12501  | Billed         |
| 1121794     | Communicate with Matt Francis   |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12501  | Billed         |
| 1121795     | Draft email to Jed Margolin   |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12501  | Billed         |
| 1121796     | Review Third Amended Subpoena to Charles Schwab.  |                          |        |              |                |
| Dec 6/2013  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12501  | Billed         |
| 1121797     | Review Subpoena to E-Trade.   |                          |        |              |                |
| Dec 6/2013  | Lawyer: MDF 0.50 Hrs X 300.00   | MDF - Matthew D. Francis | 0.50   | 150.00 12501 | Billed         |
| 1123234     | Conference with APM   |                          |        |              |                |
| Dec 9/2013  | Lawyer: APM 0.40 Hrs X 300.00   | APM - Adam P. McMillen   | 0.40   | 120.00 12501 | Billed         |
| 1122027     | Review email, dated 12/8/13, from Jed Margolin  |                          |        |              |                |
| Dec 10/2013 | Lawyer: NRL 0.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.00   | 0.00 12501   | Billed         |
| 1122113     |   |                          |        |              |                |
| Dec 10/2013 | Lawyer: APM 2.70 Hrs X 300.00   | APM - Adam P. McMillen   | 2.70   | 810.00 12501 | Billed         |
| 1122191     | Draft motion for debtor's examination.  |                          |        |              |                |
| Dec 10/2013 | Lawyer: NRL 0.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.00   | 0.00 12501   | Billed         |
| 1122281     | Process for service two (2) Subpoenas Duces Tecum - ETrade and Charlres Schwab & Co., Inc.                      |                          |        |              |                |
| Dec 11/2013 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12501  | Billed         |
| 1122290     | Review email, dated 12/10/13, from Jed Margolin   |                          |        |              |                |
| Dec 11/2013 | Lawyer: APM 0.70 Hrs X 300.00   | APM - Adam P. McMillen   | 0.70   | 210.00 12501 | Billed         |
| 1122291     | Revise motion for debtor's examination  |                          |        |              |                |
| Dec 11/2013 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12501 | Billed         |
| 1122315     | Finalize Motion for Judgment Debtor's Examination; compile exhibits and prepare exhibit list; serve all parties |                          |        |              |                |
| Dec 13/2013 | Lawyer: MDF 0.30 Hrs X 300.00   | MDF - Matthew D. Francis | 0.30   | 90.00 12501  | Billed         |
| 1123393     | Review motion for debtor's examination  |                          |        |              |                |
| Dec 17/2013 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12501  | Billed         |

| Date        | Fee / Time   | Hours | Amount  | Inv#  | Billing Status |
|-------------|--|-------|---------|-------|----------------|
| Entry #     | Explanation  |       |         |       |                |
| Dec 17/2013 | 1123556 Review email, dated 12/17/13, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed         |
| Dec 17/2013 | 1123557 Review email, dated 12/17/13, from Donna Johnson [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12501 | Billed         |
| Dec 17/2013 | 1123558 Draft email to Jed Margolin [REDACTED]<br>Lawyer: APM 0.20 Hrs X 300.00  | 0.20  | 60.00   | 12501 | Billed         |
| Dec 17/2013 | 1123559 Draft email to Donna Johnson [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12501 | Billed         |
| Dec 18/2013 | 1123568 Review and respond to email, dated 12/17/13, from Donna Johnson [REDACTED]<br>Lawyer: NRL 1.50 Hrs X 125.00                                      | 1.50  | 187.50  | 12501 | Billed         |
| Dec 18/2013 | 1123752 Scan documents received from Wells Fargo and Bank of America<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed         |
| Dec 19/2013 | 1125569 Review and respond to email, dated 12/18/13, from Donna Johnson [REDACTED]<br>Lawyer: NRL 1.50 Hrs X 125.00                                      | 1.50  | 187.50  | 12501 | Billed         |
| Dec 19/2013 | 1123884 Continued scanning of financial documents; compare scanned to original for reference; burn to DVD/CD for client<br>Lawyer: APM 0.20 Hrs X 300.00 | 0.20  | 60.00   | 12501 | Billed         |
| Dec 19/2013 | 1123893 Communicate with Donna Johnson [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12501 | Billed         |
| Dec 19/2013 | 1123894 Review email, dated 12/19/13, from Donna Johnson [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12501 | Billed         |
| Dec 19/2013 | 1123895 Draft email to Jed Margolin [REDACTED]<br>Lawyer: APM 0.40 Hrs X 300.00  | 0.40  | 120.00  | 12501 | Billed         |
| Dec 30/2013 | 1124315 Review Zandian's motion to set aside default judgment, dated 12/19/13.<br>Lawyer: APM 0.60 Hrs X 300.00  | 0.60  | 180.00  | 12501 | Billed         |
| Dec 30/2013 | 1124392 Review Westlaw people map report of Zandian [REDACTED]<br>Lawyer: APM 0.90 Hrs X 300.00  | 0.90  | 270.00  | 12501 | Billed         |
| Dec 30/2013 | 1124393 Begin review of Wells Fargo documents.<br>Lawyer: APM 0.30 Hrs X 300.00  | 0.30  | 90.00   | 12501 | Billed         |
| Dec 31/2013 | 1124394 Begin review of Bank of America documents.<br>Lawyer: APM 1.10 Hrs X 300.00  | 1.10  | 330.00  | 12501 | Billed         |
| Dec 31/2013 | 1124477 Finish review of Zandian's motion to set aside.<br>Lawyer: APM 0.50 Hrs X 300.00   | 0.50  | 150.00  | 12501 | Billed         |
| Dec 31/2013 | 1124478 Finish review of Zandian's people map from Westlaw [REDACTED]<br>Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00   | 12501 | Billed         |
| Dec 31/2013 | 1124485 Review detailed email, dated 12/22/13, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12501 | Billed         |
| Dec 31/2013 | 1124486 Draft email to Jed Margolin [REDACTED]<br>Lawyer: NRL 1.00 Hrs X 125.00  | 1.00  | 125.00  | 12501 | Billed         |
| Jan 2/2014  | 1124499 Initial review records from Charles Schwab; scan to file<br>Lawyer: MDF 0.50 Hrs X 300.00  | 0.50  | 150.00  | 12547 | Billed         |
| Jan 3/2014  | 1124989 Review motion to stay proceedings<br>Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00  | 12547 | Billed         |
| Jan 6/2014  | 1125010 Review and respond to detailed email, dated 1/3/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.40 Hrs X 300.00                                | 0.40  | 120.00  | 12547 | Billed         |
| Jan 6/2014  | 1125168 Review email, dated 1/6/14, and attachments, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00                                       | 0.10  | 30.00   | 12547 | Billed         |
| Jan 8/2014  | 1125169 Draft email to Jed Margolin [REDACTED]<br>Lawyer: APM 3.60 Hrs X 300.00  | 3.60  | 1080.00 | 12547 | Billed         |
| Jan 9/2014  | 1125435 Draft opposition to motion to set aside.<br>Lawyer: NRL 2.00 Hrs X 125.00  | 2.00  | 250.00  | 12547 | Billed         |
| Jan 9/2014  | 1125661 Review/proof Opposition to Motion to Set Aside Judgment; compile exhibits; arrange for filing and delivery to c<br>Lawyer: APM 4.90 Hrs X 300.00 | 4.90  | 1470.00 | 12547 | Billed         |
| Jan 9/2014  | 1125668 Finish drafting opposition to motion to set aside default judgment.<br>Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00  | 12547 | Billed         |
| Jan 9/2014  | 1125669 Revise proposed order on motion for debtor's examination.<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12547 | Billed         |
| Jan 9/2014  | 1125679 Review email, dated 1/8/14, from Jed Margolin [REDACTED]<br>Lawyer: MDF 0.50 Hrs X 300.00  | 0.50  | 150.00  | 12547 | Billed         |
| Jan 13/2014 | 1125888 Review opposition to motion to set aside, [REDACTED]<br>Lawyer: APM 0.20 Hrs X 300.00  | 0.20  | 60.00   | 12547 | Billed         |
| Jan 14/2014 | 1126575 Communicate with Judge Russell's assistant regarding debtor's examination on 2/11/14 at 9:00 a.m.<br>Lawyer: APM 0.10 Hrs X 300.00               | 0.10  | 30.00   | 12547 | Billed         |
| Jan 14/2014 | 1126679 Communicate with Angela, Judge Russell's assistant, regarding debtor's examination.<br>Lawyer: APM 0.30 Hrs X 300.00                             | 0.30  | 90.00   | 12547 | Billed         |
| Jan 14/2014 | 1126680 Begin preparing for debtor's examination.<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12547 | Billed         |
| Jan 14/2014 | 1126692 Draft email to Jed Margolin [REDACTED]<br>Lawyer: NRL 0.50 Hrs X 125.00  | 0.50  | 62.50   | 12547 | Billed         |
| Jan 14/2014 | 1126704 Telephone conference with staff from opposing counsel requesting transmittal of Opposition to Motion to Set Asi<br>Lawyer: MDF 0.30 Hrs X 300.00 | 0.30  | 90.00   | 12547 | Billed         |
| Jan 16/2014 | 1127397 Conference with APM [REDACTED]<br>Lawyer: APM 2.50 Hrs X 300.00  | 2.50  | 750.00  | 12547 | Billed         |
| Jan 16/2014 | 1126936 Draft opposition to Zandian's motion to stay proceedings.<br>Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00   | 12547 | Billed         |
| Jan 16/2014 | 1126939 Review order granting motion for debtor examination, dated 1/13/14.<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12547 | Billed         |
| Jan 16/2014 | 1126941 Review notice of entry of order for debtor's examination.<br>Lawyer: NRL 1.50 Hrs X 125.00   | 1.50  | 187.50  | 12547 | Billed         |
| Jan 16/2014 | 1126950 Review Opposition to Motion for Stay to Enforce Judgment; and Order Granting Plaintiff's Motion for Debtor Exam<br>Lawyer: NRL 0.20 Hrs X 125.00 | 0.20  | 25.00   | 12547 | Billed         |
| Jan 16/2014 | 1126953 Preparation of memo of telephone conference with client<br>Lawyer: MDF 1.20 Hrs X 300.00   | 1.20  | 360.00  | 12547 | Billed         |
| Jan 16/2014 | 1127386 Review and revise opposition to motion to stay proceedings, [REDACTED] /Review order granting  |       |         |       |                |

| Date        | Fee / Time  | Hours                    | Amount | Inv#          | Billing Status |
|-------------|---|--------------------------|--------|---------------|----------------|
| Entry #     | Explanation   |                          |        |               |                |
| Jan 17/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12547   | Billed         |
| 1126979     | Communicate with Nancy Lindsley   |                          |        |               |                |
| Jan 17/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12547   | Billed         |
| 1126985     | Review memo from Nancy Lindsley, dated 1/17/14,   |                          |        |               |                |
| Jan 17/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12547  | Billed         |
| 1127035     | Review Wells Fargo documents in anticipation of preparation of SDT for deposit detail; telephone conference wit |                          |        |               |                |
| Jan 23/2014 | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12547   | Billed         |
| 1127509     | Continue drafting questions for debtor's examination of Zandian.  |                          |        |               |                |
| Jan 23/2014 | Lawyer: APM 0.90 Hrs X 300.00   | APM - Adam P. McMillen   | 0.90   | 270.00 12547  | Billed         |
| 1127516     | Review and respond to email, dated 1/23/14, from Jed Margolin   |                          |        |               |                |
| Jan 23/2014 | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12547   | Billed         |
| 1127519     | Research process of service on E*Trade as they have not responded to subpoena and they do not have any branches |                          |        |               |                |
| Jan 23/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12547   | Billed         |
| 1127524     | Begin review Zandian's reply in support of motion to set aside default, dated 1/21/14.                          |                          |        |               |                |
| Jan 23/2014 | Lawyer: MDF 0.50 Hrs X 300.00   | MDF - Matthew D. Francis | 0.50   | 150.00 12547  | Billed         |
| 1127628     | Review reply in support of motion to set aside default judgment and affidavit in support thereof/Review request |                          |        |               |                |
| Jan 28/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12547  | Billed         |
| 1127844     | Review Federal Express from E*Trade Financial; duplicate for client; save to file                               |                          |        |               |                |
| Jan 29/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12547  | Billed         |
| 1127944     | Preparation of email to client; preparation of letter to transmit E*Trade                                       |                          |        |               |                |
| Jan 31/2014 | Lawyer: MDF 0.30 Hrs X 300.00   | MDF - Matthew D. Francis | 0.30   | 90.00 12547   | Billed         |
| 1128477     | Draft and review e-mails to and from law clerk and client, et al. re: order denying motion to set aside         |                          |        |               |                |
| Jan 31/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12547   | Billed         |
| 1129051     | Review email, dated 1/31/14, from Samantha Valerius, judge's law clerk, regarding request for proposed order.   |                          |        |               |                |
| Feb 1/2014  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12624   | Billed         |
| 1129052     | Review and respond to email, dated 2/1/14, from Jed Margolin  |                          |        |               |                |
| Feb 3/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1128543     | Review voicemail from Fred Sadri  |                          |        |               |                |
| Feb 4/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1128895     | Begin drafting order denying motion to set aside.   |                          |        |               |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129034     | Review email, dated 2/5/14, from Jed Margolin   |                          |        |               |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129035     | Draft email to Jed Margolin   |                          |        |               |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129036     | Review another email from Jed Margolin  |                          |        |               |                |
| Feb 5/2014  | Lawyer: APM 3.70 Hrs X 300.00   | APM - Adam P. McMillen   | 3.70   | 1110.00 12624 | Billed         |
| 1129038     | Draft proposed order denying Zandian's motion to set aside the judgment.  |                          |        |               |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129048     | Draft email to Samantha Valerius regarding proposed order denying motion to set aside judgment.                 |                          |        |               |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129053     | Review Zandian's reply in support of motion for stay of proceedings to enforce the judgment, dated 1/29/14.     |                          |        |               |                |
| Feb 5/2014  | Lawyer: MDF 1.00 Hrs X 300.00   | MDF - Matthew D. Francis | 1.00   | 300.00 12624  | Billed         |
| 1129234     | Review and revise proposed order denying Defendants' Motion to Set aside/Conferences with APM re: same          |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129184     | Review email, dated 2/6/14, from Samantha Valerius, judge's law clerk, regarding judge signing order denying mo |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129185     | Draft email to Samantha Valerius, judge's law clerk, regarding judge signing order denying motion to set aside  |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12624   | Billed         |
| 1129186     | Draft email to Jonathon Fayeghi regarding debtor's examination.   |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12624   | Billed         |
| 1129187     | Telephone conference with Fred Sadri  |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129195     | Review email, dated 2/6/14, from Johnathon Fayeghi regarding Zandian's debtor's examination.                    |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129196     | Draft email to Johnathon Fayeghi regarding Zandian's debtor's examination.                                      |                          |        |               |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129197     | Draft email to Jed Margolin   |                          |        |               |                |
| Feb 6/2014  | Lawyer: MDF 0.40 Hrs X 300.00   | MDF - Matthew D. Francis | 0.40   | 120.00 12624  | Billed         |
| 1129284     | Conference with APM   |                          |        |               |                |
| Feb 7/2014  | Lawyer: NRL 0.70 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.70   | 87.50 12624   | Billed         |
| 1129524     | Review Order Denying Motion to Set Aside Default Judgment; scan and transmit to opposing counsel; preparation o |                          |        |               |                |
| Feb 7/2014  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12624   | Billed         |
| 1129542     | Call and email John Fayeghi regarding Zandian's non-response to order to produce documents prior to debtor's ex |                          |        |               |                |
| Feb 7/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129551     | Draft email to Jed Margolin   |                          |        |               |                |
| Feb 7/2014  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12624   | Billed         |
| 1129554     | Review order denying Zandian's motion to set aside judgment, dated 2/6/14.                                      |                          |        |               |                |
| Feb 7/2014  | Lawyer: MDF 0.80 Hrs X 300.00   | MDF - Matthew D. Francis | 0.80   | 240.00 12624  | Billed         |
| 1130702     | Conference with APM   |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129743     | Draft another email to John Fayeghi regarding tomorrow's debtor's examination of Zandian.                       |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129744     | Draft debtor's examination questions.   |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12624   | Billed         |
| 1129746     | Review and respond to email, dated 2/10/14, from John Fayeghi regarding debtor's examination                    |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.80 Hrs X 300.00   | APM - Adam P. McMillen   | 0.80   | 240.00 12624  | Billed         |
| 1129748     | Draft email to Court regarding Zandian not appearing before the court tomorrow on debtor's examination.         |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12624   | Billed         |
| 1129756     | Review email, dated 2/10/14, from Angela Jeffries regarding vacating debtor's examination and requesting a moti |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1129757     | Draft email to Angela Jeffries regarding vacating debtor's examination and requesting a motion for order to sho |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |

| Date        | Fee / Time  | Hours                    | Amount | Inv#          | Billing Status |
|-------------|---|--------------------------|--------|---------------|----------------|
| Entry #     | Explanation   |                          |        |               |                |
| 1129758     | Draft email to Jed Margolin   |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12624   | Billed         |
| 1129759     | Review Wells Fargo's response to \$55,000 transaction to Zandian.   |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12624   | Billed         |
| 1129760     | Review email, dated 2/10/14, from Jed Margolin  |                          |        |               |                |
| Feb 10/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12624   | Billed         |
| 1129761     | Respond to Jed Margolin's email   |                          |        |               |                |
| Feb 10/2014 | Lawyer: MDF 1.00 Hrs X 300.00   | MDF - Matthew D. Francis | 1.00   | 300.00 12624  | Billed         |
| 1130645     | Conference with APM re:   |                          |        |               |                |
| Feb 11/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12624  | Billed         |
| 1130034     | Reorganize file materials; review emails between APM and opposing counsel and court                             |                          |        |               |                |
| Feb 11/2014 | Lawyer: APM 4.40 Hrs X 300.00   | APM - Adam P. McMillen   | 4.40   | 1320.00 12624 | Billed         |
| 1130053     | Draft Motion for Order to Show Cause Regarding Contempt, as requested by the court.                             |                          |        |               |                |
| Feb 11/2014 | Lawyer: MDF 1.30 Hrs X 300.00   | MDF - Matthew D. Francis | 1.30   | 390.00 12624  | Billed         |
| 1130138     | Review and revise motion to show cause why Defendant should not be held in contempt/                            |                          |        |               |                |
| Feb 12/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12624  | Billed         |
| 1130659     | Finalize Motion for Order to Show Cause Re Contempt vs. Zandian; compile exhibits; transmit for filing; serve v |                          |        |               |                |
| Feb 12/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1130680     | Finish drafting motion for contempt sanctions.  |                          |        |               |                |
| Feb 24/2014 | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12624   | Billed         |
| 1131791     | Review Zandian's substitution of attorney's, dated 2/21/14.   |                          |        |               |                |
| Feb 24/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1131793     | Draft email to Jed Margolin   |                          |        |               |                |
| Feb 24/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12624   | Billed         |
| 1131860     | Review and respond to Jed Margolin's email, dated 2/24/14,  |                          |        |               |                |
| Mar 4/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1132838     | Review voicemail, dated 3/4/14, from Fred Sadri   |                          |        |               |                |
| Mar 4/2014  | Lawyer: APM 0.70 Hrs X 300.00   | APM - Adam P. McMillen   | 0.70   | 210.00 12651  | Billed         |
| 1132839     | Review Opposition to Motion for Order to Show Cause Regarding Contempt, dated 3/3/14.                           |                          |        |               |                |
| Mar 4/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1132840     | Draft email to Jed Margolin   |                          |        |               |                |
| Mar 4/2014  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1132853     | Review and respond to email, dated 3/4/14, from Jed Margolin  |                          |        |               |                |
| Mar 4/2014  | Lawyer: MDF 0.80 Hrs X 300.00   | MDF - Matthew D. Francis | 0.80   | 240.00 12651  | Billed         |
| 1132931     | Review opposition to motion for order to show cause re: contempt/Draft and review e-mails to and from APM re: s |                          |        |               |                |
| Mar 4/2014  | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1134283     | Review email, dated 3/4/14, from Jed Margolin   |                          |        |               |                |
| Mar 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1133305     | Review voicemail from Fred Sadri  |                          |        |               |                |
| Mar 5/2014  | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12651   | Billed         |
| 1133306     | Telephone conference with Fred Sadri  |                          |        |               |                |
| Mar 5/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1134285     | Review email, dated 3/5/14, from Jed Margolin   |                          |        |               |                |
| Mar 5/2014  | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12651  | Billed         |
| 1136894     | Review Opposition to Motion for OSC; calendar reply to same; review Carson City County website to confirm if Za |                          |        |               |                |
| Mar 8/2014  | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1134292     | Review email, dated 3/8/14, from Jed Margolin   |                          |        |               |                |
| Mar 10/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1134284     | Review attachments attached to 3/4/14 email from Jed Margolin   |                          |        |               |                |
| Mar 11/2014 | Lawyer: APM 0.50 Hrs X 300.00   | APM - Adam P. McMillen   | 0.50   | 150.00 12651  | Billed         |
| 1134398     | Review Jed Margolin's comments  |                          |        |               |                |
| Mar 11/2014 | Lawyer: APM 3.90 Hrs X 300.00   | APM - Adam P. McMillen   | 3.90   | 1170.00 12651 | Billed         |
| 1134399     | Draft reply in support of motion for contempt sanctions.  |                          |        |               |                |
| Mar 12/2014 | Lawyer: APM 1.60 Hrs X 300.00   | APM - Adam P. McMillen   | 1.60   | 480.00 12651  | Billed         |
| 1134505     | Continue drafting reply in support of motion for contempt sanctions.  |                          |        |               |                |
| Mar 12/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1134512     | Review email, dated 3/12/14, from Jed Margolin  |                          |        |               |                |
| Mar 13/2014 | Lawyer: NRL 1.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.50   | 187.50 12651  | Billed         |
| 1134610     | Review and finalize Reply iso Motion for OSC; preparation of Request for Submission; telephone conference with  |                          |        |               |                |
| Mar 13/2014 | Lawyer: MDF 1.00 Hrs X 300.00   | MDF - Matthew D. Francis | 1.00   | 300.00 12651  | Billed         |
| 1134630     | Review and revise Reply ISO Motion for Order to Show Cause Regarding Contempt/Review appellate documents/Confer |                          |        |               |                |
| Mar 13/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1134671     | Finish drafting reply in support of motion for contempt sanctions.  |                          |        |               |                |
| Mar 13/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1134677     | Review notice of appeal.  |                          |        |               |                |
| Mar 13/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1134678     | Review case appeal statement.   |                          |        |               |                |
| Mar 13/2014 | Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen   | 0.10   | 30.00 12651   | Billed         |
| 1134679     | Review notice of cash deposit by Zandian.   |                          |        |               |                |
| Mar 13/2014 | Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen   | 0.30   | 90.00 12651   | Billed         |
| 1134680     | Perform legal research  |                          |        |               |                |
| Mar 14/2014 | Lawyer: NRL 0.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.50   | 62.50 12651   | Billed         |
| 1134747     | Download Appellate documents; change NV Supreme Court profile   |                          |        |               |                |
| Mar 17/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12651  | Billed         |
| 1134907     | Download file-stamped documents; calendar Nevada Supreme Court Appeal deadlines                                 |                          |        |               |                |
| Mar 18/2014 | Lawyer: NRL 0.50 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 0.50   | 62.50 12651   | Billed         |
| 1135027     | Download and save appeal documents  |                          |        |               |                |
| Mar 19/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | NRL - Nancy R. Lindsley  | 1.00   | 125.00 12651  | Billed         |
| 1135392     | Review Nevada Supreme Court docket; review Order Denying Request for Submission; and Notice of Assignment to Se |                          |        |               |                |
| Mar 19/2014 | Lawyer: MDF 0.50 Hrs X 300.00   | MDF - Matthew D. Francis | 0.50   | 150.00 12651  | Billed         |
| 1135437     | Review order rejecting request for submission relating to contempt application/Review Nevada Supreme Court sche |                          |        |               |                |
| Mar 19/2014 | Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen   | 0.20   | 60.00 12651   | Billed         |
| 1136412     | Review email, dated 3/19/14, from Jed Margolin  |                          |        |               |                |

Watson Rounds  
Client Fees Listing  
Oct/18/2013 To Apr/18/2014  
Working Lawyer

| Date        | Entry # | Fee / Time Explanation   | Hours | Amount | Inv#  | Billing Status |
|-------------|---------|--|-------|--------|-------|----------------|
| Mar 20/2014 | 1135506 | Lawyer: APM 0.40 Hrs X 300.00<br>Communicate with Matt Frances   | 0.40  | 120.00 | 12651 | Billed         |
| Mar 20/2014 | 1135507 | Lawyer: APM 0.90 Hrs X 300.00<br>Telephonc conference with Jed Margolin  | 0.90  | 270.00 | 12651 | Billed         |
| Mar 20/2014 | 1135512 | Lawyer: APM 0.40 Hrs X 300.00<br>Draft letter to Jason Woodbury requesting debtor's examination and documents from Zandian.                      | 0.40  | 120.00 | 12651 | Billed         |
| Mar 20/2014 | 1135530 | Lawyer: NRL 0.20 Hrs X 125.00<br>Finalize letter to Jason Woodbury; transmit via email and US Mail   | 0.20  | 25.00  | 12651 | Billed         |
| Mar 20/2014 | 1135900 | Lawyer: MDF 0.50 Hrs X 300.00<br>Conference with Adam Mcmillen re:   | 0.50  | 150.00 | 12651 | Billed         |
| Mar 20/2014 | 1136416 | Lawyer: APM 0.50 Hrs X 300.00<br>Review email, dated 3/20/14, from Jed Margolin  | 0.50  | 150.00 | 12651 | Billed         |
| Mar 22/2014 | 1136422 | Lawyer: APM 0.50 Hrs X 300.00<br>Review email, dated 3/21/14, from Jed Margolin regarding  | 0.50  | 150.00 | 12651 | Billed         |
| Mar 25/2014 | 1135892 | Lawyer: APM 0.20 Hrs X 300.00<br>Review and respond to email, dated 3/25/14, from Jed Margolin   | 0.20  | 60.00  | 12651 | Billed         |
| Mar 25/2014 | 1135983 | Lawyer: APM 0.40 Hrs X 300.00<br>Review and respond to email, dated 3/25/14, from Jed Margolin   | 0.40  | 120.00 | 12651 | Billed         |
| Mar 25/2014 | 1136737 | Lawyer: APM 0.40 Hrs X 300.00<br>Review email, dated 3/25/14, from Jed Margolin  | 0.40  | 120.00 | 12651 | Billed         |
| Mar 26/2014 | 1135890 | Lawyer: APM 0.30 Hrs X 300.00<br>Review email, dated 3/26/14, from Jed Margolin  | 0.30  | 90.00  | 12651 | Billed         |
| Mar 26/2014 | 1135891 | Lawyer: APM 0.50 Hrs X 300.00<br>Review email, dated 3/25/14, from Jed Margolin  | 0.50  | 150.00 | 12651 | Billed         |
| Mar 26/2014 | 1135893 | Lawyer: APM 0.30 Hrs X 300.00<br>Review email, dated 3/26/14, from Jed Margolin  | 0.30  | 90.00  | 12651 | Billed         |
| Mar 26/2014 | 1135894 | Lawyer: APM 0.60 Hrs X 300.00<br>Telephone call with Jed Margolin  | 0.60  | 180.00 | 12651 | Billed         |
| Mar 26/2014 | 1135954 | Lawyer: MDF 1.00 Hrs X 300.00<br>Review property title documents/Conference with APM re:   | 1.00  | 300.00 | 12651 | Billed         |
| Mar 27/2014 | 1135975 | Lawyer: NRL 2.00 Hrs X 125.00<br>Review notes and research regarding exeuction vs real property; review Jed's email and enclosures; commence pre | 2.00  | 250.00 | 12651 | Billed         |
| Mar 27/2014 | 1135990 | Lawyer: APM 0.20 Hrs X 300.00<br>Review filed copy of district court docket entries, filed with supreme court on 3/25/14.                        | 0.20  | 60.00  | 12651 | Billed         |
| Mar 28/2014 | 1136128 | Lawyer: NRL 2.50 Hrs X 125.00<br>Commence preparation of Motion for Writ of Execution, Writ of Execution and First Memorandum of Post-Judgment C | 2.50  | 312.50 | 12651 | Billed         |
| Mar 28/2014 | 1136134 | Lawyer: APM 0.20 Hrs X 300.00<br>Draft writ of execution.  | 0.20  | 60.00  | 12651 | Billed         |
| Mar 31/2014 | 1136403 | Lawyer: APM 0.10 Hrs X 300.00<br>Review and respond to email, dated 3/31/14, from Jed Margolin   | 0.10  | 30.00  | 12651 | Billed         |
| Mar 31/2014 | 1136404 | Lawyer: APM 0.10 Hrs X 300.00<br>Revise first memo of post-judgment costs and fees.  | 0.10  | 30.00  | 12651 | Billed         |
| Mar 31/2014 | 1136405 | Lawyer: APM 0.30 Hrs X 300.00<br>Revise writ of execution.   | 0.30  | 90.00  | 12651 | Billed         |
| Mar 31/2014 | 1136407 | Lawyer: APM 0.30 Hrs X 300.00<br>Review email, dated 3/28/14, from Jason Woodbury regarding Zandian's motion filed recently                      | 0.30  | 90.00  | 12651 | Billed         |
| Mar 31/2014 | 1136433 | Lawyer: APM 0.20 Hrs X 300.00<br>Communicate with Jed Margolin regarding   | 0.20  | 60.00  | 12651 | Billed         |
| Mar 31/2014 | 1136549 | Lawyer: NRL 2.00 Hrs X 125.00<br>Finalize First Memorandum of Costs; Motion for Issuance of Writ; recalculate interest; and preparation of of Af | 2.00  | 250.00 | 12651 | Billed         |
| Mar 31/2014 | 1136862 | Lawyer: APM 0.30 Hrs X 300.00<br>Review email, dated 4/1/14, from Jed Margolin   | 0.30  | 90.00  | 12651 | Billed         |
| Mar 31/2014 | 1136865 | Lawyer: APM 0.30 Hrs X 300.00<br>Review proposed motion for writ of execution.   | 0.30  | 90.00  | 12651 | Billed         |
| Mar 31/2014 | 1136870 | Lawyer: APM 0.10 Hrs X 300.00<br>Review voicemail from Fred Sadri and return his call.   | 0.10  | 30.00  | 12651 | Billed         |
| Mar 31/2014 | 1137007 | Lawyer: NRL 2.50 Hrs X 125.00<br>Finalize Motion for Writ of Execution; telephonc conference with Steve Wood of Washoe County Sheriff's Office r | 2.50  | 312.50 | 12651 | Billed         |
| Apr 1/2014  | 1137094 | Lawyer: NRL 1.00 Hrs X 125.00<br>Reveiw Clark County and Washoe County deeds for insertion of legal description into Writs of Execution; revise  | 1.00  | 125.00 |       | Unbilled       |
| Apr 1/2014  | 1137101 | Lawyer: NRL 0.50 Hrs X 125.00<br>Review emails; calendar response to Motion for Writ of Execution  | 0.50  | 62.50  |       | Unbilled       |
| Apr 2/2014  | 1137194 | Lawyer: APM 0.10 Hrs X 300.00<br>Review email, dated 4/2/14, from Jed Margolin   | 0.10  | 30.00  |       | Unbilled       |
| Apr 2/2014  | 1137195 | Lawyer: APM 1.20 Hrs X 300.00<br>Review Zandian's motion to dismiss and vacate default judgment.   | 1.20  | 360.00 |       | Unbilled       |
| Apr 2/2014  | 1137196 | Lawyer: APM 0.10 Hrs X 300.00<br>Draft email to Jason Woodbury regarding debtor's examination and bizarre motion filed by Zandian.               | 0.10  | 30.00  |       | Unbilled       |
| Apr 2/2014  | 1137197 | Lawyer: APM 0.60 Hrs X 300.00<br>Review file stamped motion to dismiss in Abrishami v Gold Canyon, dated 3/24/14.                                | 0.60  | 180.00 |       | Unbilled       |
| Apr 2/2014  | 1137199 | Lawyer: APM 0.30 Hrs X 300.00<br>Review file-stamped motion, dated 3/24/14.  | 0.30  | 90.00  |       | Unbilled       |
| Apr 2/2014  | 1137200 | Lawyer: APM 0.20 Hrs X 300.00<br>Telephone conference with Fred Sadri.   | 0.20  | 60.00  |       | Unbilled       |
| Apr 2/2014  | 1137201 | Lawyer: APM 0.20 Hrs X 300.00<br>Review letter, dated 12/4/13, from Kristin Luis to Judge Wilson regarding Gold Canyon case.                     | 0.20  | 60.00  |       | Unbilled       |
| Apr 2/2014  | 1137206 | Lawyer: APM 2.80 Hrs X 300.00<br>Review and respond to email, dated 4/2/14, from Jed Margolin  | 2.80  | 840.00 |       | Unbilled       |
| Apr 2/2014  | 1137210 | Lawyer: NRL 1.00 Hrs X 125.00<br>Draft confidential settlement brief.  | 1.00  | 125.00 |       | Unbilled       |
| Apr 2/2014  | 1137225 | Lawyer: MDF 1.00 Hrs X 300.00<br>Brief review Motion and supporting documents filed by Zandian; calendar response to same                        | 1.00  | 300.00 |       | Unbilled       |
| Apr 2/2014  |         | Lawyer: MDF 1.00 Hrs X 300.00<br>MDF - Matthew D. Francis  | 1.00  | 300.00 |       | Unbilled       |



| Date        | Fee / Time   | Hours                         | Amount | Inv# | Billing Status |
|-------------|--|-------------------------------|--------|------|----------------|
| Entry #     | Explanation  |                               |        |      |                |
| Apr 3/2014  | 1137244 Review Zandian's Motion to Dismiss and related documents/Review and revise Supreme Court mediation brief/Confer<br>Lawyer: NRL 1.00 Hrs X 125.00 | NRL - Nancy R. Lindsley 1.00  | 125.00 |      | Unbilled       |
| Apr 3/2014  | 1137587 Review/revise Respondent's Confidential Settlement Conference Statement; transmit via fax; telephone conference<br>Lawyer: NRL 0.50 Hrs X 125.00 | NRL - Nancy R. Lindsley 0.50  | 62.50  |      | Unbilled       |
| Apr 3/2014  | 1137589 Telephone conference with Reno Carson Messenger Service to arrange for personal delivery of Settlement Conferen<br>Lawyer: APM 0.60 Hrs X 300.00 | APM - Adam P. McMillen 0.60   | 180.00 |      | Unbilled       |
| Apr 4/2014  | 1137599 Finish drafting confidential settlement brief.<br>Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 4/2014  | 1138024 Review notification from Supreme Court of Zandian's filing of docketing statement<br>Lawyer: APM 0.50 Hrs X 300.00                               | APM - Adam P. McMillen 0.50   | 150.00 |      | Unbilled       |
| Apr 4/2014  | 1138025 Review Zandian's docketing statement<br>Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 7/2014  | 1138027 Review issued notice for Zandian to provide proof of service of docketing statement upon settlement judge.<br>Lawyer: APM 0.10 Hrs X 300.00      | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 7/2014  | 1138107 Review filed proof of service affidavit of service of docketing statement, dated 4/7/14<br>Lawyer: NRL 0.50 Hrs X 125.00                         | NRL - Nancy R. Lindsley 0.50  | 62.50  |      | Unbilled       |
| Apr 8/2014  | 1138125 Review and download filed Appellate documents<br>Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 8/2014  | 1138186 Review email, dated 4/8/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.50 Hrs X 300.00  | APM - Adam P. McMillen 0.50   | 150.00 |      | Unbilled       |
| Apr 8/2014  | 1138187 Review supreme court forms for responding to Zandian's docketing statement<br>Lawyer: APM 1.00 Hrs X 300.00                                      | APM - Adam P. McMillen 1.00   | 300.00 |      | Unbilled       |
| Apr 8/2014  | 1138191 Telephone call with Jed Margolin [REDACTED]<br>Lawyer: NRL 0.50 Hrs X 125.00   | NRL - Nancy R. Lindsley 0.50  | 62.50  |      | Unbilled       |
| Apr 8/2014  | 1138198 Telephone conference with Steve Wood of the Washoe County Sheriff's office re execution vs. real properties; le<br>Lawyer: APM 0.20 Hrs X 300.00 | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 9/2014  | 1138223 Review email, dated 4/8/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 9/2014  | 1138213 Draft opposition to Zandian's motion to dismiss<br>Lawyer: APM 0.30 Hrs X 300.00   | APM - Adam P. McMillen 0.30   | 90.00  |      | Unbilled       |
| Apr 9/2014  | 1138215 Review and respond to emails, dated 4/9/14, from Jason Woodbury regarding Zandian's motion to dismiss<br>Lawyer: APM 0.10 Hrs X 300.00           | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 9/2014  | 1138216 Draft email to Jed Margolin [REDACTED]<br>Lawyer: NRL 0.30 Hrs X 125.00  | NRL - Nancy R. Lindsley 0.30  | 37.50  |      | Unbilled       |
| Apr 9/2014  | 1138250 Telephone conference with Court Clerk re issuance of Writs; preparation of memo to APM re same<br>Lawyer: APM 0.20 Hrs X 300.00                  | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 10/2014 | 1138532 Review and respond to email from Nancy Lindsley [REDACTED]<br>Lawyer: NRL 0.50 Hrs X 125.00  | NRL - Nancy R. Lindsley 0.50  | 62.50  |      | Unbilled       |
| Apr 11/2014 | 1138333 Review Motion to Retax and Settle Costs; calendar response to same<br>Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 14/2014 | 1138506 Review and respond to email, dated 4/11/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen 0.30   | 90.00  |      | Unbilled       |
| Apr 14/2014 | 1138500 Meet with Matt Francis [REDACTED]<br>Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 14/2014 | 1138502 Review email, dated 4/14/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 14/2014 | 1138507 Draft email to Jason Woodbury regarding stipulation to withdraw motion to dismiss from Zandian<br>Lawyer: APM 0.10 Hrs X 300.00                  | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 14/2014 | 1138511 Review and respond to another email, dated 4/14/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.70 Hrs X 300.00                                | APM - Adam P. McMillen 0.70   | 210.00 |      | Unbilled       |
| Apr 14/2014 | 1138512 Revise declaration for JP Lee, gather old letters regarding same and draft email to JP Lee requesting him to si<br>Lawyer: APM 0.10 Hrs X 300.00 | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 14/2014 | 1138513 Review filed copy of District court Docket Entries, dated 4/10/14<br>Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 14/2014 | 1138521 Review email, dated 4/14/14, from Jason Woodbury regarding stipulation to withdraw Zandian's motion to dismiss<br>Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 14/2014 | 1138522 Review first draft of Jason Woodbury's proposed stipulation to withdraw Zandian's motion to dismiss<br>Lawyer: APM 0.20 Hrs X 300.00             | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 14/2014 | 1138523 Draft emails to Jason Woodbury regarding proposed stipulation to withdraw Zandian's motion to dismiss<br>Lawyer: NRL 0.50 Hrs X 125.00           | NRL - Nancy R. Lindsley 0.50  | 62.50  |      | Unbilled       |
| Apr 15/2014 | 1138547 Transmit executed Stipulation and Order to Withdraw Motion to Jason Woodbury<br>Lawyer: APM 0.20 Hrs X 300.00                                    | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 15/2014 | 1138697 Begin review of Zandian's motion to retax, dated 4/9/14<br>Lawyer: APM 0.10 Hrs X 300.00   | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 15/2014 | 1138698 Review email, dated 4/15/14, from Tiffany Dube regarding request for declaration from JP Lee<br>Lawyer: APM 0.10 Hrs X 300.00                    | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 15/2014 | 1138699 Review letter, dated 4/15/14, from JP Lee regarding request for declaration<br>Lawyer: MDF 0.50 Hrs X 300.00                                     | MDF - Matthew D. Francis 0.50 | 150.00 |      | Unbilled       |
| Apr 16/2014 | 1138834 Review motion to retax costs/Emails with APM re: same<br>Lawyer: NRL 0.80 Hrs X 125.00   | NRL - Nancy R. Lindsley 0.80  | 100.00 |      | Unbilled       |
| Apr 16/2014 | 1138801 Generate report reflecting costs incurred from 6/26/2013 to present; commence preparation of revised Memorandum<br>Lawyer: APM 1.40 Hrs X 300.00 | APM - Adam P. McMillen 1.40   | 420.00 |      | Unbilled       |
| Apr 16/2014 | 1138816 Finish review of Zandian's motion to retax<br>Lawyer: APM 1.70 Hrs X 300.00  | APM - Adam P. McMillen 1.70   | 510.00 |      | Unbilled       |
| Apr 16/2014 | 1138817 Begin drafting opposition to Zandian's motion to retax<br>Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen 0.30   | 90.00  |      | Unbilled       |
| Apr 16/2014 | 1138819 Review and respond to email, dated 4/15/14, from Jed Margolin [REDACTED]<br>Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen 0.30   | 90.00  |      | Unbilled       |
| Apr 16/2014 | 1138862 Meet with Matt Francis [REDACTED]<br>Lawyer: APM 0.20 Hrs X 300.00   | APM - Adam P. McMillen 0.20   | 60.00  |      | Unbilled       |
| Apr 16/2014 | 1138863 Draft email to Jed Margolin [REDACTED]<br>Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen 0.10   | 30.00  |      | Unbilled       |
| Apr 16/2014 | 1138864 Communicate with David Wasick regarding mediation  |                               |        |      |                |

| Date        | Entry # | Fee / Time Explanation  | Hours           | Amount  | Inv#     | Billing Status |
|-------------|---------|---|-----------------|---------|----------|----------------|
| Apr 16/2014 | 1138865 | Lawyer: APM 0.10 Hrs X 300.00<br>Draft email to Jed Margolin  | 0.10            | 30.00   |          | Unbilled       |
| Apr 16/2014 | 1138866 | Lawyer: APM 3.40 Hrs X 300.00<br>Draft motion for post judgment fees and costs  | 3.40            | 1020.00 |          | Unbilled       |
| Apr 16/2014 | 1138869 | Lawyer: APM 0.10 Hrs X 300.00<br>Review email, dated 4/17/14, from Jason Woodbury regarding settlement conference in May          | 0.10            | 30.00   |          | Unbilled       |
| Apr 17/2014 | 1138879 | Lawyer: APM 0.30 Hrs X 300.00<br>Review and respond to emails, dated 4/18/14, from Jed Margolin                                   | 0.30            | 90.00   |          | Unbilled       |
| Apr 17/2014 | 1139139 | Lawyer: MDF 0.50 Hrs X 300.00<br>Review emails re: settlement issues/Conference with APM re: same and Voicemail from David Wasick | 0.50            | 150.00  |          | Unbilled       |
| Apr 18/2014 | 1138926 | Lawyer: NRL 0.50 Hrs X 125.00<br>Generate reports from PCLaw for fees and costs from October 21, 2013 through April 21, 2014      | 0.50            | 62.50   |          | Unbilled       |
| Apr 18/2014 | 1138927 | Lawyer: NRL 1.00 Hrs X 125.00<br>Review/proof Motion for Order Allowing Costs and APM Dec iso same; compile exhibits              | 1.00            | 125.00  |          | Unbilled       |
| Apr 18/2014 | 1138934 | Lawyer: APM 0.20 Hrs X 300.00<br>Draft email to David Wasick and Woodbury regarding settlement conference                         | 0.20            | 60.00   |          | Unbilled       |
| Apr 18/2014 | 1138936 | Lawyer: APM 0.10 Hrs X 300.00<br>Review email, dated 4/18/14, from David Wasick setting settlement conference for May 21, 2014    | 0.10            | 30.00   |          | Unbilled       |
| Apr 18/2014 | 1138937 | Lawyer: APM 0.10 Hrs X 300.00<br>Draft email to Jed Margolin  | 0.10            | 30.00   |          | Unbilled       |
| Apr 18/2014 | 1138938 | Lawyer: APM 1.60 Hrs X 300.00<br>Finish drafting motion for postjudgment fees and costs   | 1.60            | 480.00  |          | Unbilled       |
| Apr 18/2014 | 1138940 | Lawyer: APM 0.10 Hrs X 300.00<br>Review Supreme Court of Nevada's notice of filed copy of district court docket entries           | 0.10            | 30.00   |          | Unbilled       |
| Apr 18/2014 | 1138944 | Lawyer: APM 0.10 Hrs X 300.00<br>Review and respond to email, dated 4/18/14, from Jed Margolin                                    | 0.10            | 30.00   |          | Unbilled       |
|             |         |   | Unbilled:       | 33.10   | 8425.00  |                |
|             |         |   | Billed:         | 109.70  | 26207.50 |                |
|             |         |   | Total:          | 142.80  | 34632.50 |                |
|             |         |   | Percent Billed: | 76.82   | 75.67    |                |

\*\*\* Summary by Working Lawyer \*\*\*

| Working Lawyer    | Hours        |               |               |               | Fees          |              |                |               |                 |               |                 |              |
|-------------------|--------------|---------------|---------------|---------------|---------------|--------------|----------------|---------------|-----------------|---------------|-----------------|--------------|
|                   | Unbilled     | Firm %        | Billed        | Firm %        | Total         | % Bld        | Unbilled       | Firm %        | Billed          | Firm %        | Total           | % Bld        |
| MDF - Matthew D.  | 2.00         | 6.04          | 12.40         | 11.30         | 14.40         | 86.11        | 600.00         | 7.12          | 3720.00         | 14.19         | 4320.00         | 86.11        |
| APM - Adam P. Mc  | 22.50        | 67.98         | 59.00         | 53.78         | 81.50         | 72.39        | 6750.00        | 80.12         | 17700.00        | 67.54         | 24450.00        | 72.39        |
| NRL - Nancy R. Li | 8.60         | 25.98         | 38.30         | 34.91         | 46.90         | 81.66        | 1075.00        | 12.76         | 4787.50         | 18.27         | 5862.50         | 81.66        |
| <b>Firm Total</b> | <b>33.10</b> | <b>100.00</b> | <b>109.70</b> | <b>100.00</b> | <b>142.80</b> | <b>76.82</b> | <b>8425.00</b> | <b>100.00</b> | <b>26207.50</b> | <b>100.00</b> | <b>34632.50</b> | <b>75.67</b> |

\*\*\* Summary by Responsible Lawyer \*\*\*

| Responsible Lawyer | Hours        |               |               |               | Fees          |              |                |               |                 |               |                 |              |
|--------------------|--------------|---------------|---------------|---------------|---------------|--------------|----------------|---------------|-----------------|---------------|-----------------|--------------|
|                    | Unbilled     | Firm %        | Billed        | Firm %        | Total         | % Bld        | Unbilled       | Firm %        | Billed          | Firm %        | Total           | % Bld        |
| APM - Adam P. Mc   | 33.10        | 100.00        | 109.70        | 100.00        | 142.80        | 76.82        | 8425.00        | 100.00        | 26207.50        | 100.00        | 34632.50        | 75.67        |
| <b>Firm Total</b>  | <b>33.10</b> | <b>100.00</b> | <b>109.70</b> | <b>100.00</b> | <b>142.80</b> | <b>76.82</b> | <b>8425.00</b> | <b>100.00</b> | <b>26207.50</b> | <b>100.00</b> | <b>34632.50</b> | <b>75.67</b> |

REPORT SELECTIONS - Client Fees Listing

Layout Template Default  
 Advanced Search Filter None  
 Requested by Nancy  
 Finished Thursday, April 24, 2014 at 01:39:37 PM  
 Ver 13.0 SP1 (13.0.20131028)  
 Date Range Oct/18/2013 To Apr/18/2014  
 Matters 5457.01  
 Clients All  
 Major Clients All  
 Client Intro Lawyer All  
 Matter Intro Lawyer All  
 Responsible Lawyer All  
 Assigned Lawyer All  
 Type of Law All  
 Select From Active, Inactive, Archived Matters  
 Matters Sort by Default  
 New Page for Each Lawyer No  
 Firm Totals Only No  
 Client balances only No  
 Matter balances only No  
 Entries Shown - Billed Only Yes  
 Entries Shown - Unbilled Yes  
 Entries Shown - Billable Tasks Yes  
 Entries Shown - Write Up/Down Tasks Yes  
 Entries Shown - No Charge Tasks Yes  
 Entries Shown - Non Billable Tasks Yes  
 Working Lawyer All

# Exhibit 3

Exhibit 3

**WATSON ROUNDS**

Tax ID#: 88-0319593

5371 Kietzke Lane  
Reno, NV 89511

Ph: 775-324-4100

Fax: 775-333-8171

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

November 7, 2013

Attention:

File #: 5457.01

Inv #: 124091

RE: Patent theft analysis & litigation

| DATE       | DESCRIPTION | HOURS      | AMOUNT     | LAWYER     |
|------------|-------------|------------|------------|------------|
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |
| [REDACTED] | [REDACTED]  | [REDACTED] | [REDACTED] | [REDACTED] |



preparation of email to client [REDACTED]  
[REDACTED]

Telephone conference with Wells Fargo regarding redactions in documents produced; preparation of Second Amended SDT to Wells Fargo; arrange for service; serve Defendants; duplicate CD from Charles Schwab for client; organize file containing subpoena responses. 1.00 125.00 NRL

Oct-24-13 Email to Jed [REDACTED] continued organization of documents received in response to subpoenas duces tecum 0.50 62.50 NRL

Oct-28-13 Review letter, dated 10/7/13, from Charles Schwab regarding subpoenaed documents. 0.10 30.00 APM

Brief conference with Jed [REDACTED]  
[REDACTED] 0.80 100.00 NRL

Review email from MDF [REDACTED] left message for Merriam at Wells Fargo re same 0.20 25.00 NRL

Oct-29-13 Telephone conference with Wells Fargo regarding subpoena duces tecum; review previous SDT and response to same; and request they review/research and respond to SDT. Granted extension of time to respond to same 0.50 62.50 NRL

Oct-30-13 Communicate with Fred Sadri [REDACTED]  
[REDACTED] 0.20 60.00 APM

Commence preparation of Analysis of Information from Financial Institutions 1.00 125.00 NRL

Totals 16.20 \$3,512.50

**DISBURSEMENTS**

**Disbursements**

**Receipts**

Nov-07-13 Payment for invoice: 124091 2,550.00

Invoice #: 124091

Page

Payment for invoice: 124091 194.20

Payment for invoice: 124091 962.50

|           |  |          |                   |
|-----------|--|----------|-------------------|
| Oct-07-13 | Research/DVD/USP from Charles Schwab             | 98.42    |                   |
| Oct-18-13 | Witness fee subpoena for Wells Fargo             | 25.00    |                   |
|           | Photocopies 54 @ 0.25 - Documents to Wells Fargo | 13.50    |                   |
|           | Postage  | 5.28     |                   |
| Oct-22-13 | Process service expense                          | 52.00    |                   |
|           | Totals   | \$194.20 | \$0.00            |
|           | <b>Total Current Fees &amp; Disbursements</b>    |          | <b>\$3,706.70</b> |
|           | Previous Balance                                 |          | \$0.00            |
|           | Payments   |          | \$0.00            |
|           | <b>Balance Due Now</b>                           |          | <b>\$0.00</b>     |
|           | Approved By: _____                               |          |                   |

Retainer Balance: \$0.00

**Client shall pay Attorney's invoices on a Net 30 basis. Attorney may charge interest for any late payment of any sum due under this Agreement at the rate of eighteen percent (18%) per annum from the due date of the invoice until the date paid.**

**TRUST STATEMENT**

| <b>5457.01</b> |   | <b>Disbursements</b> | <b>Receipts</b>   |
|----------------|---|----------------------|-------------------|
|                | Trust Balance Forward                                 |                      | 1,109.14          |
| Oct-30-13      | Received From: Jed Margolin<br>Trust receipt          |                      | 3,890.86          |
| Nov-07-13      | Paid To: Watson Rounds<br>Payment for invoice: 124091 | 3,706.70             |                   |
|                | Total Trust   | <u>\$3,706.70</u>    | <u>\$5,000.00</u> |
|                | <b>Trust Balance</b>                                  |                      | <b>\$1,293.30</b> |



**WATSON ROUNDS**

Tax ID#: 88-0319593

5371 Kietzke Lane  
Reno, NV 89511

Ph: 775-324-4100

Fax: 775-333-8171

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

December 9, 2013

Attention:

File #: 5457.01  
Inv #: 124555

RE: Patent theft analysis & litigation

| DATE      | DESCRIPTION   | HOURS | AMOUNT | LAWYER |
|-----------|---|-------|--------|--------|
| Nov-01-13 | Received telephone call from Eli Abrishami<br>[REDACTED]  | 0.10  | 30.00  | APM    |
|           | Draft email to Eli Abrishami [REDACTED]<br>[REDACTED]   | 0.10  | 30.00  | APM    |
|           | Review email, dated 11/1/13, from Eli<br>Abrishami [REDACTED]   | 0.10  | 30.00  | APM    |
| Nov-04-13 | Review 18 pages of detailed Notes by Jed<br>Margolin, dated 10/27/13, [REDACTED]<br>[REDACTED]        | 0.40  | 120.00 | APM    |
| Nov-08-13 | Communicate with Fred Sadri [REDACTED]<br>[REDACTED]  | 0.30  | 90.00  | APM    |
|           | Review new subpoena to Bank of America.   | 0.20  | 60.00  | APM    |
|           | Telephone conference with Wells Fargo<br>regarding subpoena; preparation of SDT to<br>Bank of America | 1.00  | 125.00 | NRL    |
| Nov-13-13 | Finalize BofA SDT for service   | 0.50  | 62.50  | NRL    |
| Nov-20-13 | Communicate with representative from Bank of<br>America regarding their request for                   | 0.10  | 30.00  | APM    |

additional information for Zandian related to our subpoena.

|  |      |          |
|--|------|----------|
|  | 2.80 | \$577.50 |
|--|------|----------|

**DISBURSEMENTS**

**Disbursements**

**Receipts**

|           |  |         |        |
|-----------|--|---------|--------|
| Dec-09-13 | Payment for invoice: 124555              |         | 390.00 |
|           | Payment for invoice: 124555              |         | 82.28  |
|           | Payment for invoice: 124555              |         | 187.50 |
| Nov-13-13 | Witness fee subpoena for Bank of America | 25.00   |        |
|           | Postage                                  | 5.28    |        |
| Nov-18-13 | Process service expense                  | 52.00   |        |
|           | Totals                                   | \$82.28 | \$0.00 |

**Total Current Fees & Disbursements**

**\$659.78**

Previous Balance

\$0.00

Payments

\$0.00

**Balance Due Now**

**\$0.00**

Approved By: \_\_\_\_\_

Retainer Balance: \$0.00

**Client shall pay Attorney's invoices on a Net 30 basis. Attorney may charge interest for any late payment of any sum due under this Agreement at the rate of eighteen percent (18%) per annum from the due date of the invoice until the date paid.**

**TRUST STATEMENT**

| <b>5457.01</b> |   | <b>Disbursements</b> | <b>Receipts</b>   |
|----------------|---|----------------------|-------------------|
|                | Trust Balance Forward                                 |                      | 1,293.30          |
| Nov-27-13      | Received From: Jed Margolin<br>Trust receipt          |                      | 3,706.70          |
| Dec-09-13      | Paid To: Watson Rounds<br>Payment for invoice: 124555 | 659.78               |                   |
|                | <b>Total Trust</b>                                    | <b>\$659.78</b>      | <b>\$5,000.00</b> |
|                | <b>Trust Balance</b>                                  |                      | <b>\$4,340.22</b> |

**WATSON ROUNDS**

Tax ID#: 88-0319593

5371 Kietzke Lane

Reno, NV 89511

Ph: 775-324-4100

Fax: 775-333-8171

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

January 13, 2014

Attention:

File #: 5457.01

Inv #: 125011

RE: Patent theft analysis & litigation

| DATE      | DESCRIPTION   | HOURS | AMOUNT | LAWYER |
|-----------|---|-------|--------|--------|
| Dec-02-13 | Communicate with Fred Sadri [REDACTED]<br>[REDACTED]  | 0.20  | 60.00  | APM    |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.20  | 60.00  | APM    |
|           | Communicate with Nancy Lindsley [REDACTED]<br>[REDACTED]  | 0.20  | 60.00  | APM    |
|           | Review subpoena responses and [REDACTED]<br>[REDACTED]; preparation of SDT to Etrade and revised<br>SDT to Charles Schwab | 1.50  | 187.50 | NRL    |
| Dec-04-13 | Discuss SDT's with APM;   | 0.20  | 25.00  | NRL    |
| Dec-06-13 | Conference with APM re: [REDACTED]<br>[REDACTED]  | 0.50  | 150.00 | MDF    |
|           | Review letter, dated 12/6/13, from Geoffrey<br>Hawkins regarding his representation of<br>Zandian.                        | 0.30  | 90.00  | APM    |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10  | 30.00  | APM    |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Communicate with Jed Margolin [REDACTED]<br>[REDACTED]  | 0.30 | 90.00  | APM |
|           | Communicate with Johnathan Fayeghi regarding threatened motion to set aside default judgment.                                 | 0.40 | 120.00 | APM |
|           | Communicate with Matt Francis [REDACTED]<br>[REDACTED]  | 0.30 | 90.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Review Third Amended Subpoena to Charles Schwab.  | 0.10 | 30.00  | APM |
|           | Review Subpoena to E-Trade.   | 0.10 | 30.00  | APM |
| Dec-09-13 | Review email, dated 12/8/13, from Jed Margolin [REDACTED].  | 0.40 | 120.00 | APM |
| Dec-10-13 | Draft motion for debtor's examination.  | 2.70 | 810.00 | APM |
|           |   | 0.00 | 0.00   | NRL |
|           | Process for service two (2) Subpoenas Duces Tecum - ETrade and Charlres Schwab & Co., Inc.                                    | 0.00 | 0.00   | NRL |
| Dec-11-13 | Review email, dated 12/10/13, from Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Revise motion for debtor's examination<br>[REDACTED]  | 0.70 | 210.00 | APM |
|           | Finalize Motion for Judgment Debtor's Examination; compile exhibits and prepare exhibit list; serve all parties via U.S. Mail | 1.00 | 125.00 | NRL |
| Dec-13-13 | Review motion for debtor's examination  | 0.30 | 90.00  | MDF |
| Dec-17-13 | Review email, dated 12/17/13, from Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Review email, dated 12/17/13, from Donna Johnson [REDACTED]<br>[REDACTED]   | 0.10 | 30.00  | APM |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Draft email to Donna Johnson [REDACTED]<br>[REDACTED]   | 0.20 | 60.00  | APM |
|           | Review and respond to email, dated 12/17/13,<br>from Donna Johnson [REDACTED]<br>[REDACTED]   | 0.10 | 30.00  | APM |
| Dec-18-13 | Review and respond to email, dated 12/18/13,<br>from Donna Johnson [REDACTED]<br>[REDACTED]   | 0.10 | 30.00  | APM |
|           | Scan documents received from Wells Fargo and<br>Bank of America   | 1.50 | 187.50 | NRL |
| Dec-19-13 | Communicate with Donna Johnson [REDACTED]<br>[REDACTED]   | 0.20 | 60.00  | APM |
|           | Review email, dated 12/19/13, from Donna<br>Johnson [REDACTED]  | 0.10 | 30.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Continued scanning of financial documents;<br>compare scanned to original for reference; burn<br>to DVD/CD for client; preparation of letter to<br>client transmitting same | 1.50 | 187.50 | NRL |
| Dec-30-13 | Review Zandian's motion to set aside default<br>judgment, dated 12/19/13.   | 0.40 | 120.00 | APM |
|           | Review Westlaw people map report of Zandian<br>[REDACTED]   | 0.60 | 180.00 | APM |
|           | Begin review of Wells Fargo documents.  | 0.90 | 270.00 | APM |
|           | Begin review of Bank of America documents.  | 0.30 | 90.00  | APM |
| Dec-31-13 | Finish review of Zandian's motion to set aside.   | 1.10 | 330.00 | APM |
|           | Finish review of Zandian's people map from<br>Westlaw [REDACTED]<br>[REDACTED]  | 0.50 | 150.00 | APM |
|           | Review detailed email, dated 12/22/13, from   | 0.30 | 90.00  | APM |

Jed Margolin [REDACTED]

|   |       |                   |     |
|---|-------|-------------------|-----|
| Draft email to Jed Margolin [REDACTED]                      | 0.10  | 30.00             | APM |
| Initial review records from Charles Schwab;<br>scan to file | 1.00  | 125.00            | NRL |
| Totals  | 19.00 | <u>\$4,527.50</u> |     |

**DISBURSEMENTS**

**Disbursements**

**Receipts**

|           |   |                 |               |
|-----------|---|-----------------|---------------|
| Jan-13-14 | Payment for invoice: 125011                                 |                 | 687.85        |
|           | Payment for invoice: 125011                                 |                 | 2,833.52      |
|           | Payment for invoice: 125011                                 |                 | 621.74        |
|           | Payment for invoice: 125011                                 |                 | 197.11        |
| Dec-09-13 | Photocopies 160 @ 0.25 - Service copies/2<br>SDTs           | 40.00           |               |
| Dec-10-13 | Witness fee Charles Schwab                                  | 25.00           |               |
|           | Witness fee - E-Trade Bank                                  | 25.00           |               |
|           | Postage   | 8.96            |               |
| Dec-11-13 | Photocopies 570 @ 0.25 - Motion for<br>judgment/debtor exam | 142.50          |               |
|           | Postage   | 24.48           |               |
| Dec-12-13 | Courier expense   | 16.00           |               |
|           | Courier expense   | 37.00           |               |
|           | Outside coping expense from BofA                            | 115.66          |               |
| Dec-18-13 | Photocopies 126 @ 0.25 - Banking documents                  | 31.50           |               |
| Dec-19-13 | Postage   | 1.72            |               |
| Dec-31-13 | Legal research documents                                    | 153.92          |               |
| Totals    |   | <u>\$621.74</u> | <u>\$0.00</u> |

|   |                   |
|---|-------------------|
| <b>Total Current Fees &amp; Disbursements</b> | <b>\$5,149.24</b> |
| Previous Balance                              | \$0.00            |
| Payments                                      | \$0.00            |
| <b>Balance Due Now</b>                        | <b>\$809.02</b>   |
| Approved By: _____                            |                   |

Retainer Balance: \$0.00

**Client shall pay Attorney's invoices on a Net 30 basis. Attorney may charge interest for any late payment of any sum due under this Agreement at the rate of eighteen percent (18%) per annum from the due date of the invoice until the date paid.**



**TRUST STATEMENT**

| <b>5457.01</b> |   | <b>Disbursements</b> | <b>Receipts</b>   |
|----------------|---|----------------------|-------------------|
|                | Trust Balance Forward                                 |                      | 4,340.22          |
| Jan-13-14      | Paid To: Watson Rounds<br>Payment for invoice: 125011 | 4,340.22             |                   |
|                | Total Trust   | <u>\$4,340.22</u>    | <u>\$4,340.22</u> |
|                | <b>Trust Balance</b>                                  |                      | <b>\$0.00</b>     |

**WATSON ROUNDS**

Tax ID#: 88-0319593

5371 Kietzke Lane

Reno, NV 89511

Ph: 775-324-4100

Fax: 775-333-8171

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

February 10, 2014

Attention:

File #: 5457.01

Inv #: 125472

RE: Patent theft analysis & litigation

| DATE      | DESCRIPTION  | HOURS | AMOUNT   | LAWYER |
|-----------|--|-------|----------|--------|
| Jan-02-14 | Review motion to stay proceedings  | 0.50  | 150.00   | MDF    |
| Jan-03-14 | Review and respond to detailed email, dated 1/3/14, from Jed Margolin [REDACTED] | 0.40  | 120.00   | APM    |
| Jan-06-14 | Review email, dated 1/6/14, and attachments, from Jed Margolin [REDACTED]        | 0.40  | 120.00   | APM    |
|           | Draft email to Jed Margolin [REDACTED]   | 0.10  | 30.00    | APM    |
| Jan-08-14 | Draft opposition to motion to set aside.   | 3.60  | 1,080.00 | APM    |
| Jan-09-14 | Review opposition to motion to set aside [REDACTED]                              | 0.50  | 150.00   | MDF    |
|           | Finish drafting opposition to motion to set aside default judgment.              | 4.90  | 1,470.00 | APM    |
|           | Revise proposed order on motion for debtor's examination.                        | 0.40  | 120.00   | APM    |
|           | Review email, dated 1/8/14, from Jed Margolin [REDACTED]                         | 0.10  | 30.00    | APM    |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Review/proof Opposition to Motion to Set Aside Judgment; compile exhibits; arrange for filing and delivery to court via RCMS "special"; compile service copies; file and serve  | 2.00 | 250.00 | NRL |
| Jan-13-14 | Communicate with Judge Russell's assistant regarding debtor's examination on 2/11/14 at 9:00 a.m.   | 0.20 | 60.00  | APM |
| Jan-14-14 | Conference with APM re: [REDACTED]  | 0.30 | 90.00  | MDF |
|           | Communicate with Angela, Judge Russell's assistant, regarding debtor's examination.   | 0.10 | 30.00  | APM |
|           | Begin preparing for debtor's examination.   | 0.30 | 90.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]  | 0.10 | 30.00  | APM |
|           | Telephone conference with staff from opposing counsel requesting transmittal of Opposition to Motion to Set Aside Judgment; [REDACTED]; transmit Opposition via email   | 0.50 | 62.50  | NRL |
| Jan-16-14 | Review and revise opposition to motion to stay proceedings; [REDACTED]<br>[REDACTED]/Review order granting debtor's exam  | 1.20 | 360.00 | MDF |
|           | Draft opposition to Zandian's motion to stay proceedings.   | 2.50 | 750.00 | APM |
|           | Review order granting motion for debtor examination, dated 1/13/14.   | 0.20 | 60.00  | APM |
|           | Review notice of entry of order for debtor's examination.   | 0.10 | 30.00  | APM |
|           | Review Opposition to Motion for Stay to Enforce Judgment; and Order Granting Plaintiff's Motion for Debtor Examination; preparation of draft Notice of Entry of Order; arrange for filing and service of documents; telephone conference with client [REDACTED] | 1.50 | 187.50 | NRL |

|           |  |       |            |     |
|-----------|--|-------|------------|-----|
|           | Preparation of memo of telephone conference with client  | 0.20  | 25.00      | NRL |
| Jan-17-14 | Communicate with Nancy Lindsley [REDACTED]<br>[REDACTED]   | 0.10  | 30.00      | APM |
|           | Review memo from Nancy Lindsley, dated 1/17/14, [REDACTED]   | 0.10  | 30.00      | APM |
|           | Review Wells Fargo documents in anticipation of preparation of SDT for deposit detail; telephone conference with client [REDACTED]<br>[REDACTED]                       | 1.00  | 125.00     | NRL |
| Jan-23-14 | Review reply in support of motion to set aside default judgment and affidavit in support thereof/Review request for submission of motion to set aside default judgment | 0.50  | 150.00     | MDF |
|           | Continue drafting questions for debtor's examination of Zandian.   | 0.30  | 90.00      | APM |
|           | Review and respond to email, dated 1/23/14, from Jed Margolin [REDACTED]<br>[REDACTED]   | 0.90  | 270.00     | APM |
|           | Research process of service on E*Trade as they have not responded to subpoena and they do not have any branches in Nevada.   | 0.30  | 90.00      | APM |
|           | Begin review Zandian's reply in support of motion to set aside default, dated 1/21/14.   | 0.20  | 60.00      | APM |
| Jan-28-14 | Review Federal Express from E*Trade Financial; duplicate for client; save to file  | 1.00  | 125.00     | NRL |
| Jan-29-14 | Preparation of email to client [REDACTED]<br>[REDACTED]  | 1.00  | 125.00     | NRL |
| Jan-31-14 | Draft and review e-mails to and from law clerk and client, et al. re: order denying motion to set aside  | 0.30  | 90.00      | MDF |
|           | Review email, dated 1/31/14, from Samantha Valerius, judge's law clerk, regarding request for proposed order.  | 0.10  | 30.00      | APM |
|           | Totals   | 25.90 | \$6,510.00 |     |

| <b>DISBURSEMENTS</b> |   | <b>Disbursements</b> | <b>Receipts</b>   |
|----------------------|---|----------------------|-------------------|
| Feb-10-14            | Payment for invoice: 125472   |                      | 559.25            |
|                      | Payment for invoice: 125472   |                      | 2,870.80          |
|                      | Payment for invoice: 125472   |                      | 295.00            |
|                      | Payment for invoice: 125472   |                      | 615.17            |
| Jan-09-14            | Photocopies 640 @ 0.25 - Opposition/request<br>for admissions/order | 160.00               |                   |
| Jan-10-14            | Courier expense   | 16.00                |                   |
| Jan-16-14            | Photocopies 64 @ 0.25 - Notice of entry                             | 16.00                |                   |
| Jan-19-14            | Postage   | 6.60                 |                   |
| Jan-29-14            | Courier expense   | 95.00                |                   |
|                      | Postage   | 1.40                 |                   |
|                      | Totals  | \$295.00             | \$0.00            |
|                      | <b>Total Current Fees &amp; Disbursements</b>                       |                      | <b>\$6,805.00</b> |
|                      | Previous Balance  |                      | \$809.02          |
|                      | Payments  |                      | \$809.02          |
|                      | <b>Balance Due Now</b>  |                      | <b>\$2,464.78</b> |
|                      | Approved By: _____  |                      |                   |

Retainer Balance: \$0.00

**Client shall pay Attorney's invoices on a Net 30 basis. Attorney may charge interest for any late payment of any sum due under this Agreement at the rate of eighteen percent (18%) per annum from the due date of the invoice until the date paid.**

**TRUST STATEMENT**

| <b>5457.01</b> |  | <b>Disbursements</b>    | <b>Receipts</b>         |
|----------------|--|-------------------------|-------------------------|
| Jan-24-14      | Received From: Jed Margolin<br>Trust receipt                             |                         | 5,149.24                |
|                | Paid To: Watson Rounds<br>Transfer of trust funds to account balance due | 809.02                  |                         |
| Feb-10-14      | Paid To: Watson Rounds<br>Payment for invoice: 125472                    | 4,340.22                |                         |
|                | <b>Total Trust</b>   | <hr/> <b>\$5,149.24</b> | <hr/> <b>\$5,149.24</b> |
|                | <b>Trust Balance</b>   |                         | <b>\$0.00</b>           |

**WATSON ROUNDS**

Tax ID#: 88-0319593

5371 Kietzke Lane  
Reno, NV 89511

Ph: 775-324-4100

Fax: 775-333-8171

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

March 7, 2014

Attention:

File #: 5457.01  
Inv #: 126244

RE: Patent theft analysis & litigation

| DATE      | DESCRIPTION   | HOURS | AMOUNT | LAWYER |
|-----------|---|-------|--------|--------|
| Feb-01-14 | Review and respond to email, dated 2/1/14, from Jed Margolin [REDACTED]             | 0.20  | 60.00  | APM    |
| Feb-03-14 | Review voicemail from Fred Sadri [REDACTED]   | 0.10  | 30.00  | APM    |
| Feb-04-14 | Begin drafting order denying motion to set aside.                                   | 0.10  | 30.00  | APM    |
| Feb-05-14 | Review and revise proposed order denying Defendants' Motion to Set aside [REDACTED] | 1.00  | 300.00 | MDF    |
|           | Review email, dated 2/5/14, from Jed Margolin [REDACTED]                            | 0.10  | 30.00  | APM    |
|           | Draft email to Jed Margolin [REDACTED]  | 0.10  | 30.00  | APM    |
|           | Review another email from Jed Margolin [REDACTED]                                   | 0.10  | 30.00  | APM    |





|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Call and email John Fayeghi regarding Zandian's non-response to order to produce documents prior to debtor's examination.                                     | 0.20 | 60.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Review order denying Zandian's motion to set aside judgment, dated 2/6/14.  | 0.30 | 90.00  | APM |
|           | Review Order Denying Motion to Set Aside Default Judgment; scan and transmit to opposing counsel; preparation of Notice of Entry of Judgment for filing       | 0.70 | 87.50  | NRL |
| Feb-10-14 | Conference with APM re: [REDACTED]<br>[REDACTED]<br>[REDACTED]  | 1.00 | 300.00 | MDF |
|           | Draft another email to John Fayeghi regarding tomorrow's debtor's examination of Zandian.   | 0.10 | 30.00  | APM |
|           | Draft debtor's examination questions.   | 0.10 | 30.00  | APM |
|           | Review and respond to email, dated 2/10/14, from John Fayeghi regarding debtor's examination  | 0.30 | 90.00  | APM |
|           | Draft email to Court regarding Zandian not appearing before the court tomorrow on debtor's examination.   | 0.80 | 240.00 | APM |
|           | Review email, dated 2/10/14, from Angela Jeffries regarding vacating debtor's examination and requesting a motion for order to show cause regarding contempt. | 0.20 | 60.00  | APM |
|           | Draft email to Angela Jeffries regarding vacating debtor's examination and requesting a motion for order to show cause regarding contempt.                    | 0.10 | 30.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Review Wells Fargo's response to \$55,000 transaction to Zandian.   | 0.20 | 60.00  | APM |

|           |  |       |            |     |
|-----------|--|-------|------------|-----|
|           | Review email, dated 2/10/14, from Jed Margolin [REDACTED]  | 0.30  | 90.00      | APM |
|           | Respond to Jed Margolin's email [REDACTED]   | 0.20  | 60.00      | APM |
| Feb-11-14 | Review and revise motion to show cause why Defendant should not be held in contempt [REDACTED]                                     | 1.30  | 390.00     | MDF |
|           | Draft Motion for Order to Show Cause Regarding Contempt, as requested by the court.  | 4.40  | 1,320.00   | APM |
|           | Reorganize file materials; review emails between APM and opposing counsel and court  | 1.00  | 125.00     | NRL |
| Feb-12-14 | Finish drafting motion for contempt sanctions.   | 0.10  | 30.00      | APM |
|           | Finalize Motion for Order to Show Cause Re Contempt vs. Zandian; compile exhibits; transmit for filing; serve via first class mail | 1.00  | 125.00     | NRL |
| Feb-24-14 | Review Zandian's substitution of attorney's, dated 2/21/14.  | 0.30  | 90.00      | APM |
|           | Draft email to Jed Margolin [REDACTED]   | 0.10  | 30.00      | APM |
|           | Review and respond to Jed Margolin's email, dated 2/24/14, [REDACTED]  | 0.10  | 30.00      | APM |
|           | Totals   | 20.80 | \$5,767.50 |     |

**DISBURSEMENTS**

**Disbursements**

**Receipts**

|           |                             |  |          |
|-----------|-----------------------------|--|----------|
| Mar-07-14 | Payment for invoice: 126244 |  | 249.69   |
|           | Payment for invoice: 126244 |  | 3,018.48 |
|           | Payment for invoice: 126244 |  | 73.29    |
|           | Payment for invoice: 126244 |  | 998.76   |

Invoice #: 126244

|           |   |         |                   |
|-----------|---|---------|-------------------|
| Feb-01-14 | Legal research documents                      | 59.69   |                   |
| Feb-10-14 | Postage                                       | 13.60   |                   |
|           |   | <hr/>   | <hr/>             |
|           | Totals  | \$73.29 | \$0.00            |
|           |   |         | <hr/>             |
|           | <b>Total Current Fees &amp; Disbursements</b> |         | <b>\$5,840.79</b> |
|           | Previous Balance                              |         | \$2,464.78        |
|           | Payments                                      |         | \$2,464.78        |
|           |   |         | <hr/>             |
|           | <b>Balance Due Now</b>                        |         | <b>\$1,500.57</b> |
|           | <b>Approved By:</b> _____                     |         |                   |

Retainer Balance: \$0.00

**Client shall pay Attorney's invoices on a Net 30 basis. Attorney may charge interest for any late payment of any sum due under this Agreement at the rate of eighteen percent (18%) per annum from the due date of the invoice until the date paid.**

**TRUST STATEMENT**

| <b>5457.01</b> |   | <b>Disbursements</b>    | <b>Receipts</b>         |
|----------------|---|-------------------------|-------------------------|
| Feb-26-14      | Received From: Jed Margolin<br>Trust receipt                    |                         | 6,805.00                |
|                | Paid To: Watson Rounds<br>Trust transfer to account balance due | 2,464.78                |                         |
| Mar-07-14      | Paid To: Watson Rounds<br>Payment for invoice: 126244           | 4,340.22                |                         |
|                | <b>Total Trust</b>  | <hr/> <b>\$6,805.00</b> | <hr/> <b>\$6,805.00</b> |
|                | <b>Trust Balance</b>  |                         | <b>\$0.00</b>           |

**WATSON ROUNDS**

Tax ID#: 88-0319593

5371 Kietzke Lane  
Reno, NV 89511

Ph: 775-324-4100

Fax: 775-333-8171

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

April 3, 2014

Attention:

File #: 5457.01  
Inv #: 126514

RE: Patent theft analysis & litigation

| DATE      | DESCRIPTION   | HOURS | AMOUNT | LAWYER |
|-----------|---|-------|--------|--------|
| Mar-04-14 | Review opposition to motion for order to show cause re: contempt/Draft and review e-mails to and from APM re: same, and reply arguments | 0.80  | 240.00 | MDF    |
|           | Review voicemail, dated 3/4/14, from Fred Sadri [REDACTED]  | 0.10  | 30.00  | APM    |
|           | Review Opposition to Motion for Order to Show Cause Regarding Contempt, dated 3/3/14.   | 0.70  | 210.00 | APM    |
|           | Draft email to Jed Margolin [REDACTED]  | 0.10  | 30.00  | APM    |
|           | Review and respond to email, dated 3/4/14, from Jed Margolin [REDACTED]   | 0.20  | 60.00  | APM    |
|           | Review email, dated 3/4/14, from Jed Margolin [REDACTED]  | 0.20  | 60.00  | APM    |
| Mar-05-14 | Review voicemail from Fred Sadri [REDACTED]   | 0.10  | 30.00  | APM    |

|           |  |      |          |     |
|-----------|--|------|----------|-----|
|           | Telephone conference with Fred Sadri<br>[REDACTED]   | 0.30 | 90.00    | APM |
|           | Review email, dated 3/5/14, from Jed Margolin<br>[REDACTED]  | 0.10 | 30.00    | APM |
|           | Review Opposition to Motion for OSC;<br>calendar reply to same; review Carson City<br>County website to confirm if Zandian owns real<br>property in Carson | 1.00 | 125.00   | NRL |
| Mar-08-14 | Review email, dated 3/8/14, from Jed Margolin<br>[REDACTED]  | 0.10 | 30.00    | APM |
| Mar-10-14 | Review attachments attached to 3/4/14 email<br>from Jed Margolin [REDACTED]  | 0.10 | 30.00    | APM |
| Mar-11-14 | Review Jed Margolin's comments [REDACTED]  | 0.50 | 150.00   | APM |
|           | Draft reply in support of motion for contempt<br>sanctions.  | 3.90 | 1,170.00 | APM |
| Mar-12-14 | Continue drafting reply in support of motion for<br>contempt sanctions.  | 1.60 | 480.00   | APM |
|           | Review email, dated 3/12/14, from Jed<br>Margolin [REDACTED]   | 0.20 | 60.00    | APM |
| Mar-13-14 | Review and revise Reply ISO Motion for Order<br>to Show Cause Regarding Contempt/Review<br>appellate documents, [REDACTED]                                 | 1.00 | 300.00   | MDF |
|           | Finish drafting reply in support of motion for<br>contempt sanctions.  | 0.20 | 60.00    | APM |
|           | Review notice of appeal.   | 0.20 | 60.00    | APM |
|           | Review case appeal statement.  | 0.20 | 60.00    | APM |
|           | Review notice of cash deposit by Zandian.  | 0.10 | 30.00    | APM |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Perform legal research [REDACTED]<br>[REDACTED]   | 0.30 | 90.00  | APM |
|           | Review and finalize Reply iso Motion for OSC;<br>preparation of Request for Submission;<br>telephone conference with Reno Carson<br>Messenger Service for special to Carson City to<br>file documents; review Notice of Appeal and<br>supporting documents; scan/email/save | 1.50 | 187.50 | NRL |
| Mar-14-14 | Download Appellate documents; change NV<br>Supreme Court profile  | 0.50 | 62.50  | NRL |
| Mar-17-14 | Download file-stamped documents; calendar<br>Nevada Supreme Court Appeal deadlines  | 1.00 | 125.00 | NRL |
| Mar-18-14 | Download and save appeal documents  | 0.50 | 62.50  | NRL |
| Mar-19-14 | Review order rejecting request for submission<br>relating to contempt application/Review<br>Nevada Supreme Court scheduling order re:<br>settlement conference  | 0.50 | 150.00 | MDF |
|           | Review email, dated 3/19/14, from Jed<br>Margolin [REDACTED]<br>[REDACTED]  | 0.20 | 60.00  | APM |
|           | Review Nevada Supreme Court docket; review<br>Order Denying Request for Submission; and<br>Notice of Assignment to Settlement Program;<br>calendar same   | 1.00 | 125.00 | NRL |
| Mar-20-14 | Conference with Adam Mcmillen re: [REDACTED]<br>[REDACTED]  | 0.50 | 150.00 | MDF |
|           | Communicate with Matt Frances [REDACTED]<br>[REDACTED]  | 0.40 | 120.00 | APM |
|           | Telephonce conference with Jed Margolin<br>[REDACTED]   | 0.90 | 270.00 | APM |
|           | Draft letter to Jason Woodbury requesting<br>debtor's examination and documents from<br>Zandian.  | 0.40 | 120.00 | APM |
|           | Review email, dated 3/20/14, from Jed<br>Margolin [REDACTED]  | 0.50 | 150.00 | APM |

|           |  |      |        |     |
|-----------|--|------|--------|-----|
|           | Finalize letter to Jason Woodbury; transmit via email and US Mail  | 0.20 | 25.00  | NRL |
| Mar-22-14 | Review email, dated 3/21/14, from Jed Margolin [REDACTED]  | 0.50 | 150.00 | APM |
| Mar-25-14 | Review email, dated 3/25/14, from Jed Margolin [REDACTED]  | 0.40 | 120.00 | APM |
|           | Review and respond to email, dated 3/25/14, from Jed Margolin [REDACTED]   | 0.20 | 60.00  | APM |
|           | Review and respond to email, dated 3/25/14, from Jed Margolin regarding [REDACTED]   | 0.40 | 120.00 | APM |
| Mar-26-14 | Review property title documents/Conference with APM re: [REDACTED]   | 1.00 | 300.00 | MDF |
|           | Review email, dated 3/26/14, from Jed Margolin [REDACTED]  | 0.30 | 90.00  | APM |
|           | Review email, dated 3/25/14, from Jed Margolin [REDACTED]  | 0.50 | 150.00 | APM |
|           | Review email, dated 3/26/14, from Jed Margolin [REDACTED]  | 0.30 | 90.00  | APM |
|           | Telephone call with Jed Margolin   | 0.60 | 180.00 | APM |
| Mar-27-14 | Review filed copy of district court docket entries, filed with supreme court on 3/25/14.   | 0.20 | 60.00  | APM |
|           | Review notes and research regarding exeuction vs real property; review Jed's email and enclosures; commence preparation of Motion for Writ of Exeuction; Execution; and, Notice of Execution | 2.00 | 250.00 | NRL |
| Mar-28-14 | Draft writ of execution.   | 0.20 | 60.00  | APM |
|           | Commence preparation of Motion for Writ of Execution, Writ of Execution and First Memorandum of Post-Judgment Costs and Fees; print client ledger to calculate and break down fees and costs | 2.50 | 312.50 | NRL |



|           |  |       |            |     |
|-----------|--|-------|------------|-----|
| Mar-31-14 | Review and respond to email, dated 3/31/14, from Jed Margolin [REDACTED]   | 0.10  | 30.00      | APM |
|           | Revise first memo of post-judgment costs and fees.   | 0.10  | 30.00      | APM |
|           | Revise writ of execution.  | 0.30  | 90.00      | APM |
|           | Review email, dated 3/28/14, from Jason Woodbury regarding Zandian's motion filed recently   | 0.30  | 90.00      | APM |
|           | Communicate with Jed Margolin [REDACTED]   | 0.20  | 60.00      | APM |
|           | Review email, dated 4/1/14, from Jed Margolin [REDACTED]   | 0.30  | 90.00      | APM |
|           | Review proposed motion for writ of execution.  | 0.30  | 90.00      | APM |
|           | Review voicemail from Fred Sadri and return his call.  | 0.10  | 30.00      | APM |
|           | Finalize First Memorandum of Costs; Motion for Issuance of Writ; recalculate interest; and preparation of of Affidavit and Request for Writ  | 2.00  | 250.00     | NRL |
|           | Finalize Motion for Writ of Execution; telephone conference with Steve Wood of Washoe County Sheriff's Office regarding service of Writs and requirements for same; update memo re same; preparation of twelve (12) Writs of Execution (10 for Washoe County, 2 for Clark County); telephone conference with Clerk regarding filing fee for issuance | 2.50  | 312.50     | NRL |
|           | Totals   | 35.40 | \$8,047.50 |     |

**DISBURSEMENTS****Disbursements****Receipts**

|           |                             |  |          |
|-----------|-----------------------------|--|----------|
| Apr-03-14 | Payment for invoice: 126514 |  | 1,113.81 |
|           | Payment for invoice: 126514 |  | 3,073.20 |

Invoice #: 126514

Page

Payment for invoice: 126514 122.08

Payment for invoice: 126514 691.01

|           |  |          |        |
|-----------|--|----------|--------|
| Mar-01-14 | Westlaw litigation documents/downloads | 33.09    |        |
| Mar-13-14 | Photocopies 36 @ 0.25 - Reply          | 9.00     |        |
|           | Postage                                | 0.90     |        |
| Mar-17-14 | Courier expense                        | 40.00    |        |
| Mar-20-14 | Postage                                | 0.48     |        |
| Mar-31-14 | Westlaw legal research documents       | 38.61    |        |
|           | Totals                                 | \$122.08 | \$0.00 |

**Total Current Fees & Disbursements** **\$8,169.58**

Previous Balance \$1,500.57

Payments \$1,500.47

**Balance Due Now** **\$3,169.58**

Approved By: \_\_\_\_\_

Retainer Balance: \$0.00

**Client shall pay Attorney's invoices on a Net 30 basis. Attorney may charge interest for any late payment of any sum due under this Agreement at the rate of eighteen percent (18%) per annum from the due date of the invoice until the date paid.**

**TRUST STATEMENT**

| <b>5457.01</b> |   | <b>Disbursements</b> | <b>Receipts</b>   |
|----------------|---|----------------------|-------------------|
| Mar-21-14      | Received From: Jed Margolin<br>Trust receipt                          |                      | 5,840.79          |
|                | Paid To: Watson Rounds<br>Transfer to outstanding account balance due | 1,500.47             |                   |
| Mar-27-14      | Received From: Jed Margolin<br>Trust receipt                          |                      | 659.78            |
| Apr-03-14      | Paid To: Watson Rounds<br>Payment for invoice: 126514                 | 5,000.10             |                   |
|                | Total Trust   | <u>\$6,500.57</u>    | <u>\$6,500.57</u> |
|                | <b>Trust Balance</b>  |                      | <b>\$0.00</b>     |

Jed Margolin  
1981 Empire Road  
Reno, Nevada 89521-7430

April 24, 2014

Attention:  
RE: Patent theft analysis & litigation

File #: 5457.01  
Inv #: Sample

| DATE      | DESCRIPTION  | HOURS | AMOUNT | LAWYER |
|-----------|--|-------|--------|--------|
| Apr-01-14 | Reveiw Clark County and Washoe County deeds for insertion of legal description into Writs of Execution; revise Writs of Execution for issuance | 1.00  | 125.00 | NRL    |
|           | Review emails; calendar response to Motion for Writ of Execution   | 0.50  | 62.50  | NRL    |
| Apr-02-14 | Review Zandian's Motion to Dismiss and related documents/Review and revise Supreme Court mediation brief/ [REDACTED]                           | 1.00  | 300.00 | MDF    |
|           | Review email, dated 4/2/14, from Jed Margolin [REDACTED]   | 0.10  | 30.00  | APM    |
|           | Review Zandian's motion to dismiss and vacate default judgment.  | 1.20  | 360.00 | APM    |
|           | Draft email to Jason Woodbury regarding debtor's examination and bizarre motion filed by Zandian.  | 0.10  | 30.00  | APM    |
|           | Review file stamped motion to dismiss in Abrishami v Gold Canyon, dated 3/24/14.   | 0.60  | 180.00 | APM    |
|           | Review file-stamped motion, dated 3/24/14.   | 0.30  | 90.00  | APM    |
|           | Telephone conference with Fred Sadri.  | 0.20  | 60.00  | APM    |
|           | Review letter, dated 12/4/13, from Kristin Luis to Judge Wilson regarding Gold Canyon case.  | 0.20  | 60.00  | APM    |
|           | Review and respond to email, dated 4/2/14, from Jed Margolin [REDACTED]  | 0.20  | 60.00  | APM    |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Draft confidential settlement brief.  | 2.80 | 840.00 | APM |
|           | Brief review Motion and supporting documents filed by Zandian; calendar response to same  | 1.00 | 125.00 | NRL |
| Apr-03-14 | Finish drafting confidential settlement brief.  | 0.60 | 180.00 | APM |
|           | Review/revise Respondent's Confidential Settlement Conference Statement; transmit via fax; telephone conference with RCMS regarding hand delivery to PO Box in Glenbrook (need to affix postage for delivery) | 1.00 | 125.00 | NRL |
|           | Telephone conference with Reno Carson Messenger Service to arrange for personal delivery of Settlement Conference Statement to PO Box in Glenbrook; second call to confirm delivery made                      | 0.50 | 62.50  | NRL |
| Apr-04-14 | Review notification from Supreme Court of Zandian's filing of docketing statement   | 0.10 | 30.00  | APM |
|           | Review Zandian's docketing statement  | 0.50 | 150.00 | APM |
|           | Review issued notice for Zandian to provide proof of service of docketing statement upon settlement judge.  | 0.20 | 60.00  | APM |
| Apr-07-14 | Review filed proof of service affidavit of service of docketing statement, dated 4/7/14   | 0.10 | 30.00  | APM |
|           | Review and download filed Appellate documents   | 0.50 | 62.50  | NRL |
| Apr-08-14 | Review email, dated 4/8/14, from Jed Margolin [REDACTED]  | 0.20 | 60.00  | APM |
|           | Review supreme court forms for responding to Zandian's docketing statement  | 0.50 | 150.00 | APM |
|           | Telephone call with Jed Margolin [REDACTED]   | 1.00 | 300.00 | APM |
|           | Review email, dated 4/8/14, from Jed Margolin [REDACTED]  | 0.20 | 60.00  | APM |
|           | Telephone conference with Steve Wood of the Washoe County Sheriff's office re execution   | 0.50 | 62.50  | NRL |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | vs. real properties; left message for Christie of First JD regarding issuance of Writs; download motion recently filed by Zandian |      |        |     |
| Apr-09-14 | Draft opposition to Zandian's motion to dismiss   | 0.20 | 60.00  | APM |
|           | Review and respond to emails, dated 4/9/14, from Jason Woodbury regarding Zandian's motion to dismiss                             | 0.30 | 90.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]  | 0.10 | 30.00  | APM |
|           | Review and respond to email from Nancy Lindsley [REDACTED]  | 0.20 | 60.00  | APM |
|           | Telephone conference with Court Clerk re issuance of Writs; preparation of memo to APM re same                                    | 0.30 | 37.50  | NRL |
| Apr-10-14 | Review Motion to Retax and Settle Costs; calendar response to same  | 0.50 | 62.50  | NRL |
| Apr-11-14 | Review and respond to email, dated 4/11/14, from Jed Margolin [REDACTED]<br>[REDACTED]<br>[REDACTED]                              | 0.20 | 60.00  | APM |
| Apr-14-14 | Meet with Matt Francis [REDACTED]<br>[REDACTED]<br>[REDACTED]   | 0.30 | 90.00  | APM |
|           | Review email, dated 4/14/14, from Jed Margolin [REDACTED]   | 0.20 | 60.00  | APM |
|           | Draft email to Jason Woodbury regarding stipulation to withdraw motion to dismiss from Zandian                                    | 0.10 | 30.00  | APM |
|           | Review and respond to another email, dated 4/14/14, from Jed Margolin [REDACTED]  | 0.10 | 30.00  | APM |
|           | Revise declaration for JP Lee, gather old letters regarding same and draft email to JP Lee requesting him to sign new declaration | 0.70 | 210.00 | APM |
|           | Review filed copy of District court Docket Entries, dated 4/10/14   | 0.10 | 30.00  | APM |
|           | Review email, dated 4/14/14, from   | 0.10 | 30.00  | APM |

|           |   |      |        |     |
|-----------|---|------|--------|-----|
|           | Jason Woodbury regarding stipulation to withdraw Zandian's motion to dismiss                          |      |        |     |
|           | Review first draft of Jason Woodbury's proposed stipulation to withdraw Zandian's motion to dismiss   | 0.10 | 30.00  | APM |
|           | Draft emails to Jason Woodbury regarding proposed stipulation to withdraw Zandian's motion to dismiss | 0.20 | 60.00  | APM |
|           | Transmit executed Stipulation and Order to Withdraw Motion to Jason Woodbury                          | 0.50 | 62.50  | NRL |
| Apr-15-14 | Review motion to retax costs/Emails with APM re: same   | 0.50 | 150.00 | MDF |
|           | Begin review of Zandian's motion to retax, dated 4/9/14   | 0.20 | 60.00  | APM |
|           | Review email, dated 4/15/14, from Tiffany Dube regarding request for declaration from JP Lee          | 0.10 | 30.00  | APM |
|           | Review letter, dated 4/15/14, from JP Lee regarding request for declaration                           | 0.10 | 30.00  | APM |
| Apr-16-14 | Finish review of Zandian's motion to retax  | 1.40 | 420.00 | APM |
|           | Begin drafting opposition to Zandian's motion to retax  | 1.70 | 510.00 | APM |
|           | Review and respond to email, dated 4/15/14, from Jed Margolin [REDACTED]                              | 0.30 | 90.00  | APM |
|           | Meet with Matt Francis [REDACTED]   | 0.30 | 90.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]  | 0.20 | 60.00  | APM |
|           | Communicate with David Wasick regarding mediation   | 0.10 | 30.00  | APM |
|           | Draft email to Jed Margolin [REDACTED]  | 0.10 | 30.00  | APM |

|           |  |      |          |     |
|-----------|--|------|----------|-----|
|           | Draft motion for post judgment fees and costs  | 3.40 | 1,020.00 | APM |
|           | Review email, dated 4/17/14, from Jason Woodbury regarding settlement conference in May                                  | 0.10 | 30.00    | APM |
|           | Generate report reflecting costs incurred from 6/26/2013 to present; commence preparation of revised Memorandum of Costs | 0.80 | 100.00   | NRL |
| Apr-17-14 | Review emails re: settlement issues/Conference with APM re: same and Voicemail from David Wasick                         | 0.50 | 150.00   | MDF |
|           | Review and respond to emails, dated 4/18/14, from Jed Margolin [REDACTED]<br>[REDACTED]<br>[REDACTED]                    | 0.30 | 90.00    | APM |
| Apr-18-14 | Draft email to David Wasick and Woodbury regarding settlement conference   | 0.20 | 60.00    | APM |
|           | Review email, dated 4/18/14, from David Wasick setting settlement conference for May 21, 2014                            | 0.10 | 30.00    | APM |
|           | Draft email to Jed Margolin [REDACTED]<br>[REDACTED]   | 0.10 | 30.00    | APM |
|           | Finish drafting motion for postjudgment fees and costs   | 1.60 | 480.00   | APM |
|           | Review Supreme Court of Nevada's notice of filed copy of district court docket entries                                   | 0.10 | 30.00    | APM |
|           | Review and respond to email, dated 4/18/14, from Jed Margolin [REDACTED]<br>[REDACTED]                                   | 0.10 | 30.00    | APM |
|           | Generate reports from PCLaw for fees and costs from October 21, 2013 through April 21, 2014                              | 0.50 | 62.50    | NRL |
|           | Review/proof Motion for Order Allowing Costs and APM Dec iso same; compile exhibits                                      | 1.00 | 125.00   | NRL |



|        |       |            |
|--------|-------|------------|
| Totals | 33.10 | \$8,425.00 |
|--------|-------|------------|

**FEE SUMMARY:**

| Lawyer             | Hours | Effective Rate | Amount     |
|--------------------|-------|----------------|------------|
| Matthew D. Francis | 2.00  | \$300.00       | \$600.00   |
| Adam P. McMillen   | 22.50 | \$300.00       | \$6,750.00 |
| Nancy R. Lindsley  | 8.60  | \$125.00       | \$1,075.00 |

**DISBURSEMENTS**

|           |                           | Disbursements | Receipts |
|-----------|---------------------------|---------------|----------|
| Apr-01-14 | Court documents via Pacer | 1.50          |          |
| Apr-02-14 | Postage                   | 3.08          |          |
| Apr-04-14 | Process service expense   | 65.00         |          |
| Apr-09-14 | Postage                   | 1.40          |          |
|           | Totals                    | \$70.98       | \$0.00   |

**Total Fees & Disbursements**

**\$8,495.98**

Previous Balance

\$3,169.58

Previous Payments

\$0.00

**Balance Due Now**

**\$11,665.56**

**AMOUNT QUOTED:**

**\$0.00**

# Exhibit 4

Exhibit 4

| Date        | Entry # | Received From/Paid To<br>Explanation                             | Chq#<br>Rec# | General |        | Fees | Bld  |        | Trust Activity |       | Balance |
|-------------|---------|--|--------------|---------|--------|------|------|--------|----------------|-------|---------|
|             |         |  |              | Rcpts   | Disbs  |      | Inv# | Acc    | Rcpts          | Disbs |         |
| 5457        |         | Margolin, Jed  |              |         |        |      |      |        |                |       |         |
| 5457.01     |         | Patent theft analysis & litigation                               |              |         |        |      |      |        |                |       |         |
| Oct 22/2013 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1115832 | Process service expense  |              |         |        |      |      | 124091 |                |       |         |
| Nov 7/2013  |         | Billing on Invoice 124091  |              |         |        |      |      |        |                |       |         |
|             | 1117911 | FEES 3512.50   |              |         |        |      |      | 124091 |                |       |         |
|             |         | DISBS 194.20   |              |         |        |      |      |        |                |       |         |
| Nov 13/2013 |         | Bank of America  |              |         |        |      |      |        |                |       |         |
|             | 1118672 | Witness fee subpoena for Bank of America                         | 2475         |         |        |      |      | 124555 |                |       |         |
| Nov 13/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1120227 | Postage  | 16627        |         | 5.28   |      |      | 124555 |                |       |         |
| Nov 18/2013 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1119582 | Process service expense  |              |         |        |      |      | 124555 |                |       |         |
| Dec 9/2013  |         | Billing on Invoice 124555  |              |         |        |      |      |        |                |       |         |
|             | 1121920 | FEES 577.50  |              |         |        |      |      | 124555 |                |       |         |
|             |         | DISBS 82.28  |              |         |        |      |      |        |                |       |         |
| Dec 9/2013  |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1124586 | Photocopies 160 @ 0.25 - Service copies/2 SDTs                   | 16680        |         | 40.00  |      |      | 125011 |                |       |         |
| Dec 10/2013 |         | Charles Schwab & Co., Inc.                                       |              |         |        |      |      |        |                |       |         |
|             | 1122115 | Witness fee Charles Schwab                                       | 2569         |         | 25.00  |      |      | 125011 |                |       |         |
| Dec 10/2013 |         | E-Trade Bank   |              |         |        |      |      |        |                |       |         |
|             | 1122117 | Witness fee - E-Trade Bank                                       | 2570         |         | 25.00  |      |      | 125011 |                |       |         |
| Dec 10/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1123859 | Postage  | 16668        |         | 8.96   |      |      | 125011 |                |       |         |
| Dec 11/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1123860 | Postage  | 16668        |         | 24.48  |      |      | 125011 |                |       |         |
| Dec 11/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1124587 | Photocopies 570 @ 0.25 - Motion for judgment/debtor exam         | 16680        |         | 142.50 |      |      | 125011 |                |       |         |
| Dec 12/2013 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1123048 | Courier expense  |              |         |        |      |      | 125011 |                |       |         |
| Dec 12/2013 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1123301 | Courier expense  |              |         |        |      |      | 125011 |                |       |         |
| Dec 12/2013 |         | Bank of America  |              |         |        |      |      |        |                |       |         |
|             | 1123303 | Outside coping expense from BofA                                 |              |         |        |      |      | 125011 |                |       |         |
| Dec 18/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1124598 | Photocopies 126 @ 0.25 - Banking documents                       | 16680        |         | 31.50  |      |      | 125011 |                |       |         |
| Dec 19/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1124611 | Postage  | 16680        |         | 1.72   |      |      | 125011 |                |       |         |
| Dec 31/2013 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1124658 | Legal research documents   | 16682        |         | 153.92 |      |      | 125011 |                |       |         |
| Jan 9/2014  |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1128654 | Photocopies 640 @ 0.25 - Opposition/request for admissions/order | 16712        |         | 160.00 |      |      | 125472 |                |       |         |
| Jan 10/2014 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1125835 | Courier expense  |              |         |        |      |      | 125472 |                |       |         |
| Jan 13/2014 |         | Billing on Invoice 125011  |              |         |        |      |      |        |                |       |         |
|             | 1125944 | FEES 4527.50   |              |         |        |      |      | 125011 |                |       |         |
|             |         | DISBS 621.74   |              |         |        |      |      |        |                |       |         |
| Jan 16/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1128655 | Photocopies 64 @ 0.25 - Notice of entry                          | 16712        |         | 16.00  |      |      | 125472 |                |       |         |
| Jan 19/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1127892 | Postage  | 16707        |         | 6.60   |      |      | 125472 |                |       |         |
| Jan 29/2014 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1128111 | Courier expense  |              |         |        |      |      | 125472 |                |       |         |
| Jan 29/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1128663 | Postage  | 16712        |         | 1.40   |      |      | 125472 |                |       |         |
| Feb 1/2014  |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1129997 | Legal research documents   | 16730        |         | 59.69  |      |      | 126244 |                |       |         |
| Feb 10/2014 |         | Billing on Invoice 125472  |              |         |        |      |      |        |                |       |         |
|             | 1129614 | FEES 6510.00   |              |         |        |      |      | 125472 |                |       |         |
|             |         | DISBS 295.00   |              |         |        |      |      |        |                |       |         |
| Feb 10/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1131350 | Postage  | 16741        |         | 13.60  |      |      | 126244 |                |       |         |
| Mar 1/2014  |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1134969 | Westlaw litigation documents/downloads                           | 16783        |         | 33.09  |      |      | 126514 |                |       |         |
| Mar 7/2014  |         | Billing on Invoice 126244  |              |         |        |      |      |        |                |       |         |
|             | 1133801 | FEES 5767.50   |              |         |        |      |      | 126244 |                |       |         |
|             |         | DISBS 73.29  |              |         |        |      |      |        |                |       |         |
| Mar 13/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1135051 | Postage  | 16784        |         | 0.90   |      |      | 126514 |                |       |         |
| Mar 13/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1136514 | Photocopies 36 @ 0.25 - Reply                                    | 16803        |         | 9.00   |      |      | 126514 |                |       |         |
| Mar 17/2014 |         | Reno/Carson Messenger Service, Ir                                |              |         |        |      |      |        |                |       |         |
|             | 1134803 | Courier expense  |              |         |        |      |      | 126514 |                |       |         |
| Mar 20/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1136522 | Postage  | 16803        |         | 0.48   |      |      | 126514 |                |       |         |
| Mar 31/2014 |         | Expense Recovery   |              |         |        |      |      |        |                |       |         |
|             | 1137167 | Westlaw legal research documents                                 | 16810        |         | 38.61  |      |      | 126514 |                |       |         |
| Apr 1/2014  |         | First Judicial District Court                                    |              |         |        |      |      |        |                |       |         |
|             | 1136733 | Fee for issuance of Writ of Execution                            | 3004         |         | 120.00 |      |      |        |                |       | 2383    |
| Apr 3/2014  |         | Billing on Invoice 126514  |              |         |        |      |      |        |                |       |         |
|             | 1137393 | FEES 8047.50   |              |         |        |      |      | 126514 |                |       |         |

| Date       | Received From/Paid To  | Chq# | ----- General ----- |       |      | Bld  | ----- Trust Activity ----- |       |       |         |
|------------|--|------|---------------------|-------|------|------|----------------------------|-------|-------|---------|
| Entry #    | Explanation  | Rec# | Rcpts               | Disbs | Fees | Inv# | Acc                        | Rcpts | Disbs | Balance |
| Apr 4/2014 | DISBS 122.08   |      |                     |       |      |      |                            |       |       |         |
| 1137826    | Reno/Carson Messenger Service, In<br>Process service expense |      |                     | 65.00 |      |      |                            |       |       |         |

| UNBILLED         |        |         |         |         | BILLED   |           |       |            | BALANCES |          |
|------------------|--------|---------|---------|---------|----------|-----------|-------|------------|----------|----------|
| TOTALS           | CHE    | + RECOV | + FEES  | = TOTAL | DISBS    | + FEES    | + TAX | - RECEIPTS | = A/R    | TRUST    |
| PERIOD           | 185.00 | 0.00    | 8275.00 | 8460.00 | 1246.39  | 25895.00  | 0.00  | 30331.09   | -3189.70 | -1109.14 |
| END DATE         | 185.00 | 0.00    | 8275.00 | 8460.00 | 27048.52 | 124026.25 | 0.00  | 151074.77  | 0.00     | 0.00     |
| General Retainer |        |         | 5000.00 |         |          |           |       |            |          |          |

| UNBILLED         |        |         |         |         | BILLED   |           |       |            | BALANCES |          |
|------------------|--------|---------|---------|---------|----------|-----------|-------|------------|----------|----------|
| TOTALS           | CHE    | + RECOV | + FEES  | = TOTAL | DISBS    | + FEES    | + TAX | - RECEIPTS | = A/R    | TRUST    |
| PERIOD           | 185.00 | 0.00    | 8275.00 | 8460.00 | 1246.39  | 25895.00  | 0.00  | 30331.09   | -3189.70 | -1109.14 |
| END DATE         | 185.00 | 0.00    | 8275.00 | 8460.00 | 27048.52 | 124026.25 | 0.00  | 151074.77  | 0.00     | 0.00     |
| General Retainer |        |         | 5000.00 |         |          |           |       |            |          |          |

REPORT SELECTIONS - Client Ledger

Layout Template Default  
Advanced Search Filter None  
Requested by Nancy  
Finished Monday, April 21, 2014 at 02:05:26 PM  
Ver 13.0 SP1 (13.0.20131028)  
Matters 5457.01  
Clients All  
Major Clients All  
Client Intro Lawyer All  
Matter Intro Lawyer All  
Responsible Lawyer All  
Assigned Lawyer All  
Type of Law All  
Select From Active, Inactive, Archived Matters  
Matters Sort by Default  
New Page for Each Lawyer No  
New Page for Each Matter No  
No Activity Date Dec/31/2199  
Firm Totals Only No  
Totals Only No  
Entries Shown - Billed Only No  
Entries Shown - Disbursements Yes  
Entries Shown - Receipts No  
Entries Shown - Time or Fees No  
Entries Shown - Trust No  
Incl. Matters with Retainer Bal No  
Incl. Matters with Neg Unbld Disb No  
Trust Account All  
Working Lawyer All  
Include Corrected Entries No  
Show Check # on Paid Payables No  
Show Client Address No  
Consolidate Payments No  
Show Trust Summary by Account No  
Show Interest No  
Interest Up To Apr/21/2014  
Show Invoices that Payments Were Applied to No  
Display Entries in Date Order

# Exhibit 5

Exhibit 5

**CHECK REQUEST FORM**

PAYABLE TO Wells Fargo Bank, N.A. DATE NEEDED: \_\_\_\_\_  
DESCRIPTION: Witness Fee - Subpoena  
ADDRESS (IF APPLICABLE): \_\_\_\_\_  
AMOUNT: \$25  
CLIENT NAME/MATTER#: 5457.01  
REQUESTED BY/ATTORNEY APPROVAL: APM  
MAIL CHECK FROM ACCOUNTING: YES/(NO)  
RETURN CHECK TO: Nancy  
DISPENSE FROM: GENERAL TRUST

FOR ACCOUNTING USE ONLY:

DATE OF CHECK: \_\_\_\_\_  
CHECK #: \_\_\_\_\_  
GL ACCOUNT: \_\_\_\_\_

4/8/99-Accounting/Payroll & exps/Forms

NOTES:

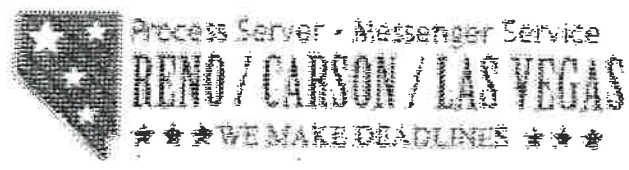
**WATSON ROUNDS**  
GENERAL CHECKING ACCOUNT

2389

Date: Oct 18/13 Matter #: 5457.01  
Amount: \$25.00 Claim Number: \_\_\_\_\_  
Payable To: Wells Fargo Bank  
Client: Margolin, Jed  
Matter Description: Patent theft analysis & litigation  
Explanation: Witness fee subpoena for Wells Fargo  
Invoice #: \_\_\_\_\_

2386

Reno/Carson Messenger Service, Inc.  
185 Martin Street  
Reno, NV 89509  
775.322.2424  
Federal Tax ID: 88-0306306  
NV STATE LIC#322



Invoice #: 38183  
Date: 10/22/2013



RECEIVED  
OCT 23 2013  
WATSON ROUNDS

**INVOICE FOR SERVICE:**

WATSON ROUNDS  
5371 KIETZKE LN,  
RENO, NV 89511

**Amount Due: \$52.00**

Phone number: 775 324-4100  
Fax number: 775 333-8171  
Email Address:

Requestor: NANCY  
Your File# , 5457-01

Service #39380: WELLS FARGO BANK, N.A.  
Manner of Service: CUSTODIAN OF RECORDS

Completion Information/Recieved by:SUSAN DOBYNS  
Service Date/Time:10/22/2013 11:10 AM  
Service address:5340 KIETZKE LANE RENONV 89511  
Served by:MATTHEW BAKER R-016102

| Sex             | Color of skin/race | Color of hair | Age | Height | Weight |
|-----------------|--------------------|---------------|-----|--------|--------|
| Female          | Caucasian          | Blonde        | 55  | 5'9"   | 130    |
| Other Features: |                    |               |     |        |        |

IN THE FIRST JUDICIAL DISTRICT COURT-IN AND FOR THE COUNTY OF CARSON CITY, STATE OF NEVADA  
JED MARGOLIN v. OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION, ET AL

Service Documents: SECOND AMENDED SUBPOENA DUCES TECUM; WITNESS FEE \$25.00

CASE#: 090C00579 1B

Service Comments:

|                       |                |
|-----------------------|----------------|
| Standard Service      | \$37.00        |
| RUSH                  | \$15.00        |
| <b>TOTAL CHARGES:</b> | <b>\$52.00</b> |
| <b>BALANCE:</b>       | <b>\$52.00</b> |

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH FINANCE CHARGE

**CHECK REQUEST FORM**

PAYABLE TO Bank of America DATE NEEDED: \_\_\_\_\_  
 DESCRIPTION: Subpoena Witness Fee  
 ADDRESS (IF APPLICABLE): \_\_\_\_\_  
 AMOUNT: \$25.00  
 CLIENT NAME/MATTER#: 5457.01  
 REQUESTED BY/ATTORNEY APPROVAL: \_\_\_\_\_  
 MAIL CHECK FROM ACCOUNTING: \_\_\_\_\_ YES/(NO)  
 RETURN CHECK TO: Nancy  
 DISPENSE FROM: GENERAL TRUST

FOR ACCOUNTING USE ONLY:

DATE OF CHECK: \_\_\_\_\_  
 CHECK #: \_\_\_\_\_  
 GL ACCOUNT: \_\_\_\_\_

4/8/99-Accounting/Payroll & exps/Forms

NOTES:

**WATSON ROUNDS**  
 GENERAL CHECKING ACCOUNT

2475

Date: Nov 13/13 Matter #: 5457.01  
 Amount: \$25.00 Claim Number:  
 Payable To: Bank of America  
 Client: Margolin, Jed  
 Matter Description: Patent theft analysis & litigation  
 Explanation: Witness fee subpoena for Bank of America  
 Invoice #:



Reno/Carson Messenger Service, Inc.  
185 Martin Street  
Reno, NV 89509  
775.322.2424  
Federal Tax ID: 88-0306306  
NV STATE LIC#322



**INVOICE FOR SERVICE:**

WATSON ROUNDS  
5371 KIETZKE LN,  
RENO, NV 89511

**RECEIVED**  
**NOV 19 2013**  
**WATSON ROUNDS**

**Amount Due: \$52.00**

Phone number: 775 324-4100  
Fax number: 775 333-8171  
Email Address:

Requestor: NANCY  
Your File# 5457.01

Service #40598: BANK OF AMERICA  
Manner of Service: CUSTODIAN OF RECORDS

Completion Information/Received by: WENDY FRANCO  
Service Date/Time: 11/13/2013 1:07 PM  
Service address: 5905 S. VIRGINIA ST. RENO NV 89502  
Served by: MIKE JONES R-023632

| Sex             | Color of skin/race | Color of hair | Age | Height | Weight |
|-----------------|--------------------|---------------|-----|--------|--------|
| Female          | Caucasian          | Black         | 38  | 5'9    | 135    |
| Other Features: |                    |               |     |        |        |

IN THE FIRST JUDICIAL DISTRICT COURT-IN AND FOR THE COUNTY OF CARSON CITY, STATE OF NEVADA  
JED MARGOLIN v. OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION, ET AL

Service Documents: SUBPOENA DUCES TECUM; LETTER; WITNESS FEE \$25.00

CASE#: 090C00579 1B

Service Comments:

|                       |                |
|-----------------------|----------------|
| Standard Service      | \$37.00        |
| RUSH                  | \$15.00        |
| <b>TOTAL CHARGES:</b> | <b>\$52.00</b> |
| <b>BALANCE:</b>       | <b>\$52.00</b> |

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH  
FINANCE CHARGE

**CHECK REQUEST FORM**

PAYABLE TO CHARLES SCHWAB & CO., INC. DATE NEEDED: \_\_\_\_\_  
DESCRIPTION: WITNESS FEE - SUBPOENA DUCES TECUM  
ADDRESS (IF APPLICABLE): \_\_\_\_\_  
AMOUNT: \$25.00  
CLIENT NAME/MATTER#: 5457.01  
REQUESTED BY/ATTORNEY APPROVAL: APM  
MAIL CHECK FROM ACCOUNTING: YES/(NO)  
RETURN CHECK TO: Nancy (Thank you!)  
DISPENSE FROM: GENERAL TRUST

FOR ACCOUNTING USE ONLY:

DATE OF CHECK: \_\_\_\_\_  
CHECK #: \_\_\_\_\_  
GL ACCOUNT: \_\_\_\_\_

4/8/99-Accounting/Payroll & exps/Forms

NOTES:



**WATSON ROUNDS**  
GENERAL CHECKING ACCOUNT

2569

~~Date:~~ Dec 10/13 Matter #: 5457.01  
Amount: \$25.00 Claim Number:  
Payable To: Charles Schwab & Co., Inc.  
Client: Margolin, Jed  
Matter Description: Patent theft analysis & litigation  
Explanation: Witness fee Charles Schwab  
Invoice #:

2390

**CHECK REQUEST FORM**

PAYABLE TO **E-TRADE BANK** DATE NEEDED: \_\_\_\_\_

DESCRIPTION: *Witness Fee - Subpoena Duces Tecum*

ADDRESS (IF APPLICABLE): \_\_\_\_\_

AMOUNT: \$25.00

CLIENT NAME/MATTER#: 5457.01

REQUESTED BY/ATTORNEY APPROVAL: APM

MAIL CHECK FROM ACCOUNTING: YES/(NO)

RETURN CHECK TO: Nancy

DISPENSE FROM: GENERAL TRUST

FOR ACCOUNTING USE ONLY:

DATE OF CHECK: \_\_\_\_\_

CHECK #: \_\_\_\_\_

GL ACCOUNT: \_\_\_\_\_

4/8/99-Accounting/Payroll & exps/Forms

NOTES:

**WATSON ROUNDS**  
GENERAL CHECKING ACCOUNT

2570

Date: Dec 10/13 Matter #: 5457.01

Amount: \$25.00 Claim Number:

Payable To: E-Trade Bank

Client: Margolin, Jed

Matter Description: Patent theft analysis & litigation

Explanation: Witness fee - E-Trade Bank

Invoice #:

2391

Reno/Carson Messenger Service, Inc.  
185 Martin Street  
Reno, NV 89509  
775.322.2424  
Federal Tax ID: 88-0306306  
NV STATE LIC#322

RECEIVED  
DEC 13 2013  
WATSON ROUNDS



**INVOICE FOR SERVICE:**

**Amount Due: \$16.00**

WATSON ROUNDS  
5371 KIETZKE LN,  
RENO, NV 89511

RECEIVED  
DEC 13 2013  
WATSON ROUNDS

Phone number: 775 324-4100  
Fax number: 775 333-8171  
Email Address:

Requestor: NONE  
Your File# 5457.01

Service #41830: COURIER/MESSENGER JOB  
Manner of Service: MESSENGER  
Service Instructions: PLEASE FILE AND RETURN

Completion Information/Recieved by: J. HIGGINS  
Service Date/Time: 12/11/2013 3:12 PM  
Service address: FIRST JUDICIAL 885 EAST MUSSER ST CARSON CITY NV 89701  
Served by: WADE MORLAN R-006823

| Sex             | Color of skin/race | Color of hair | Age | Height | Weight |
|-----------------|--------------------|---------------|-----|--------|--------|
| N/A             | N/A                | N/A           |     | N/A    | N/A    |
| Other Features: |                    |               |     |        |        |

Service Documents:  
Service Comments:

CASE#:

MESSENGER

\$16.00

**TOTAL CHARGES:**

**\$16.00**

**BALANCE:**

**\$16.00**

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH FINANCE CHARGE



775.322.2424  
Federal Tax ID: 88-0306306  
NV STATE LIC#322

**INVOICE FOR SERVICE:**

WATSON ROUNDS  
5371 KIETZKE LN,  
RENO, NV 89511

RECEIVED

Amount Due: \$37.00

DEC 16 2013

WATSON ROUNDS

Phone number: 775 324-4100  
Fax number: 775 333-8171  
Email Address:

Requestor: NANCY  
Your File# 5457.01

Service #41817: CHARLES SCHWAB & CO., INC.  
Manner of Service: CORPORATE

Completion Information/Recieved by: ALENA DUGGAN  
Service Date/Time: 12/11/2013 2:07 PM  
Service address: 311 S. DIVISION ST THE CORPORATION TRUST COMPANY OF NEVADA  
Carson City NV 89703  
Served by: WADE MORLAN R-006823

| Sex             | Color of skin/race | Color of hair | Age   | Height        | Weight      |
|-----------------|--------------------|---------------|-------|---------------|-------------|
| Female          | Caucasian          | Brown         | 20-30 | 5ft4in-5ft8in | 161-200 lbs |
| Other Features: |                    |               |       |               |             |

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

JED MARGOLIN v. OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION, ET AL

Service Documents: THIRD AMENDED CUBPOENA DUCES TECUM; WITNESS FEE \$25.00

CASE#: 090C00579 1B

Service Comments:

Standard Service

\$37.00

**TOTAL CHARGES:**

\$37.00

**BALANCE:**

\$37.00

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH FINANCE CHARGE

5457.01

## Invoice

Bank of America 

Bank Of America  
 Legal Order Processing  
 CA9-705-05-19  
 PO Box 3609  
 Los Angeles, CA 90051  
 213-580-0702

**BILL TO**

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

RECEIVED

DEC 18 2013

WATSON ROUNDS

**Case # :** L111813000262  
**Invoice Id :** Invoice - 296601  
**Date of Invoice :** 12/12/2013  
**Court Case Name :** OPTIMA TECHNOLOGY  
**Court Case # :** 090C00579 1B  
 EIN: 94-1687665

**Amt Paid :**

Please remit top half w/payment to the above address. Please include case number on payment.

**Invoice Details**

| Quantity | Description of services/Financial Records Provided | Cost Per Item | Extended Amount |
|----------|--|---------------|-----------------|
| 31       | Copies of Checks                                   | 0.25          | \$7.75          |
| 255      | Copies of Statements Pages                         | 0.25          | \$63.75         |
| 16       | Copies of Documents                                | 0.25          | \$4.00          |
| 41       | Copies of Deposits                                 | 0.25          | \$10.25         |
| 45       | Copies of Offset                                   | 0.25          | \$11.25         |
| 0        | Copies of Account Records and Loan Documents       | 0.25          | \$0.00          |
| 0        | Copies of Complete Loan Files                      | 30.00         | \$0.00          |
| 0.00     | Supervisor Time                                    | 0.00          | \$0.00          |
| 1.77     | Generalist Time                                    | 20.00         | \$35.40         |
| 0.00     | Witness Hours Amount                               | 0.00          | \$0.00          |
| 0.00     | Mileage Amount                                     | 0.00          | \$0.00          |
|          | Postage Amount                                     |               | \$8.26          |
|          | Media Cost   |               | \$0.00          |
|          | Other  |               | \$0.00          |
|          | <b>Sub Total</b>                                   |               | <b>\$140.66</b> |
|          | <b>Less Deposits/Payments Received</b>             |               | <b>\$25.00</b>  |
|          | <b>Refund</b>                                      |               | <b>\$0.00</b>   |
|          | <b>Amount due on Receipt</b>                       |               | <b>\$115.66</b> |

Invoice Remarks:

reno/Carson Messenger Service, Inc.  
 185 Martin Street  
 Reno, NV 89509  
 tel 775.322.2424 fax 775.322.3408  
 process@renocarson.com  
 Federal Tax ID: 88-0306306  
 NV STATE LIC#322



Process Server - Messenger Service  
**RENO / CARSON / LAS VEGAS**  
 ★ ★ ★ WE MAKE DEADLINES ★ ★ ★

Invoice #: 42498  
 Date: 01/10/2014



**INVOICE FOR SERVICE:**

**Amount Due: \$16.00**

**WATSON ROUNDS**  
 5371 KIETZKE LN,  
 RENO, NV 89511

Phone number: 775 324-4100  
 Fax number: 775 333-8171  
 Email Address:

Requestor: NANCY  
 Your File# 5457.01

Service #43376: COURIER/MESSENGER JOB  
 Manner of Service: MESSENGER  
 Service Instructions: P/U (WILL CALL WHEN READY, CLOSE TO 4PM) - FILE  
 IN 1ST JUD TODAY

RECEIVED  
 JAN 19 2014  
 WATSON ROUNDS

Completion Information/Recieved by:C. COOPER  
 Service Date/Time:01/09/2014 3:35 PM  
 Service address:FILE IN 1ST JUD TODAY CARSON CITYNV  
 Served by:JOHN LEE R-004475

| Sex             | Color of skin/race | Color of hair | Age | Height | Weight |
|-----------------|--------------------|---------------|-----|--------|--------|
| N/A             | N/A                | N/A           |     | N/A    | N/A    |
| Other Features: |                    |               |     |        |        |

Service Documents:  
 Service Comments:

CASE#:

MESSENGER

\$16.00

**TOTAL CHARGES:**

\$16.00

**BALANCE:**

\$16.00

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH  
 FINANCE CHARGE

Carson Messenger Service, Inc.  
65 Martin Street  
Reno, NV 89509  
tel 775.322.2424 fax 775.322.3408  
process@renocarson.com  
Federal Tax ID: 88-0306306  
NV STATE LIC#322



Process Server - Messenger Service  
**RENO / CARSON / LAS VEGAS**  
\*\*\* WE MAKE DEADLINES \*\*\*

Invoice #: 43629  
Date: 01/29/2014



**INVOICE FOR SERVICE:**

**Amount Due: \$95.00**

WATSON ROUNDS  
5371 KIETZKE LN,  
RENO, NV 89511

Phone number: 775 324-4100  
Fax number: 775 333-8171  
Email Address:

Requestor: NANCY  
Your File# 5457.01

Service #44406: WELLS FARGO BANK, N.A.  
Manner of Service: CORPORATE

Completion Information/Recieved by:FRANCES GUTIERREZ

Service Date/Time:01/28/2014 2:45 PM

Service address:2215-B RENAISSANCE DR CSC SERVICES OF NEVADA, INC. Las VegasNV  
89119

Served by:ROGER PAYNE R-038800

| Sex             | Color of skin/race | Color of hair | Age    | Height | Weight   |
|-----------------|--------------------|---------------|--------|--------|----------|
| Female          | Hispanic           | N/A           | 25 YOA | 5'6"   | 120 LBS. |
| Other Features: |                    |               |        |        |          |

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

JED MARGOLIN v. OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION, ET AL

Service Documents: SUBPOENA DUCES TECUM; WITNESS FEE \$25.00

CASE#: 090C00579 1B

Service Comments:

|                       |              |                |
|-----------------------|--------------|----------------|
| Forwarding Fees       |              | \$55.00        |
| CASH ADVANCE          | WITNESS FEES | \$25.00        |
| RUSH                  |              | \$15.00        |
| <b>TOTAL CHARGES:</b> |              | <b>\$95.00</b> |
| <b>BALANCE:</b>       |              | <b>\$95.00</b> |

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH  
FINANCE CHARGE



3457.01

Invoice #: 45499  
Date: 03/17/2014

o/Carson Messenger Service, Inc.  
55 Martin Street  
Reno, NV 89509  
tel 775.322.2424 fax 775.322.3408  
process@renocarson.com  
Federal Tax ID: 88-0306306  
NV STATE LIC#322



Process Server - Messenger Service  
**RENO / CARSON / LAS VEGAS**  
\*\*\* WE MAKE DEADLINES \*\*\*



**INVOICE FOR SERVICE:**

**Amount Due: \$40.00**

WATSON ROUNDS  
5371 KIETZKE LN,  
RENO, NV 89511

Phone number: 775 324-4100  
Fax number: 775 333-8171  
Email Address:

Requestor: NANCY  
Your File# 545701

Service #46410: COURIER/MESSENGER JOB  
Manner of Service: MESSENGER  
Service Instructions: P/U FILE IN 1ST JUD TODAY

RECEIVED

MAR 17 2014

Completion Information/Recieved by:FILED  
Service Date/Time:03/13/2014 3:45 PM  
Service address:FILE IN 1ST JUD TODAY CARSON CITYNV  
Served by:JOHN LEE R-004475

| Sex             | Color of skin/race | Color of hair | Age | Height | Weight |
|-----------------|--------------------|---------------|-----|--------|--------|
| N/A             | N/A                | N/A           |     | N/A    | N/A    |
| Other Features: |                    |               |     |        |        |

Service Documents:

CASE#:

Service Comments:

MESSENGER

\$40.00

**TOTAL CHARGES:**

**\$40.00**

**BALANCE:**

**\$40.00**

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH  
FINANCE CHARGE

Reno/Carson Messenger Service, Inc.  
 185 Martin Street  
 Reno, NV 89509  
 tel 775.322.2424 fax 775.322.3408  
 process@renocarson.com  
 Federal Tax ID: 88-0306306  
 NV STATE LIC#322



Process Server - Messenger Service  
**RENO / CARSON / LAS VEGAS**  
 ★ ★ ★ WE MAKE DEADLINES ★ ★ ★

Invoice #: 46398  
 Date: 04/04/2014



**INVOICE FOR SERVICE:**

**Amount Due: \$65.00**

WATSON ROUNDS  
 5371 KIETZKE LN,  
 RENO, NV 89511

Phone number: 775 324-4100  
 Fax number: 775 333-8171  
 Email Address:

Requestor: NANCY  
 Your File# 5457.01

Service #47401: COURIER/MESSENGER JOB  
 Manner of Service: MESSENGER  
 Service Instructions: DELIVER TO: DAVID WESICK. OVER THE COUNTER  
 TO THE POST MASTER.

RECEIVED

APR - 4 2014

WATSON ROUNDS

Completion Information/Received by: DIANNA GARCIA  
 Service Date/Time: 04/03/2014 1:49 PM  
 Service address: P.O. BOX 568 GLENBROOK NV 89413  
 Served by: LARRY SCOTT R-053852

| Sex             | Color of skin/race | Color of hair | Age | Height | Weight |
|-----------------|--------------------|---------------|-----|--------|--------|
| N/A             | N/A                | N/A           |     | N/A    | N/A    |
| Other Features: |                    |               |     |        |        |

Service Documents:

CASE#:

Service Comments: Postal Clerk

|                       |                |
|-----------------------|----------------|
| MESSENGER             | \$25.00        |
| SPECIAL MILEAGE       | \$40.00        |
| <b>TOTAL CHARGES:</b> | <b>\$65.00</b> |
| <b>BALANCE:</b>       | <b>\$65.00</b> |

CREDIT TERMS ARE NET 30. INVOICES NOT PAID WITHIN TERMS WILL BE ASSESSED A 1.5% PER MONTH FINANCE CHARGE

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 APR 30 PM 4:55  
ALAN GLOVER  
*Alan Glover*  
DEPUTY

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

8 JED MARGOLIN, an individual,  
9  
Plaintiff,  
10 vs.  
11 OPTIMA TECHNOLOGY CORPORATION,  
a California corporation, OPTIMA  
12 TECHNOLOGY CORPORATION, a Nevada  
corporation, REZA ZANDIAN aka  
13 GOLAMREZA ZANDIANJAZI aka  
GHOLAM REZA ZANDIAN aka REZA JAZI  
14 aka J. REZA JAZI aka G. REZA JAZI aka  
GHONOREZA ZANDIAN JAZI, an  
15 individual, DOE Companies 1-10, DOE  
Corporations 11-20, and DOE Individuals 21-  
16 30,  
17  
Defendants.

Case No. 09OC00579 1B  
Dept. No. I

18  
19 **DEFENDANTS' MOTION TO RETAX AND SETTLE COSTS**

20 COMES NOW, Defendant REZA ZANDIAN ("ZANDIAN"), by and through his  
21 attorneys, Kaempfer Crowell, and hereby files his Motion to Retax and Settle Costs relative to  
22 Plaintiff's *Motion For Order Allowing Costs And Necessary Disbursements And Memorandum*  
23 *Of Points And Authorities In Support Thereof.*  
24

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

1 This *Motion* is made pursuant to the attached memorandum of points and authorities, all  
2 papers and pleadings on file in this matter and any evidence received and arguments entertained  
3 by the Court at any hearing.

4 DATED this 30 day of April, 2014.

5 **KAEMPFER CROWELL**

6  #1027

7 \_\_\_\_\_  
8 Jason D. Woodbury  
9 Nevada Bar No. 6870  
10 510 West Fourth Street  
11 Carson City, Nevada 89703  
12 Telephone: (775) 884-8300  
13 Facsimile: (775) 882-0257  
14 [JWoodbury@kcnvlaw.com](mailto:JWoodbury@kcnvlaw.com)  
15 *Attorneys for Reza Zandian*

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **A. THE COURT HAS DISCRETION TO AWARD COSTS AND EACH PARTY**  
3 **SHOULD BEAR THEIR OWN COSTS IN THIS CASE**

4 The determination of allowable costs is within the sound discretion of the trial court.  
5 *Bobby Berosini, Ltd. v. People for the Ethical Treatment of Animals*, 971 P.2d 383, 114 Nev.  
6 1348 (1998). However, statutes permitting recovery of costs are in derogation of common law,  
7 and therefore must be strictly construed. *Gibellini v. Klindt*, 110 Nev. 1201, 885 P.2d 540, 1994  
8 Nev. LEXIS 143 (1994). Nev. Rev. Stat. Ann. § 18.005.

9 Here, while Defendant believes each party should bear its own costs, Plaintiff seeks its  
10 photocopying costs at a rate of \$0.25 per page, per supporting documentation at “Exhibit 4” of  
11 “Declaration of Adam McMillen In Support of Plaintiff’s Motion for Order Allowing Costs and  
12 Necessary Disbursements” NRS 18.005(12) prescribes “Reasonable costs for photocopies.” If  
13 the court is inclined to award costs, the Defendant respectfully requests the court reduce the  
14 photocopy charges to \$0.15 per page, or a total of \$288.72 for photocopies. *See Affidavit of Jano*  
15 *Barnhurst*, attached hereto as Exhibit 1.

16 **B. AN AWARD OF ATTORNEY’S FEES IS NOT APPROPRIATE AS A**  
17 **MATTER OF LAW**

18 It is well settled law in Nevada that the district court may not award attorney fees absent  
19 authority under a statute, rule, or contract. Here there is no applicable statute or rule and the  
20 parties did not enter into an agreement which afforded attorney’s fees. Therefore, the American  
21 Rule that each party should bear its own attorney’s fees and costs applies, in keeping with the  
22 following law.

23 **1. NRS 598.0999(2) does not permit an award of attorney’s fees in this case**

24 Plaintiff claims that under its claim for “deceptive trade practices” it is entitled to an

1 award of attorney's fees under "NRS 598.0999(2)." See Plaintiff's Motion For Order Allowing  
2 Costs And Necessary Disbursements And Memorandum Of Points And Authorities In Support  
3 Thereof at p. 3, ll. 24-28. While Plaintiff concedes that "NRS 598.0999(2) does not explicitly  
4 provide for attorney fees incurred postjudgment," Plaintiff nonetheless seeks them under the  
5 authority of NRS 598.0999(2).

6 However, NRS 598.0999 does not permit an award of attorney's fees in this case. It  
7 provides in relevant part:

8 *NRS 598.0999 Civil and criminal penalties for violations.*

9 2. Except as otherwise provided in NRS 598.0974, in any action brought pursuant  
10 to the provisions of NRS 598.0903 to 598.0999, inclusive, if the court finds that a person  
11 has willfully engaged in a deceptive trade practice, the district attorney of any county in  
12 this State or the Attorney General bringing the action may recover a civil penalty not to  
13 exceed \$5,000 for each violation. The court in any such action may, in addition to any  
14 other relief or reimbursement, award reasonable attorney's fees and costs.

15 Here, "in any such action" refers to the potential action to be brought by the district  
16 attorney or the Attorney General in pursuing its civil recourse. It does not refer to an action  
17 brought by a Plaintiff in a civil action. Therefore, NRS 598.0999(2) does not apply.

18 **2. The district court may not award attorney fees absent authority under a statute,  
19 rule, or contract.**

20 It is well settled Nevada law that attorney's fees are not recoverable unless authorized by  
21 a statute, rule, or contractual provision. *Horgan v. Felton*, 123 Nev. 577, 583 (Nev. 2007) citing  
22 *Rowland v. Lepire*, 99 Nev. 308, 315, 662 P.2d 1332, 1336 (1983).

23 Here, the American Rule that each party should bear its own attorney's fees and costs  
24 remains the case, in the absence of a statute, rule or contract to the contrary. Under the  
"American Rule," win or lose, the parties bear their own legal fees. *Fox v. Vice*, 131 S. Ct. 2205,  
2213 (2011). The district court may not award attorney fees absent authority under a statute, rule,

1 or contract. *State, Dep't of Human Resources v. Fowler*, 109 Nev. 782, 784, 858 P.2d 375, 376  
2 (1993).

3  
4 **3. The court's exercise of discretion in determining the reasonable value of an  
attorney's services arises only when an award of attorney's fees is prescribed.**

5 While it is within the court's discretion to determine the reasonable amount of attorney's  
6 fees under a statute or rule, in exercising its discretion, the court must evaluate the factors set  
7 forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345 (1969). Here, the court does not  
8 arrive at such an analysis because there is no applicable statute or rule which permits an award of  
9 fees to the Plaintiff. The *Brunzell* analysis only arises in instances where attorney's fees are  
10 prescribed by statute, rule or contract.

11  
12 **4. Even if a *Brunzell* Analysis of an award of attorney's fees were permissible,  
Plaintiff's fees are inflated.**

13 This case has been a series of default judgments and did not require years of legal work  
14 focused on a specialty in intellectual property. While that may, in general, justify opposing  
15 counsel's billable hourly rate, this was not a case driven by intellectual property law. Rather, by  
16 application of the default judgment scheme, NRS Chapter 17. Further, the Complaint reflects  
17 this fact: it offers up the run of the mill torts against Defendants and only alleges "deceptive  
18 trade practices," as the one and only "intellectual property" specialty. Further, not one of the  
19 Plaintiff's claims was ever never litigated and brought to a judgment on the merits. In fact, the  
20 fees Plaintiff seeks to recover are related solely to post-judgment work that has been performed –  
21 not work that was performed to bring about the default judgment.

22 The judgment against this Defendant is exclusively by default and therefore, does not  
23 impose specialized skill or unusual time and attention to the work performed by counsel in this  
24 case. Plaintiff pursued and has only pursued default judgments against all Defendants since the

1 matter's inception. Hence, this case required no specialized legal practice which justifies the  
2 hourly rate or justifies collection of an increased fee, if any at all.

3 The *Brunzell* factors evaluate: (1) the qualities of the advocate: his ability, his training,  
4 education, experience, professional standing and skill; (2) the character of the work to be done:  
5 its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and  
6 the prominence and character of the parties where they affect the importance of the litigation; (3)  
7 the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the  
8 result: whether the attorney was successful and what benefits were derived. *Brunzell v. Golden*  
9 *Gate Nat'l Bank*, 85 Nev. 345, 349 (Nev. 1969). As set forth above, no factor weighs in favor of  
10 an award of \$34,632.50 for 6 months of work dedicated to opposing the setting aside a default  
11 judgment, taking steps to execute against a default judgment, and responding to an appeal  
12 (10/18/2013 – 4/18/2014).

13  
14 **5. Even if a *Brunzell* Analysis of an award of attorney's fees were permissible,  
15 Plaintiff's requested fees are exclusively for post-judgment, pre-appeal work.**

16 Additionally, Plaintiff is asking that the *Brunzell* factors be applied exclusively to post-  
17 judgment accrued attorney's fees. The default judgment was obtained on June 24, 2013 and  
18 Plaintiff is asking for its attorney's fees from "October 18, 2013 to April 18, 2014." See p. 5, ll.  
19 22-23 of Plaintiff's Motion. The *Brunzell* factors are therefore, generally not applicable (if at all  
20 in this case) to the effort expended in defeating Defendants' "Motion To Set Aside Default  
21 Judgment" filed on January 9, 2014, as fees may not be awarded for work performed related to  
22 the appeal noticed by Defendant on March 12, 2014.

23 To the extent that the attorney's fees are applied to post-appeal work by Plaintiff's  
24 counsel, an award of attorney's fees is prohibited in this case, as well. "There is no provision in  
the statutes authorizing the district court to award attorney fees incurred on appeal. NRAP 38(b)



1 authorizes only this court [the Nevada Supreme Court] to make such an award if it determines  
2 that the appeals process has been misused.” *Board of Gallery of History, Inc. v. Datecs Corp.*,  
3 116 Nev. 286, 288; 994 P. 2d 1149, 1150 (2000).

4  
5 **C. POST-JUDGMENT INTEREST SHOULD NOT COME DUE BY THIS  
6 PREMATURE REQUEST**

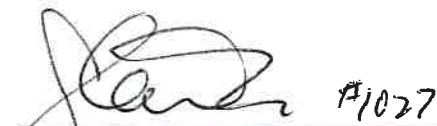
7 The postjudgment interest is accounted for in the Court’s 6/24/2013 Default Judgment  
8 “until satisfied.” And, the interest that Plaintiff alleges is due cannot be advanced via the  
9 Motion. Further, the matter is on appeal as of March 14, 2014.

10 **D. CONCLUSION**

11 For all the reasons set forth herein, it is respectfully requested that this Court GRANT  
12 Defendants’ *Motion to Retax and Settle Costs* and DENY Plaintiff’s *Motion For Order Allowing*  
13 *Costs And Necessary Disbursements And Memorandum Of Points And Authorities In Support*  
14 *Thereof.*

15 DATED this 30<sup>th</sup> day of April, 2014.

16 **KAEMPFER CROWELL**

17  #1027


18 Jason D. Woodbury  
19 Nevada Bar No. 6870  
20 510 West Fourth Street  
21 Carson City, Nevada 89703  
22 Telephone: (775) 884-8300  
23 Facsimile: (775) 882-0257  
24 JWoodbury@kcnvlaw.com  
*Attorneys for Reza Zandian*

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCP 5(b), I hereby certify that service of the foregoing **DEFENDANTS'**  
3 **MOTION TO RETAX AND SETTLE COSTS** was made this date by depositing a true copy  
4 of the same for mailing at Carson City, Nevada, 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 30 day of April, 2014.

11   
12 an employee of Kaempfer Crowell

# 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](mailto:JWoodbury@kcnvlaw.com)  
5 **Attorneys for Reza Zandian**

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

8 JED MARGOLIN, an individual,

Case No. 09OC00579 1B

9 Plaintiff,

Dept. No. I

10 vs.

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

16 Defendants.  
17

18 **AFFIDAVIT OF JANO BARNHURST**  
19 **IN SUPPORT OF MOTION TO RETAX AND SETTLE COSTS**


20 STATE OF NEVADA )  
) ss.  
21 CARSON CITY )

22 I, Jano Barnhurst, being first duly sworn under penalty of perjury, depose and  
23 state as follows:

- 24 1. I am an employee with the law firm of Kaempfer Crowell.



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 MAY 12 PM 3:51  
ALAN GLOVER  
CLERK  
BY  AFFIITY

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

13 JED MARGOLIN, an individual,  
14 Plaintiff,

15 vs.

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

27 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**REPLY IN SUPPORT OF MOTION  
FOR ORDER ALLOWING COSTS  
AND NECESSARY  
DISBURSEMENTS AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT  
THEREOF**

28 **I. Postjudgment Costs**

Zandian does not dispute Margolin is allowed postjudgment costs under NRS 18.160 and NRS 18.170. Zandian only requests that the Court reduce the photocopy charges from \$0.25 to \$0.15 per page.<sup>1</sup> See Defendants' Motion to Retax and Settle Costs ("Opposition"),

<sup>1</sup> Zandian does not dispute the Research, Witness Fees (Subpoenas) or Process service/courier fees.

1 filed 4/30/14, 3:4-15. Zandian looks to the “FedEx Office” in Carson City to demonstrate that  
2 the rate of \$0.25 per page is too high. *Id.* (citing Affidavit of Jano Barnhurst). Zandian’s  
3 counsel fails to mention what it charges for copies. Also, the FedEx Office is not a law firm  
4 and is not a proper example for determining the reasonableness of copy charges in a civil  
5 lawsuit.

6 The First Judicial District Court’s own Fee Schedule, which shows the Court charges  
7 \$0.50 per page for copies, is a better exemplar of what reasonable copy charges should be in  
8 this matter. *See* Declaration of Adam McMillen in Support of Reply (“McMillen Decl.”),  
9 dated 5/12/14, Exhibit 1, filed herewith. The rate of \$0.25 per page is half of what the Court  
10 charges for legal copies and is reasonable under the circumstances. Therefore, Margolin’s  
11 copy charges should not be reduced and should be awarded in full.

## 13 II. Postjudgment Attorney’s Fees

14 Zandian believes “there is no applicable statute or rule and the parties did not enter into  
15 an agreement which afforded attorney’s fees.” *See* Opposition at 3:18-22. However, as  
16 demonstrated in the Motion for Order Allowing Costs and Necessary Disbursements, Margolin  
17 should be awarded his postjudgment fees pursuant to the Deceptive Trade Practices statute.  
18

### 19 a. NRS 598.0999(2) does allow an award of attorney’s fees

20 NRS 598.0999(2) states as follows:

21 Except as otherwise provided in NRS 598.0974, **in any action brought**  
22 **pursuant to the provisions of NRS 598.0903 to 598.0999**, inclusive, if the  
23 court finds that a person has willfully engaged in a deceptive trade practice, the  
24 district attorney of any county in this State or the Attorney General **bringing**  
25 **the action** may recover a civil penalty not to exceed \$5,000 for each violation.  
The court **in any such action** may, in addition to any other relief or  
reimbursement, award reasonable attorney’s fees and costs.

26 NRS 598.0999(2) (emphasis added).

27 The “provisions of NRS 598.0903 to 598.0999” encompasses the entire Deceptive  
28 Trade Practices statute. The language, “any action brought pursuant to the provisions of NRS

1 598.0903 to 598.0999,” does not limit Deceptive Trade Practices actions to district attorneys  
2 or the Attorney General. *See also Betsinger v. DR Horton, Inc.*, 232 P. 3d 433 (Nev. 2010) (an  
3 example of a Deceptive Trade Practices action not brought by district attorney or Attorney  
4 General). The only limitation in NRS 598.0999(2) relates to the district attorney’s and the  
5 Attorney General being able to pursue the \$5,000 civil penalty. In contrast, the last sentence  
6 of NRS 598.0999(2) stands alone and does not limit attorney fee awards to district attorneys or  
7 the Attorney General and allows the Court, in any Deceptive Trade Practices action, to “award  
8 reasonable attorney’s fees and costs.” NRS 598.0999(2).  
9

10 Zandian’s argument that NRS 598.0999(2) does not permit an award of attorney’s fees  
11 because it is limited to an action brought by the district attorney or the Attorney General is  
12 clearly erroneous.

13 Since NRS 598.0999(2) does not exclude postjudgment attorney fees, Margolin’s  
14 attorney’s fees should be awarded for having to incur fees enforcing the judgment on the  
15 deceptive trade practices claim. *See Barney v. Mt. Rose Heating & Air Conditioning*, 124  
16 Nev. 821, 825-6, 192 P.3d 730, 733-4 (2008) (mechanic lien statute did not expressly provide  
17 for attorney fees incurred postjudgment, however, statute did not expressly exclude  
18 postjudgment attorney fees from its purview and was liberally interpreted to allow  
19 postjudgment attorney fees “so as to further the lien statutes’ purpose to ensure that contractors  
20 are paid in whole for their work.”); *see also Rosen v. LegacyQuest*, A136985, 2014 WL  
21 1372114 (Cal. Ct. App. Mar. 21, 2014) (judgment creditor, who had recovered statutory  
22 attorney fees in connection with underlying judgment, authorized to recover attorney fees  
23 incurred in enforcing underlying judgment under the statute authorizing recovery of judgment  
24 creditor’s “reasonable and necessary costs of enforcing a judgment,” since the statute  
25 authorizing the underlying attorney fee award established that the fee award was “otherwise  
26 provided by law” within meaning of the fee statute) (an attorney fee award properly includes  
27  
28



1 the reasonable fees incurred in seeking the fees); *see also Ketchum v. Moses* (2001) 24 Cal.4th  
2 1122, 104 Cal.Rptr.2d 377, 17 P.3d 735 (judgment creditor entitled to fees incurred in  
3 enforcing the right to mandatory fees under statute).

4 **b. Margolin's attorneys' fees are reasonable**

5 Without providing any foundation, Zandian claims Margolin's fees are inflated. *See*  
6 *Opposition* at 5:11-6:12. Zandian's only stated basis for this argument is that "[t]his case has  
7 been a series of default judgments and did not require years of legal work focused on a  
8 specialty in intellectually property." *See id.* at 5:13-14.

9  
10 Zandian ignores the fact that this matter is predicated upon Zandian's fraudulent  
11 assignment of Margolin's intellectual property rights. While Zandian purposely avoided  
12 appearing and litigating the claims at issue, the nature of this matter required specialized skill  
13 and required a significant amount of time and attention by the attorneys involved.

14 The patent and deceptive trade practices issues, and the unique facts surrounding them,  
15 involved careful consideration and research. Despite what Defense counsel says, patent and  
16 deceptive trade practices litigation is a niche practice that requires a high degree of legal skill  
17 and care in order to be performed properly and effectively. Each of these causes of action,  
18 coupled with the unique facts of this matter, required thorough research and careful analysis.  
19 Again, undersigned counsel billed at an hourly rate of \$300, which counsel contends is  
20 reasonable for intellectual property litigation.

21  
22 The postjudgment collection efforts have thus far included attempting to find Zandian's  
23 collectible assets, including researching and investigating his property in Nevada and  
24 California and moving for a debtor's examination. Considering Zandian's elusive behavior,  
25 shell games, and elaborate financial arrangements with a multitude of companies and  
26 individuals, Margolin has been forced to incur a significant amount of attorney's fees in  
27 attempting to collect on the judgment. Tellingly, Zandian does not address these postjudgment  
28

1 collection issues in his Opposition.

2 Also, undersigned counsel is charging \$300 per-hour, which is more than reasonable.

3 According to all of the *Brunzell* factors, as outlined in the Motion, Margolin should be  
4 awarded his postjudgment attorney's fees incurred in collecting on the judgment. *See Brunzell*  
5 *v. Golden Gate National Bank*, 455 P.2d 31, 85 Nev. 345 (1969) and *Shuette v. Beazer Homes*  
6 *Holdings Corp.*, 124 P. 3d 530, 121 Nev. 837 (2005).

7 **c. Margolin is entitled to his postjudgment fees not incurred on appeal**

8 Margolin concedes that he is not currently entitled to attorney's fees that are incurred  
9 on appeal. *See Bd. of Gallery of History, Inc. v. Datecs Corp.*, 116 Nev. 286, 288, 994 P.2d  
10 1149, 1150 (2000). However, as stated in the Motion and above, Margolin is entitled to his  
11 postjudgment attorney's fees, including those incurred in executing on the judgment.

12 Therefore, Margolin has revised the fees he is requesting to reflect only those fees that have  
13 been incurred, postjudgment, with regards to execution of the judgment, for a total of  
14 \$31,247.50 in fees. *See* McMillen Decl., ¶¶ 4-5 and Exhibits 2-3.

15 **III. Postjudgment Interest**

16  
17 Zandian argues it is premature for Margolin to request an order stating what the current  
18 amount of accrued postjudgment interest is at this time. *See* Opposition at 6:4-5. Zandian  
19 provides no legal basis for his position. Further, Zandian does not argue that Margolin is not  
20 entitled to postjudgment interest.

21  
22 “The purpose of post-judgment interest is to compensate the plaintiff for loss of the use  
23 of the money awarded in the judgment ‘without regard to the elements of which that judgment  
24 is composed.’” *Albert H. Wohlers & Co. v. Bartgis*, 114 Nev. 1249, 1269, 969 P.2d 949, 963  
25 (1998) (citing *Ainsworth v. Combined Ins. Co.*, 105 Nev. 237, 244, 774 P.2d 1003, 1009  
26 (1989); *see also Waddell v. L.V.R.V. Inc.*, 122 Nev. 15, 26, 125 P.3d 1160, 1167 (2006)  
27 (“[t]he purpose of post-judgment interest is to compensate the plaintiff for loss of the use of  
28

1 the money awarded in the judgment' without regard to the various elements that make up the  
2 judgment.”).

3 Zandian has not provided a supersedeas bond to stop execution of the judgment and  
4 Margolin is entitled to postjudgment interest until the judgment is satisfied. *See* NRC P 62(d)  
5 (by giving a supersedeas bond party may obtain stay of execution); *see also* NRS 17.130(2)  
6 (interest accrues until judgment satisfied). Therefore, because the original judgment was  
7 entered in Nevada and the judgment set the interest rate at the legal rate of interest according  
8 to NRS 17.130, the interest rate is 5.25 percent per-annum, or \$215.15 per-day. Accordingly,  
9 Margolin is owed simple interest at 5.25 percent or \$215.15 per- day from June 27, 2014, the  
10 date of notice of entry of the judgment, through April 18, 2014. It is 296 days from June 27,  
11 2013 to April 18, 2014. Multiplying 296 days by \$215.15 equals \$63,684.40 in accrued  
12 interest.<sup>2</sup>

13  
14 **IV. Conclusion**

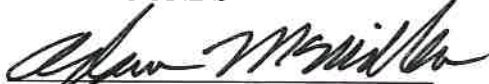
15 Based upon the above, Margolin respectfully requests that the Motion for Order  
16 Allowing Costs and Necessary Disbursements be granted in full.  
17

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

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

21 DATED: May 12, 2014.

WATSON ROUNDS

22 By: 

23 Matthew D. Francis (6978)  
Adam P. McMillen (10678)

24 WATSON ROUNDS  
5371 Kietzke Lane

25 Reno, NV 89511  
Telephone: 775-324-4100

26 Facsimile: 775-333-8171

27 *Attorneys for Plaintiff Jed Margolin*

28  

---

<sup>2</sup> Interest continues to accrue until the judgment is satisfied. *See* NRS 17.130(2).



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 MAY 12 PM 3:51  
ALAN GLOVER  
CLERK  
BY *[Signature]*  
DEPUTY

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

13 JED MARGOLIN, an individual,  
14 Plaintiff,  
15 vs.

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

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

**DECLARATION OF ADAM  
MCMILLEN IN SUPPORT OF REPLY  
IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ORDER ALLOWING  
COSTS AND NECESSARY  
DISBURSEMENTS**

28 I, Adam P. McMillen, do hereby declare and state:

1. I am counsel of record for Plaintiff Jed Margolin in this matter. This declaration is based upon my personal knowledge and is made in support of the Reply in Support of Plaintiff's Motion for Order Allowing Costs and Necessary Disbursements, filed concurrently.

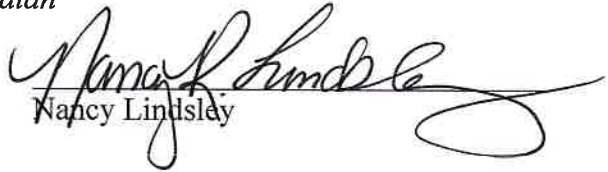


1 **CERTIFICATE OF SERVICE**

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, **DECLARATION OF ADAM MCMILLEN IN**  
5 **SUPPORT OF REPLY IN SPPOT OF PLAINTIFF'S MOTION FOR ORDER**  
6 **ALLOWING COSTS AND NECESSARY DISBURSEMENTS**, addressed as follows:

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

13 Dated: May 12, 2014

14   
15 Nancy Lindsley

**EXHIBIT LIST**

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**EXHIBIT NO.**

**DESCRIPTION**

**PAGE(S)**

|   |   |   |
|---|---|---|
| 1 | First Judicial District Court Fee Schedule                      | 5 |
| 2 | Watson_Rounds Client Fees Listing Oct/18/2013<br>to Apr/18/2014 | 9 |
| 3 | Watson Rounds Client Ledger Costs                               | 3 |



# Exhibit 1

# Exhibit 1

# FIRST JUDICIAL DISTRICT COURT FEE SCHEDULE

## Effective October 1, 2013

**ABSTRACT OF JUDGMENT** \$3.00

NRS 19.013

**ADOPTION** \$233.00

NRS 19.013; NRS 19.020; AB 65; Ct. Security Fee; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS 19.0313 (3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.0315; AB 535

If DCFS or child placing agency licensed by the Division consents to the adoption of a child with special needs per NRS 127.186, there is no fee. Costs, i.e., copies, certs, etc. can be waived by court order per NRS 127.186(8)

n/c

**ANSWERS**

NRS 19.013; AB 65; Ct. Security Fee; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS 19.0313(3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.0335; NRS 125; NRS 19.0315; AB 535

~ ANSWER (DIVORCES/ANNULMENTS) \$207.00

~ ANSWER TO MOTION TO MODIFY FINAL ORDER (DIVORCE) \$25.00

~ ANSWER (BUSINESS MATTERS) (pending local rule) \$1,478.00

~ ANSWER (CIVIL) \$218.00

~ ANSWER (COMPLEX CASES) (pending local rule) \$468.00

~ ANSWER (CONSTRUCTIONAL) \$468.00

For each additional defendant named in an answer when the answer is filed or for each additional party appearing in the action when the additional party appears in the action

\$30.00

**COPIES AND SEARCHES**

NRS 19.013; NRAP Rule 10

~ CERTIFIED COPY (copy from court file - copy charges apply) \$3.00

~ CERTIFIED COPY (when presented by customer) \$5.00

~ COPIES (per page) \$0.50

~ EXEMPLIFIED COPY \$6.00

~ RECORD INDEX SEARCHES (per name/per year) \$0.50

~ RECORD ON APPEAL TO SUPREME COURT - Civil cases only  
charges will apply for copying court file and binder covers

### **COMPLAINTS**

NRS 19.013; NRS 19.020; AB 65; Ct. Security Fee; NRS 19.030; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS 19.0313(3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.033; NRS 19.335; NRS 19.0315, AB 535; NRS 444.605; NRS 40.600 to 40.695, inclusive

|  |            |
|--|------------|
| ~ ANNULMENT  | \$275.00   |
| ~ BUSINESS MATTERS (pending local rule)  | \$1,525.00 |
| ~ CIVIL (Charges apply for add'l plaintiffs. See below.)   | \$265.00   |
| ~ COMPLEX (pending local rule)   | \$515.00   |
| ~ CONSTRUCTIONAL   | \$515.00   |
| For each additional plaintiff named in complaint when complaint is filed or when an amended complaint adds an additional plaintiff | \$30.00    |
| ~ DIVORCE  | \$284.00   |
| ~ DOMESTICATE A FOREIGN DIVORCE DECREE<br>Re: Action therein   | \$284.00   |
| ~ FOREIGN REGISTRY<br>Re: Child custody or support from foreign divorce action   | \$284.00   |
| ~ FOREIGN REGISTRY -<br>Re: Child custody or support from foreign civil action   | \$265.00   |
| ~ SEPARATE MAINTENANCE   | \$265.00   |
| ~ THIRD-PARTY COMPLAINT  | \$210.00   |
| ~ COMPROMISE CLAIM OF MINOR  | n/c        |

### **CONFESSION OF JUDGMENT**

NRS 17.110; NRS 19.0312; CMC 2.35.010

\$33.00

### **CORPORATIONS** - Any document

NRS 19.013

\$20.00

### **ESTATE & GUARDIANSHIP FILINGS**

(Letters Testamentary; Letters of Administration; Set Aside Estate; Guardianship)

NRS 19.013; NRS 19.020; AB 65; Court Security Fee; NRS 19.030; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS.0313(3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.0315; AB 535

Value of Estate:

|                        |          |
|------------------------|----------|
| \$ 0 - \$ 2,500        | n/c      |
| \$ 2,501 - \$ 20,000   | \$180.50 |
| \$ 20,001 - \$ 199,999 | \$279.50 |
| \$ 200,000 and above   | \$532.50 |

~ GUARDIAN AD LITEM (Fee to be paid upon filing of Complaint) n/c

~ LAST WILL & TESTAMENT (To be submitted upon death only) \$5.00

~ OBJECTION OR CROSS-PETITION TO APPOINTMENT \$122.00

~ PETITION TO CONTEST WILL \$122.00

**FORMS**

NRS 19.013

~ DIVORCE PACKETS (Packets can be printed from our website at no charge) \$3.00

**INSURANCE CERTIFICATE**

NRS 19.013

\$15.00

**ISSUANCE OF WRITS**

(Attachment; Garnishment; Execution or any other writ designed to enforce any judgment of the court)

AB 65

\$10.00

**JURY DEMAND** - per party requesting jury (first day jury fees)

NRCP Rule 38; NRS 6.150

\$320.00

**JUSTICE COURT APPEAL**

NRS19.013; NRS 19.020; Ct. Security Fee; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS 19.0313(3); NRS 19.0313(3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.315; AB 535

\$122.00

**JUSTICE COURT TRANSFER**

NRS19.013; NRS 19.020; Ct. Security Fee; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS 19.0313(3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.315; AB 535

\$120.00

**MISCELLANEOUS FILINGS**

(For filings of all papers to be kept by the clerk, not otherwise provided for, other than papers filed in actions and proceedings in court)

NRS 19.013

\$5.00

**MOTION FOR SUMMARY JUDGMENT OR JOINDER THERETO**

AB 65

\$200.00

**MOTION TO CERTIFY/DECERTIFY A CLASS**

AB 65

\$349.00

|  |          |
|--|----------|
| <b><u>MOTION TO MODIFY FINAL ORDER (DIVORCE)</u></b>   | \$25.00  |
| NRS 19.031   |          |
| <b><u>NOTARY BOND</u></b>  | \$20.00  |
| NRS 19.013; NRS 19.016   |          |
| <b><u>NOTICE OF APPEAL</u></b> - (See below for additional fees)   | \$24.00  |
| NRS 19.013; NRAP 7   |          |
| ~ SUPREME COURT FILING FEE - (Payable to Supreme Court; must be submitted with the notice of appeal at time of filing)   | \$250.00 |
| ~ COSTS ON APPEAL BOND   | \$500.00 |
| <b><u>PARENTAL RIGHTS TERMINATION</u></b>  | \$265.00 |
| NRS 128.140; NRS 19.013; NRS 19.020; AB 65; Ct. Security Fee; NRS 19.030; NRS 19.031; NRS 19.0312; CMC 2.35.010; NRS 19.0313(3); CMC 2.36.010; NRS 19.03135; CMC 2.37.010; NRS 19.0315; AB 535 |          |
| <b><u>PEREMPTORY CHALLENGE</u></b> - payable to Supreme Court; must be submitted with document at time of filing   | \$450.00 |
| SCR 48.1; increased 1/12/11  |          |
| <b><u>POWER OF ATTORNEY</u></b>  | \$15.00  |
| NRS 19.013   |          |
| <b><u>REPORT OF ADOPTION - Certification</u></b>   | \$6.00   |
| NRS 19.013; NRS 19.030   |          |
| <b><u>VENUE TRANSFER TO CARSON FROM ANOTHER COUNTY</u></b>   | \$155.00 |
| NRS 19.013; AB 65  |          |

# Exhibit 2

# Exhibit 2

| Date        | Entry # | Fee / Time Explanation  | Hours | Amount | Inv#  | Billing Status |
|-------------|---------|---|-------|--------|-------|----------------|
|             | 5457    | Margolin, Jed   |       |        |       |                |
|             | 5457.01 | Patent theft analysis & litigation  |       |        |       |                |
| Oct 18/2013 | 1115373 | Lawyer: NRL 1.50 Hrs X 125.00<br>Telephone conference with Charles Schwab re password to access CD; access CD-compile information; save to client | 1.50  | 187.50 | 12409 | Billed         |
| Oct 18/2013 | 1115374 | Lawyer: NRL 1.00 Hrs X 125.00<br>Telephone conference with Wells Fargo regarding redactions in documents produced; preparation of Second Amended  | 1.00  | 125.00 | 12409 | Billed         |
| Oct 24/2013 | 1115875 | Lawyer: NRL 0.50 Hrs X 125.00<br>Email to Jed   | 0.50  | 62.50  | 12409 | Billed         |
| Oct 28/2013 | 1116086 | Lawyer: NRL 0.80 Hrs X 125.00<br>Brief conference with Jed  | 0.80  | 100.00 | 12409 | Billed         |
| Oct 28/2013 | 1116091 | Lawyer: NRL 0.20 Hrs X 125.00<br>Review email from MDF  | 0.20  | 25.00  | 12409 | Billed         |
| Oct 28/2013 | 1116101 | Lawyer: APM 0.10 Hrs X 300.00<br>Review letter, dated 10/7/13, from Charles Schwab regarding subpoenaed documents.                                | 0.10  | 30.00  | 12409 | Billed         |
| Oct 29/2013 | 1116297 | Lawyer: NRL 0.50 Hrs X 125.00<br>Telephone conference with Wells Fargo regarding subpoena duces tecum; review previous SDT and response to same;  | 0.50  | 62.50  | 12409 | Billed         |
| Oct 30/2013 | 1116490 | Lawyer: APM 0.20 Hrs X 300.00<br>Communicate with Fred Sadri  | 0.20  | 60.00  | 12409 | Billed         |
| Oct 30/2013 | 1116520 | Lawyer: NRL 1.00 Hrs X 125.00<br>Commence preparation of Analysis of Information from Financial Institutions                                      | 1.00  | 125.00 | 12409 | Billed         |
| Nov 1/2013  | 1116933 | Lawyer: APM 0.10 Hrs X 300.00<br>Received telephone call from Eli Abrishami   | 0.10  | 30.00  | 12455 | Billed         |
| Nov 1/2013  | 1116934 | Lawyer: APM 0.10 Hrs X 300.00<br>Draft email to Eli Abrishami   | 0.10  | 30.00  | 12455 | Billed         |
| Nov 1/2013  | 1116935 | Lawyer: APM 0.10 Hrs X 300.00<br>Review email, dated 11/1/13, from Eli Abrishami  | 0.10  | 30.00  | 12455 | Billed         |
| Nov 4/2013  | 1117495 | Lawyer: APM 0.40 Hrs X 300.00<br>Review 18 pages of detailed Notes by Jed Margolin, dated 10/27/13,   | 0.40  | 120.00 | 12455 | Billed         |
| Nov 8/2013  | 1118457 | Lawyer: APM 0.30 Hrs X 300.00<br>Communicate with Fred Sadri  | 0.30  | 90.00  | 12455 | Billed         |
| Nov 8/2013  | 1118462 | Lawyer: APM 0.20 Hrs X 300.00<br>Review new subpoena to Bank of America.  | 0.20  | 60.00  | 12455 | Billed         |
| Nov 8/2013  | 1118480 | Lawyer: NRL 1.00 Hrs X 125.00<br>Telephone conference with Wells Fargo regarding subpoena; preparation of SDT to Bank of America                  | 1.00  | 125.00 | 12455 | Billed         |
| Nov 13/2013 | 1118849 | Lawyer: NRL 0.50 Hrs X 125.00<br>Finalize BofA SDT for service  | 0.50  | 62.50  | 12455 | Billed         |
| Nov 20/2013 | 1119932 | Lawyer: APM 0.10 Hrs X 300.00<br>Communicate with representative from Bank of America regarding their request for additional information for Zan  | 0.10  | 30.00  | 12455 | Billed         |
| Dec 2/2013  | 1121016 | Lawyer: APM 0.20 Hrs X 300.00<br>Communicate with Fred Sadri  | 0.20  | 60.00  | 12501 | Billed         |
| Dec 2/2013  | 1121017 | Lawyer: APM 0.20 Hrs X 300.00<br>Draft email to Jed Margolin  | 0.20  | 60.00  | 12501 | Billed         |
| Dec 2/2013  | 1121030 | Lawyer: APM 0.20 Hrs X 300.00<br>Communicate with Nancy Lindsley  | 0.20  | 60.00  | 12501 | Billed         |
| Dec 2/2013  | 1121051 | Lawyer: NRL 1.50 Hrs X 125.00<br>Review subpoena responses  | 1.50  | 187.50 | 12501 | Billed         |
| Dec 4/2013  | 1121458 | Lawyer: NRL 0.20 Hrs X 125.00<br>Discuss SDT's with APM;  | 0.20  | 25.00  | 12501 | Billed         |
| Dec 6/2013  | 1121789 | Lawyer: APM 0.30 Hrs X 300.00<br>Review letter, dated 12/6/13, from Geoffrey Hawkins regarding his representation of Zandian.                     | 0.30  | 90.00  | 12501 | Billed         |
| Dec 6/2013  | 1121790 | Lawyer: APM 0.10 Hrs X 300.00<br>Draft email to Jed Margolin  | 0.10  | 30.00  | 12501 | Billed         |
| Dec 6/2013  | 1121792 | Lawyer: APM 0.30 Hrs X 300.00<br>Communicate with Jed Margolin  | 0.30  | 90.00  | 12501 | Billed         |
| Dec 6/2013  | 1121793 | Lawyer: APM 0.40 Hrs X 300.00<br>Communicate with Johnathan Fayeghi regarding   | 0.40  | 120.00 | 12501 | Billed         |
| Dec 6/2013  | 1121794 | Lawyer: APM 0.30 Hrs X 300.00<br>Communicate with Matt Francis  | 0.30  | 90.00  | 12501 | Billed         |
| Dec 6/2013  | 1121795 | Lawyer: APM 0.10 Hrs X 300.00<br>Draft email to Jed Margolin  | 0.10  | 30.00  | 12501 | Billed         |
| Dec 6/2013  | 1121796 | Lawyer: APM 0.10 Hrs X 300.00<br>Review Third Amended Subpoena to Charles Schwab.   | 0.10  | 30.00  | 12501 | Billed         |
| Dec 6/2013  | 1121797 | Lawyer: APM 0.10 Hrs X 300.00<br>Review Subpoena to E-Trade.  | 0.10  | 30.00  | 12501 | Billed         |
| Dec 6/2013  | 1123234 | Lawyer: MDF 0.50 Hrs X 300.00<br>Conference with APM re:  | 0.50  | 150.00 | 12501 | Billed         |
| Dec 9/2013  | 1122027 | Lawyer: APM 0.40 Hrs X 300.00<br>Review email, dated 12/8/13, from Jed Margolin   | 0.40  | 120.00 | 12501 | Billed         |
| Dec 10/2013 | 1122113 | Lawyer: NRL 0.00 Hrs X 125.00   | 0.00  | 0.00   | 12501 | Billed         |
| Dec 10/2013 | 1122191 | Lawyer: APM 2.70 Hrs X 300.00<br>Draft motion for debtor's examination.   | 2.70  | 810.00 | 12501 | Billed         |
| Dec 10/2013 | 1122281 | Lawyer: NRL 0.00 Hrs X 125.00<br>Process for service two (2) Subpoenas Duces Tecum - ETrade and Charles Schwab & Co., Inc.                        | 0.00  | 0.00   | 12501 | Billed         |
| Dec 11/2013 | 1122290 | Lawyer: APM 0.10 Hrs X 300.00<br>Review email, dated 12/10/13, from Jed Margolin  | 0.10  | 30.00  | 12501 | Billed         |
| Dec 11/2013 | 1122291 | Lawyer: APM 0.70 Hrs X 300.00<br>Revise motion for debtor's examination   | 0.70  | 210.00 | 12501 | Billed         |
| Dec 11/2013 | 1122315 | Lawyer: NRL 1.00 Hrs X 125.00<br>Finalize Motion for Judgment Debtor's Examination; compile exhibits and prepare exhibit list; serve all          | 1.00  | 125.00 | 12501 | Billed         |
| Dec 13/2013 | 1123393 | Lawyer: MDF 0.30 Hrs X 300.00<br>Review motion for debtor's examination   | 0.30  | 90.00  | 12501 | Billed         |
| Dec 17/2013 |         | Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00  | 12501 | Billed         |

| Date        | Entry # | Fee / Time<br>Explanation  | Hours | Amount  | Inv#  | Billing<br>Status |
|-------------|---------|--|-------|---------|-------|-------------------|
| Dec 17/2013 | 1123556 | Review email, dated 12/17/13, from Jed Margolin<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12501 | Billed            |
| Dec 17/2013 | 1123557 | Review email, dated 12/17/13, from Donna Johnson<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed            |
| Dec 17/2013 | 1123558 | Draft email to Jed Margolin<br>Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00   | 12501 | Billed            |
| Dec 17/2013 | 1123559 | Draft email to Donna Johnson<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed            |
| Dec 18/2013 | 1123568 | Review and respond to email, dated 12/17/13, from Donna Johnson<br>Lawyer: NRL 1.50 Hrs X 125.00   | 1.50  | 187.50  | 12501 | Billed            |
| Dec 18/2013 | 1123752 | Scan documents received from Wells Fargo and Bank of America<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed            |
| Dec 19/2013 | 1125569 | Review and respond to email, dated 12/18/13, from Donna Johnson<br>Lawyer: NRL 1.50 Hrs X 125.00   | 1.50  | 187.50  | 12501 | Billed            |
| Dec 19/2013 | 1123884 | Continued scanning of financial documents; compare scanned to original for reference; burn to DVD/CD for client<br>Lawyer: APM 0.20 Hrs X 300.00 | 0.20  | 60.00   | 12501 | Billed            |
| Dec 19/2013 | 1123893 | Communicate with Donna Johnson<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed            |
| Dec 19/2013 | 1123894 | Review email, dated 12/19/13, from Donna Johnson<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed            |
| Dec 19/2013 | 1123895 | Draft email to Jed Margolin<br>Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00  | 12501 | Billed            |
| Dec 30/2013 | 1124315 | Review Zandian's motion to set aside default judgment, dated 12/19/13.<br>Lawyer: APM 0.60 Hrs X 300.00  | 0.60  | 180.00  | 12501 | Billed            |
| Dec 30/2013 | 1124392 | Review Westlaw people map report of Zandian<br>Lawyer: APM 0.90 Hrs X 300.00   | 0.90  | 270.00  | 12501 | Billed            |
| Dec 30/2013 | 1124393 | Begin review of Wells Fargo documents.<br>Lawyer: APM 0.30 Hrs X 300.00  | 0.30  | 90.00   | 12501 | Billed            |
| Dec 30/2013 | 1124394 | Begin review of Bank of America documents.<br>Lawyer: APM 1.10 Hrs X 300.00  | 1.10  | 330.00  | 12501 | Billed            |
| Dec 31/2013 | 1124477 | Finish review of Zandian's motion to set aside.<br>Lawyer: APM 0.50 Hrs X 300.00   | 0.50  | 150.00  | 12501 | Billed            |
| Dec 31/2013 | 1124478 | Finish review of Zandian's people map from Westlaw<br>Lawyer: APM 0.30 Hrs X 300.00  | 0.30  | 90.00   | 12501 | Billed            |
| Dec 31/2013 | 1124485 | Review detailed email, dated 12/22/13, from Jed Margolin<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12501 | Billed            |
| Dec 31/2013 | 1124486 | Draft email to Jed Margolin<br>Lawyer: NRL 1.00 Hrs X 125.00   | 1.00  | 125.00  | 12501 | Billed            |
| Jan 2/2014  | 1124499 | Initial review records from Charles Schwab; scan to file<br>Lawyer: MDF 0.50 Hrs X 300.00  | 0.50  | 150.00  | 12547 | Billed            |
| Jan 3/2014  | 1124989 | Review motion to stay proceedings<br>Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00  | 12547 | Billed            |
| Jan 6/2014  | 1125010 | Review and respond to detailed email, dated 1/3/14, from Jed Margolin<br>Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00  | 12547 | Billed            |
| Jan 6/2014  | 1125168 | Review email, dated 1/6/14, and attachments, from Jed Margolin<br>Lawyer: APM 0.10 Hrs X 300.00  | 0.10  | 30.00   | 12547 | Billed            |
| Jan 8/2014  | 1125169 | Draft email to Jed Margolin<br>Lawyer: APM 3.60 Hrs X 300.00   | 3.60  | 1080.00 | 12547 | Billed            |
| Jan 9/2014  | 1125435 | Draft opposition to motion to set aside.<br>Lawyer: NRL 2.00 Hrs X 125.00  | 2.00  | 250.00  | 12547 | Billed            |
| Jan 9/2014  | 1125661 | Review/proof Opposition to Motion to Set Aside Judgment; compile exhibits; arrange for filing and delivery to c<br>Lawyer: APM 4.90 Hrs X 300.00 | 4.90  | 1470.00 | 12547 | Billed            |
| Jan 9/2014  | 1125668 | Finish drafting opposition to motion to set aside default judgment.<br>Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00  | 12547 | Billed            |
| Jan 9/2014  | 1125669 | Revise proposed order on motion for debtor's examination.<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12547 | Billed            |
| Jan 9/2014  | 1125679 | Review email, dated 1/8/14, from Jed Margolin<br>Lawyer: MDF 0.50 Hrs X 300.00   | 0.50  | 150.00  | 12547 | Billed            |
| Jan 13/2014 | 1125888 | Review opposition to motion to set aside.<br>Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00   | 12547 | Billed            |
| Jan 14/2014 | 1126575 | Communicate with Judge Russell's assistant regarding debtor's examination on 2/11/14 at 9:00 a.m.<br>Lawyer: APM 0.10 Hrs X 300.00               | 0.10  | 30.00   | 12547 | Billed            |
| Jan 14/2014 | 1126679 | Communicate with Angela, Judge Russell's assistant, regarding debtor's examination.<br>Lawyer: APM 0.30 Hrs X 300.00                             | 0.30  | 90.00   | 12547 | Billed            |
| Jan 14/2014 | 1126680 | Begin preparing for debtor's examination.<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12547 | Billed            |
| Jan 14/2014 | 1126692 | Draft email to Jed Margolin<br>Lawyer: NRL 0.50 Hrs X 125.00   | 0.50  | 62.50   | 12547 | Billed            |
| Jan 14/2014 | 1126704 | Telephone conference with staff from opposing counsel requesting transmittal of Opposition to Motion to Set Asi<br>Lawyer: MDF 0.30 Hrs X 300.00 | 0.30  | 90.00   | 12547 | Billed            |
| Jan 16/2014 | 1127397 | Conference with APM<br>Lawyer: APM 2.50 Hrs X 300.00   | 2.50  | 750.00  | 12547 | Billed            |
| Jan 16/2014 | 1126936 | Draft opposition to Zandian's motion to stay proceedings.<br>Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00   | 12547 | Billed            |
| Jan 16/2014 | 1126939 | Review order granting motion for debtor examination, dated 1/13/14.<br>Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00   | 12547 | Billed            |
| Jan 16/2014 | 1126941 | Review notice of entry of order for debtor's examination.<br>Lawyer: NRL 1.50 Hrs X 125.00   | 1.50  | 187.50  | 12547 | Billed            |
| Jan 16/2014 | 1126950 | Review Opposition to Motion for Stay to Enforce Judgment; and Order Granting Plaintiff's Motion for Debtor Exam<br>Lawyer: NRL 0.20 Hrs X 125.00 | 0.20  | 25.00   | 12547 | Billed            |
| Jan 16/2014 | 1126953 | Preparation of memo of telephone conference with client<br>Lawyer: MDF 1.20 Hrs X 300.00   | 1.20  | 360.00  | 12547 | Billed            |
| Jan 16/2014 | 1127386 | Review and revise opposition to motion to stay proceedings/<br>Review order granting   |       |         |       |                   |



| Date        | Fee / Time   | Working Lawyer           | Hours | Amount  | Inv#  | Billing Status |
|-------------|--|--------------------------|-------|---------|-------|----------------|
| Entry #     | Explanation  |                          |       |         |       |                |
| Jan 17/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12547 | Billed         |
| 1126979     | Communicate with Nancy Lindsley  |                          |       |         |       |                |
| Jan 17/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12547 | Billed         |
| 1126985     | Review memo from Nancy Lindsley, dated 1/17/14,  |                          |       |         |       |                |
| Jan 17/2014 | Lawyer: NRL 1.00 Hrs X 125.00  | NRL - Nancy R. Lindsley  | 1.00  | 125.00  | 12547 | Billed         |
| 1127035     | Review Wells Fargo documents in anticipation of preparation of SDT for deposit detail; telephone conference with |                          |       |         |       |                |
| Jan 23/2014 | Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen   | 0.30  | 90.00   | 12547 | Billed         |
| 1127509     | Continue drafting questions for debtor's examination of Zandian.   |                          |       |         |       |                |
| Jan 23/2014 | Lawyer: APM 0.90 Hrs X 300.00  | APM - Adam P. McMillen   | 0.90  | 270.00  | 12547 | Billed         |
| 1127516     | Review and respond to email, dated 1/23/14, from Jed Margolin  |                          |       |         |       |                |
| Jan 23/2014 | Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen   | 0.30  | 90.00   | 12547 | Billed         |
| 1127519     | Research process of service on E*Trade as they have not responded to subpoena and they do not have any branches  |                          |       |         |       |                |
| Jan 23/2014 | Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen   | 0.20  | 60.00   | 12547 | Billed         |
| 1127524     | Begin review Zandian's reply in support of motion to set aside default, dated 1/21/14.                           |                          |       |         |       |                |
| Jan 23/2014 | Lawyer: MDF 0.50 Hrs X 300.00  | MDF - Matthew D. Francis | 0.50  | 150.00  | 12547 | Billed         |
| 1127628     | Review reply in support of motion to set aside default judgment and affidavit in support thereof/Review request  |                          |       |         |       |                |
| Jan 28/2014 | Lawyer: NRL 1.00 Hrs X 125.00  | NRL - Nancy R. Lindsley  | 1.00  | 125.00  | 12547 | Billed         |
| 1127844     | Review Federal Express from E*Trade Financial; duplicate for client; save to file                                |                          |       |         |       |                |
| Jan 29/2014 | Lawyer: NRL 1.00 Hrs X 125.00  | NRL - Nancy R. Lindsley  | 1.00  | 125.00  | 12547 | Billed         |
| 1127944     | Preparation of email to client   |                          |       |         |       |                |
| Jan 31/2014 | Lawyer: MDF 0.30 Hrs X 300.00  | MDF - Matthew D. Francis | 0.30  | 90.00   | 12547 | Billed         |
| 1128477     | Draft and review e-mails to and from law clerk and client, et al. re: order denying motion to set aside          |                          |       |         |       |                |
| Jan 31/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12547 | Billed         |
| 1129051     | Review email, dated 1/31/14, from Samantha Valerius, judge's law clerk, regarding request for proposed order.    |                          |       |         |       |                |
| Feb 1/2014  | Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen   | 0.20  | 60.00   | 12624 | Billed         |
| 1129052     | Review and respond to email, dated 2/1/14, from Jed Margolin   |                          |       |         |       |                |
| Feb 3/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1128543     | Review voicemail from Fred Sadri   |                          |       |         |       |                |
| Feb 4/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1128895     | Begin drafting order denying motion to set aside.  |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129034     | Review email, dated 2/5/14, from Jed Margolin  |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129035     | Draft email to Jed Margolin  |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129036     | Review another email from Jed Margolin   |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: APM 3.70 Hrs X 300.00  | APM - Adam P. McMillen   | 3.70  | 1110.00 | 12624 | Billed         |
| 1129038     | Draft proposed order denying Zandian's motion to set aside the judgment.   |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129048     | Draft email to Samantha Valerius regarding proposed order denying motion to set aside judgment.                  |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129053     | Review Zandian's reply in support of motion for stay of proceedings to enforce the judgment, dated 1/29/14.      |                          |       |         |       |                |
| Feb 5/2014  | Lawyer: MDF 1.00 Hrs X 300.00  | MDF - Matthew D. Francis | 1.00  | 300.00  | 12624 | Billed         |
| 1129234     | Review and revise proposed order denying Defendants' Motion to Set aside/  |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129184     | Review email, dated 2/6/14, from Samantha Valerius, judge's law clerk, regarding judge signing order denying mo  |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129185     | Draft email to Samantha Valerius, judge's law clerk, regarding judge signing order denying motion to set aside   |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen   | 0.30  | 90.00   | 12624 | Billed         |
| 1129186     | Draft email to Jonathon Fayeghi regarding debtor's examination.  |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen   | 0.20  | 60.00   | 12624 | Billed         |
| 1129187     | Telephone conference with Fred Sadri   |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129195     | Review email, dated 2/6/14, from Johnathon Fayeghi regarding Zandian's debtor's examination.                     |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129196     | Draft email to Johnathon Fayeghi regarding Zandian's debtor's examination.                                       |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129197     | Draft email to Jed Margolin  |                          |       |         |       |                |
| Feb 6/2014  | Lawyer: MDF 0.40 Hrs X 300.00  | MDF - Matthew D. Francis | 0.40  | 120.00  | 12624 | Billed         |
| 1129284     | Conference with APM  |                          |       |         |       |                |
| Feb 7/2014  | Lawyer: NRL 0.70 Hrs X 125.00  | NRL - Nancy R. Lindsley  | 0.70  | 87.50   | 12624 | Billed         |
| 1129524     | Review Order Denying Motion to Set Aside Default Judgment; scan and transmit to opposing counsel; preparation o  |                          |       |         |       |                |
| Feb 7/2014  | Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen   | 0.20  | 60.00   | 12624 | Billed         |
| 1129542     | Call and email John Fayeghi regarding Zandian's non-response to order to produce documents prior to debtor's ex  |                          |       |         |       |                |
| Feb 7/2014  | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129551     | Draft email to Jed Margolin  |                          |       |         |       |                |
| Feb 7/2014  | Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen   | 0.30  | 90.00   | 12624 | Billed         |
| 1129554     | Review order denying Zandian's motion to set aside judgment, dated 2/6/14.                                       |                          |       |         |       |                |
| Feb 7/2014  | Lawyer: MDF 0.80 Hrs X 300.00  | MDF - Matthew D. Francis | 0.80  | 240.00  | 12624 | Billed         |
| 1130702     | Conference with APM  |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129743     | Draft another email to John Fayeghi regarding tomorrow's debtor's examination of Zandian.                        |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129744     | Draft debtor's examination questions.  |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.30 Hrs X 300.00  | APM - Adam P. McMillen   | 0.30  | 90.00   | 12624 | Billed         |
| 1129746     | Review and respond to email, dated 2/10/14, from John Fayeghi regarding debtor's examination                     |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.80 Hrs X 300.00  | APM - Adam P. McMillen   | 0.80  | 240.00  | 12624 | Billed         |
| 1129748     | Draft email to Court regarding Zandian not appearing before the court tomorrow on debtor's examination.          |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.20 Hrs X 300.00  | APM - Adam P. McMillen   | 0.20  | 60.00   | 12624 | Billed         |
| 1129756     | Review email, dated 2/10/14, from Angela Jeffries regarding vacating debtor's examination and requesting a       |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |
| 1129757     | Draft email to Angela Jeffries regarding vacating debtor's examination and requesting a motion for order to sho  |                          |       |         |       |                |
| Feb 10/2014 | Lawyer: APM 0.10 Hrs X 300.00  | APM - Adam P. McMillen   | 0.10  | 30.00   | 12624 | Billed         |

| Date        | Entry # | Fee / Time                    | Explanation  | Hours | Amount  | Inv#  | Billing Status |
|-------------|---------|-------------------------------|--|-------|---------|-------|----------------|
| Feb 10/2014 | 1129758 | Lawyer: APM 0.20 Hrs X 300.00 | Draft email to Jed Margolin [REDACTED]   | 0.20  | 60.00   | 12624 | Billed         |
| Feb 10/2014 | 1129759 | Lawyer: APM 0.30 Hrs X 300.00 | Review Wells Fargo's response to \$55,000 transaction to Zandian.  | 0.30  | 90.00   | 12624 | Billed         |
| Feb 10/2014 | 1129760 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 2/10/14, from Jed Margolin [REDACTED]  | 0.20  | 60.00   | 12624 | Billed         |
| Feb 10/2014 | 1129761 | Lawyer: APM 0.20 Hrs X 300.00 | Respond to Jed Margolin's email [REDACTED]   | 0.20  | 60.00   | 12624 | Billed         |
| Feb 10/2014 | 1130645 | Lawyer: MDF 1.00 Hrs X 300.00 | Conference with APM [REDACTED]   | 1.00  | 300.00  | 12624 | Billed         |
| Feb 11/2014 | 1130034 | Lawyer: NRL 1.00 Hrs X 125.00 | Reorganize file materials; review emails between APM and opposing counsel and court                              | 1.00  | 125.00  | 12624 | Billed         |
| Feb 11/2014 | 1130053 | Lawyer: APM 4.40 Hrs X 300.00 | Draft Motion for Order to Show Cause Regarding Contempt, as requested by the court.                              | 4.40  | 1320.00 | 12624 | Billed         |
| Feb 11/2014 | 1130138 | Lawyer: MDF 1.30 Hrs X 300.00 | Review and revise motion to show cause why Defendant should not be held in contempt, [REDACTED]                  | 1.30  | 390.00  | 12624 | Billed         |
| Feb 12/2014 | 1130659 | Lawyer: NRL 1.00 Hrs X 125.00 | Finalize Motion for Order to Show Cause Re Contempt vs. Zandian; compile exhibits; transmit for filing; serve v. | 1.00  | 125.00  | 12624 | Billed         |
| Feb 12/2014 | 1130680 | Lawyer: APM 0.10 Hrs X 300.00 | Finish drafting motion for contempt sanctions.   | 0.10  | 30.00   | 12624 | Billed         |
| Feb 24/2014 | 1131791 | Lawyer: APM 0.30 Hrs X 300.00 | Review Zandian's substitution of attorney's, dated 2/21/14.  | 0.30  | 90.00   | 12624 | Billed         |
| Feb 24/2014 | 1131793 | Lawyer: APM 0.10 Hrs X 300.00 | Draft email to Jed Margolin [REDACTED]   | 0.10  | 30.00   | 12624 | Billed         |
| Feb 24/2014 | 1131860 | Lawyer: APM 0.10 Hrs X 300.00 | Review and respond to Jed Margolin's email, dated 2/24/14, [REDACTED]  | 0.10  | 30.00   | 12624 | Billed         |
| Mar 4/2014  | 1132838 | Lawyer: APM 0.10 Hrs X 300.00 | Review voicemail, dated 3/4/14, from Fred Sadri [REDACTED]   | 0.10  | 30.00   | 12651 | Billed         |
| Mar 4/2014  | 1132839 | Lawyer: APM 0.70 Hrs X 300.00 | Review Opposition to Motion for Order to Show Cause Regarding Contempt, dated 3/3/14.                            | 0.70  | 210.00  | 12651 | Billed         |
| Mar 4/2014  | 1132840 | Lawyer: APM 0.10 Hrs X 300.00 | Draft email to Jed Margolin [REDACTED]   | 0.10  | 30.00   | 12651 | Billed         |
| Mar 4/2014  | 1132853 | Lawyer: APM 0.20 Hrs X 300.00 | Review and respond to email, dated 3/4/14, from Jed Margolin [REDACTED]  | 0.20  | 60.00   | 12651 | Billed         |
| Mar 4/2014  | 1132931 | Lawyer: MDF 0.80 Hrs X 300.00 | Review opposition to motion for order to show cause re: contempt/Draft and review e-mails to and from APM re: s: | 0.80  | 240.00  | 12651 | Billed         |
| Mar 4/2014  | 1134283 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 3/4/14, from Jed Margolin [REDACTED]   | 0.20  | 60.00   | 12651 | Billed         |
| Mar 5/2014  | 1133305 | Lawyer: APM 0.10 Hrs X 300.00 | Review voicemail from Fred Sadri [REDACTED]  | 0.10  | 30.00   | 12651 | Billed         |
| Mar 5/2014  | 1133306 | Lawyer: APM 0.30 Hrs X 300.00 | Telephone conference with Fred Sadri [REDACTED]  | 0.30  | 90.00   | 12651 | Billed         |
| Mar 5/2014  | 1134285 | Lawyer: APM 0.10 Hrs X 300.00 | Review email, dated 3/5/14, from Jed Margolin [REDACTED]   | 0.10  | 30.00   | 12651 | Billed         |
| Mar 5/2014  | 1136894 | Lawyer: NRL 1.00 Hrs X 125.00 | Review Opposition to Motion for OSC; calendar reply to same; review Carson City County website to confirm if Za  | 1.00  | 125.00  | 12651 | Billed         |
| Mar 8/2014  | 1134292 | Lawyer: APM 0.10 Hrs X 300.00 | Review email, dated 3/8/14, from Jed Margolin [REDACTED]   | 0.10  | 30.00   | 12651 | Billed         |
| Mar 10/2014 | 1134284 | Lawyer: APM 0.10 Hrs X 300.00 | Review attachments attached to 3/4/14 email from Jed Margolin [REDACTED]   | 0.10  | 30.00   | 12651 | Billed         |
| Mar 11/2014 | 1134398 | Lawyer: APM 0.50 Hrs X 300.00 | Review Jed Margolin's comments [REDACTED]  | 0.50  | 150.00  | 12651 | Billed         |
| Mar 11/2014 | 1134399 | Lawyer: APM 3.90 Hrs X 300.00 | Draft reply in support of motion for contempt sanctions.   | 3.90  | 1170.00 | 12651 | Billed         |
| Mar 12/2014 | 1134505 | Lawyer: APM 1.60 Hrs X 300.00 | Continue drafting reply in support of motion for contempt sanctions.   | 1.60  | 480.00  | 12651 | Billed         |
| Mar 12/2014 | 1134512 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 3/12/14, from Jed Margolin [REDACTED]  | 0.20  | 60.00   | 12651 | Billed         |
| Mar 13/2014 | 1134610 | Lawyer: NRL 1.50 Hrs X 125.00 | Review and finalize Reply iso Motion for OSC; preparation of Request for Submission; telephone conference with 1 | 1.50  | 187.50  | 12651 | Billed         |
| Mar 13/2014 | 1134671 | Lawyer: APM 0.20 Hrs X 300.00 | Finish drafting reply in support of motion for contempt sanctions.   | 0.20  | 60.00   | 12651 | Billed         |
| Mar 13/2014 | 1134680 | Lawyer: APM 0.30 Hrs X 300.00 | Perform legal research [REDACTED]  | 0.30  | 90.00   | 12651 | Billed         |
| Mar 19/2014 | 1136412 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 3/19/14, from Jed Margolin [REDACTED]  | 0.20  | 60.00   | 12651 | Billed         |

Watson Rounds  
Client Fees Listing  
Oct/18/2013 To Apr/18/2014  
Working Lawyer

| Date        | Fee / Time  | Hours | Amount | Inv#  | Billing Status |
|-------------|---|-------|--------|-------|----------------|
| Entry #     | Explanation   |       |        |       |                |
| Mar 20/2014 | Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00 | 12651 | Billed         |
| 1135506     | Communicate with Matt Frances   |       |        |       |                |
| Mar 20/2014 | Lawyer: APM 0.90 Hrs X 300.00   | 0.90  | 270.00 | 12651 | Billed         |
| 1135507     | Telephonic conference with Jed Margolin   |       |        |       |                |
| Mar 20/2014 | Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00 | 12651 | Billed         |
| 1135512     | Draft letter to Jason Woodbury requesting debtor's examination and documents from Zandian.                      |       |        |       |                |
| Mar 20/2014 | Lawyer: NRL 0.20 Hrs X 125.00   | 0.20  | 25.00  | 12651 | Billed         |
| 1135530     | Finalize letter to Jason Woodbury; transmit via email and US Mail   |       |        |       |                |
| Mar 20/2014 | Lawyer: MDF 0.50 Hrs X 300.00   | 0.50  | 150.00 | 12651 | Billed         |
| 1135900     | Conference with Adam Mcmillen   |       |        |       |                |
| Mar 20/2014 | Lawyer: APM 0.50 Hrs X 300.00   | 0.50  | 150.00 | 12651 | Billed         |
| 1136416     | Review email, dated 3/20/14, from Jed Margolin  |       |        |       |                |
| Mar 22/2014 | Lawyer: APM 0.50 Hrs X 300.00   | 0.50  | 150.00 | 12651 | Billed         |
| 1136422     | Review email, dated 3/21/14, from Jed Margolin  |       |        |       |                |
| Mar 25/2014 | Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00  | 12651 | Billed         |
| 1135892     | Review and respond to email, dated 3/25/14, from Jed Margolin   |       |        |       |                |
| Mar 25/2014 | Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00 | 12651 | Billed         |
| 1135983     | Review and respond to email, dated 3/25/14, from Jed Margolin   |       |        |       |                |
| Mar 25/2014 | Lawyer: APM 0.40 Hrs X 300.00   | 0.40  | 120.00 | 12651 | Billed         |
| 1136737     | Review email, dated 3/25/14, from Jed Margolin  |       |        |       |                |
| Mar 26/2014 | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12651 | Billed         |
| 1135890     | Review email, dated 3/26/14, from Jed Margolin  |       |        |       |                |
| Mar 26/2014 | Lawyer: APM 0.50 Hrs X 300.00   | 0.50  | 150.00 | 12651 | Billed         |
| 1135891     | Review email, dated 3/25/14, from Jed Margolin  |       |        |       |                |
| Mar 26/2014 | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12651 | Billed         |
| 1135893     | Review email, dated 3/26/14, from Jed Margolin  |       |        |       |                |
| Mar 26/2014 | Lawyer: APM 0.60 Hrs X 300.00   | 0.60  | 180.00 | 12651 | Billed         |
| 1135894     | Telephone call with Jed Margolin  |       |        |       |                |
| Mar 26/2014 | Lawyer: MDF 1.00 Hrs X 300.00   | 1.00  | 300.00 | 12651 | Billed         |
| 1135954     | Review property title documents/Conference with APM re: strategy for execution and related issues               |       |        |       |                |
| Mar 27/2014 | Lawyer: NRL 2.00 Hrs X 125.00   | 2.00  | 250.00 | 12651 | Billed         |
| 1135975     | Review notes and research regarding execution vs real property; commence pre                                    |       |        |       |                |
| Mar 28/2014 | Lawyer: NRL 2.50 Hrs X 125.00   | 2.50  | 312.50 | 12651 | Billed         |
| 1136128     | Commence preparation of Motion for Writ of Execution, Writ of Execution and First Memorandum of Post-Judgment C |       |        |       |                |
| Mar 28/2014 | Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00  | 12651 | Billed         |
| 1136134     | Draft writ of execution.  |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00  | 12651 | Billed         |
| 1136403     | Review and respond to email, dated 3/31/14, from Jed Margolin   |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00  | 12651 | Billed         |
| 1136404     | Revise first memo of post-judgment costs and fees.  |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12651 | Billed         |
| 1136405     | Revise writ of execution.   |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12651 | Billed         |
| 1136407     | Review email, dated 3/28/14, from Jason Woodbury regarding Zandian's motion filed recently                      |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00  | 12651 | Billed         |
| 1136433     | Communicate with Jed Margolin   |       |        |       |                |
| Mar 31/2014 | Lawyer: NRL 2.00 Hrs X 125.00   | 2.00  | 250.00 | 12651 | Billed         |
| 1136549     | Finalize First Memorandum of Costs; Motion for Issuance of Writ; recalculate interest; and preparation of of Af |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12651 | Billed         |
| 1136862     | Review email, dated 4/1/14, from Jed Margolin   |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12651 | Billed         |
| 1136865     | Review proposed motion for writ of execution.   |       |        |       |                |
| Mar 31/2014 | Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00  | 12651 | Billed         |
| 1136870     | Review voicemail from Fred Sadri and return his call.   |       |        |       |                |
| Mar 31/2014 | Lawyer: NRL 2.50 Hrs X 125.00   | 2.50  | 312.50 | 12651 | Billed         |
| 1137007     | Finalize Motion for Writ of Execution; telephone conference with Steve Wood of Washoe County Sheriff's Office r |       |        |       |                |
| Apr 1/2014  | Lawyer: NRL 1.00 Hrs X 125.00   | 1.00  | 125.00 | 12682 | Billed         |
| 1137094     | Review Clark County and Washoe County deeds for insertion of legal description into Writs of Execution; revise  |       |        |       |                |
| Apr 1/2014  | Lawyer: NRL 0.50 Hrs X 125.00   | 0.50  | 62.50  | 12682 | Billed         |
| 1137101     | Review emails; calendar response to Motion for Writ of Execution  |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00  | 12682 | Billed         |
| 1137194     | Review email, dated 4/2/14, from Jed Margolin   |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 1.20 Hrs X 300.00   | 1.20  | 360.00 | 12682 | Billed         |
| 1137195     | Review Zandian's motion to dismiss and vacate default judgment.   |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.10 Hrs X 300.00   | 0.10  | 30.00  | 12682 | Billed         |
| 1137196     | Draft email to Jason Woodbury regarding debtor's examination and bizarre motion filed by Zandian.               |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.60 Hrs X 300.00   | 0.60  | 180.00 | 12682 | Billed         |
| 1137197     | Review file stamped motion to dismiss in Abrishami v Gold Canyon, dated 3/24/14.                                |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.30 Hrs X 300.00   | 0.30  | 90.00  | 12682 | Billed         |
| 1137199     | Review file-stamped motion, dated 3/24/14.  |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00  | 12682 | Billed         |
| 1137200     | Telephone conference with Fred Sadri.   |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00  | 12682 | Billed         |
| 1137201     | Review letter, dated 12/4/13, from Kristin Luis to Judge Wilson regarding Gold Canyon case.                     |       |        |       |                |
| Apr 2/2014  | Lawyer: APM 0.20 Hrs X 300.00   | 0.20  | 60.00  | 12682 | Billed         |
| 1137206     | Review and respond to email, dated 4/2/14, from Jed Margolin  |       |        |       |                |
| Apr 27/2014 | Lawyer: NRL 1.00 Hrs X 125.00   | 1.00  | 125.00 | 12682 | Billed         |
| 1137225     | Brief review Motion and supporting documents filed by Zandian; calendar response to same                        |       |        |       |                |

| Date        | Entry # | Fee / Time                    | Explanation   | Hours | Amount | Inv#  | Billing Status |
|-------------|---------|-------------------------------|---|-------|--------|-------|----------------|
| Apr 8/2014  | 1139451 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 4/7/14, from Jed Margolin   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 8/2014  | 1138186 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 4/8/14, from Jed Margolin   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 8/2014  | 1138191 | Lawyer: APM 1.00 Hrs X 300.00 | Telephone call with Jed Margolin regarding  | 1.00  | 300.00 | 12682 | Billed         |
| Apr 8/2014  | 1138198 | Lawyer: NRL 0.50 Hrs X 125.00 | Telephone conference with Steve Wood of the Washoe County Sheriff's office re execution vs. real properties; le | 0.50  | 62.50  | 12682 | Billed         |
| Apr 8/2014  | 1138223 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 4/8/14, from Jed Margolin   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 9/2014  | 1138213 | Lawyer: APM 0.20 Hrs X 300.00 | Draft opposition to Zandian's motion to dismiss   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 9/2014  | 1138215 | Lawyer: APM 0.30 Hrs X 300.00 | Review and respond to emails, dated 4/9/14, from Jason Woodbury regarding Zandian's motion to dismiss           | 0.30  | 90.00  | 12682 | Billed         |
| Apr 9/2014  | 1138216 | Lawyer: APM 0.10 Hrs X 300.00 | Draft email to Jed Margolin   | 0.10  | 30.00  | 12682 | Billed         |
| Apr 9/2014  | 1138250 | Lawyer: NRL 0.30 Hrs X 125.00 | Telephone conference with Court Clerk re issuance of Writs; preparation of memo to APM re same                  | 0.30  | 37.50  | 12682 | Billed         |
| Apr 9/2014  | 1138532 | Lawyer: APM 0.20 Hrs X 300.00 | Review and respond to email from Nancy Lindsley   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 10/2014 | 1138333 | Lawyer: NRL 0.50 Hrs X 125.00 | Review Motion to Retax and Settle Costs; calendar response to same  | 0.50  | 62.50  | 12682 | Billed         |
| Apr 11/2014 | 1138506 | Lawyer: APM 0.20 Hrs X 300.00 | Review and respond to email, dated 4/11/14, from Jed Margolin   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 14/2014 | 1138500 | Lawyer: APM 0.30 Hrs X 300.00 | Meet with Matt Francis  | 0.30  | 90.00  | 12682 | Billed         |
| Apr 14/2014 | 1138502 | Lawyer: APM 0.20 Hrs X 300.00 | Review email, dated 4/14/14, from Jed Margolin  | 0.20  | 60.00  | 12682 | Billed         |
| Apr 14/2014 | 1138507 | Lawyer: APM 0.10 Hrs X 300.00 | Draft email to Jason Woodbury regarding stipulation to withdraw motion to dismiss from Zandian                  | 0.10  | 30.00  | 12682 | Billed         |
| Apr 14/2014 | 1138511 | Lawyer: APM 0.10 Hrs X 300.00 | Review and respond to another email, dated 4/14/14, from Jed Margolin   | 0.10  | 30.00  | 12682 | Billed         |
| Apr 14/2014 | 1138512 | Lawyer: APM 0.70 Hrs X 300.00 | Revise declaration for JP Lee, gather old letters regarding same and draft email to JP Lee requesting him to si | 0.70  | 210.00 | 12682 | Billed         |
| Apr 14/2014 | 1138521 | Lawyer: APM 0.10 Hrs X 300.00 | Review email, dated 4/14/14, from Jason Woodbury regarding stipulation to withdraw Zandian's motion to dismiss  | 0.10  | 30.00  | 12682 | Billed         |
| Apr 14/2014 | 1138522 | Lawyer: APM 0.10 Hrs X 300.00 | Review first draft of Jason Woodbury's proposed stipulation to withdraw Zandian's motion to dismiss             | 0.10  | 30.00  | 12682 | Billed         |
| Apr 14/2014 | 1138523 | Lawyer: APM 0.20 Hrs X 300.00 | Draft emails to Jason Woodbury regarding proposed stipulation to withdraw Zandian's motion to dismiss           | 0.20  | 60.00  | 12682 | Billed         |
| Apr 14/2014 | 1138547 | Lawyer: NRL 0.50 Hrs X 125.00 | Transmit executed Stipulation and Order to Withdraw Motion to Jason Woodbury                                    | 0.50  | 62.50  | 12682 | Billed         |
| Apr 15/2014 | 1138697 | Lawyer: APM 0.20 Hrs X 300.00 | Begin review of Zandian's motion to retax, dated 4/9/14   | 0.20  | 60.00  | 12682 | Billed         |
| Apr 15/2014 | 1138698 | Lawyer: APM 0.10 Hrs X 300.00 | Review email, dated 4/15/14, from Tiffany Dube regarding request for declaration from JP Lee                    | 0.10  | 30.00  | 12682 | Billed         |
| Apr 15/2014 | 1138699 | Lawyer: APM 0.10 Hrs X 300.00 | Review letter, dated 4/15/14, from JP Lee regarding request for declaration                                     | 0.10  | 30.00  | 12682 | Billed         |
| Apr 15/2014 | 1138934 | Lawyer: MDF 0.50 Hrs X 300.00 | Review motion to retax costs/Emails with APM re: same   | 0.50  | 150.00 | 12682 | Billed         |
| Apr 16/2014 | 1138801 | Lawyer: NRL 0.80 Hrs X 125.00 | Generate report reflecting costs incurred from 6/26/2013 to present; commence preparation of revised Memorandum | 0.80  | 100.00 | 12682 | Billed         |
| Apr 16/2014 | 1138816 | Lawyer: APM 1.40 Hrs X 300.00 | Finish review of Zandian's motion to retax  | 1.40  | 420.00 | 12682 | Billed         |
| Apr 16/2014 | 1138817 | Lawyer: APM 1.70 Hrs X 300.00 | Begin drafting opposition to Zandian's motion to retax  | 1.70  | 510.00 | 12682 | Billed         |
| Apr 16/2014 | 1138819 | Lawyer: APM 0.30 Hrs X 300.00 | Review and respond to email, dated 4/15/14, from Jed Margolin   | 0.30  | 90.00  | 12682 | Billed         |

| Date        | Entry # | Fee / Time Explanation   | Working Lawyer          | Hours | Amount  | Inv#  | Billing Status |
|-------------|---------|--|-------------------------|-------|---------|-------|----------------|
| Apr 16/2014 | 1138862 | Lawyer: APM 0.30 Hrs X 300.00 Meet with Matt Francis   | APM - Adam P. McMillen  | 0.30  | 90.00   | 12682 | Billed         |
| Apr 16/2014 | 1138863 | Lawyer: APM 0.20 Hrs X 300.00 Draft email to Jed Margolin  | APM - Adam P. McMillen  | 0.20  | 60.00   | 12682 | Billed         |
| Apr 16/2014 | 1138865 | Lawyer: APM 0.10 Hrs X 300.00 Draft email to Jed Margolin  | APM - Adam P. McMillen  | 0.10  | 30.00   | 12682 | Billed         |
| Apr 16/2014 | 1138866 | Lawyer: APM 3.40 Hrs X 300.00 Draft motion for post judgment fees and costs  | APM - Adam P. McMillen  | 3.40  | 1020.00 | 12682 | Billed         |
| Apr 16/2014 | 1139445 | Lawyer: APM 0.10 Hrs X 300.00 Review email, dated 4/16/14, from Jano Barnhurst regarding stipulation to withdraw motion filed by Zandian | APM - Adam P. McMillen  | 0.10  | 30.00   | 12682 | Billed         |
| Apr 16/2014 | 1139446 | Lawyer: APM 0.10 Hrs X 300.00 Review email, dated 4/15/14, from Jed Margolin   | APM - Adam P. McMillen  | 0.10  | 30.00   | 12682 | Billed         |
| Apr 17/2014 | 1138879 | Lawyer: APM 0.30 Hrs X 300.00 Review and respond to emails, dated 4/18/14, from Jed Margolin   | APM - Adam P. McMillen  | 0.30  | 90.00   | 12682 | Billed         |
| Apr 18/2014 | 1138926 | Lawyer: NRL 0.50 Hrs X 125.00 Generate reports from PCLaw for fees and costs from October 21, 2013 through April 21, 2014                | NRL - Nancy R. Lindsley | 0.50  | 62.50   | 12682 | Billed         |
| Apr 18/2014 | 1138927 | Lawyer: NRL 1.00 Hrs X 125.00 Review/proof Motion for Order Allowing Costs and APM Dec iso same; compile exhibits                        | NRL - Nancy R. Lindsley | 1.00  | 125.00  | 12682 | Billed         |
| Apr 18/2014 | 1138937 | Lawyer: APM 0.10 Hrs X 300.00 Draft email to Jed Margolin  | APM - Adam P. McMillen  | 0.10  | 30.00   | 12682 | Billed         |
| Apr 18/2014 | 1138938 | Lawyer: APM 1.60 Hrs X 300.00 Finish drafting motion for postjudgment fees and costs   | APM - Adam P. McMillen  | 1.60  | 480.00  | 12682 | Billed         |
| Apr 18/2014 | 1138944 | Lawyer: APM 0.10 Hrs X 300.00 Review and respond to email, dated 4/18/14, from Jed Margolin  | APM - Adam P. McMillen  | 0.10  | 30.00   | 12682 | Billed         |

Unbilled: 0.00 0.00  
Billed: 143.40 34812.50  
Total: 143.40 34812.50  
Percent Billed: 100.00 100.00

\*\*\* Summary by Working Lawyer \*\*\*

| Working Lawyer    | Hours       |               |               |               | Fees          |               |             |               |
|-------------------|-------------|---------------|---------------|---------------|---------------|---------------|-------------|---------------|
|                   | Unbilled    | Firm %        | Billed        | % Bld         | Unbilled      | Firm %        | Billed      | % Bld         |
| MDF - Matthew D.  | 0.00        | 100.00        | 14.40         | 10.04         | 14.40         | 100.00        | 0.00        | 100.00        |
| APM - Adam P. Mct | 0.00        | 100.00        | 82.10         | 57.25         | 82.10         | 100.00        | 0.00        | 100.00        |
| NRL - Nancy R. Li | 0.00        | 100.00        | 46.90         | 32.71         | 46.90         | 100.00        | 0.00        | 100.00        |
| <b>Firm Total</b> | <b>0.00</b> | <b>100.00</b> | <b>143.40</b> | <b>100.00</b> | <b>143.40</b> | <b>100.00</b> | <b>0.00</b> | <b>100.00</b> |

\*\*\* Summary by Responsible Lawyer \*\*\*

| Responsible Lawyer | Hours       |               |               |               | Fees          |               |             |               |
|--------------------|-------------|---------------|---------------|---------------|---------------|---------------|-------------|---------------|
|                    | Unbilled    | Firm %        | Billed        | % Bld         | Unbilled      | Firm %        | Billed      | % Bld         |
| APM - Adam P. Mct  | 0.00        | 100.00        | 143.40        | 100.00        | 143.40        | 100.00        | 0.00        | 100.00        |
| <b>Firm Total</b>  | <b>0.00</b> | <b>100.00</b> | <b>143.40</b> | <b>100.00</b> | <b>143.40</b> | <b>100.00</b> | <b>0.00</b> | <b>100.00</b> |

REPORT SELECTIONS - Client Fees Listing

Layout Template: Default  
 Advanced Search Filter: None  
 Requested by: Nancy  
 Finished: Monday, May 12, 2014 at 11:34:52 AM  
 Ver: 13.0 SPL (13.0.20131028)  
 Date Range: Oct/18/2013 To Apr/18/2014  
 Matters: 5457.01  
 Clients: All  
 Major Clients: All  
 Client Intro Lawyer: All  
 Matter Intro Lawyer: All  
 Responsible Lawyer: All  
 Assigned Lawyer: All  
 Type of Law: All  
 Select From: Active, Inactive, Archived Matters  
 Matters Sort by: Default  
 New Page for Each Lawyer: No  
 Firm Totals Only: No  
 Client balances only: No  
 Matter balances only: No  
 Entries Shown - Billed Only: Yes  
 Entries Shown - Unbilled: Yes  
 Entries Shown - Billable Tasks: Yes

Watson Rounds  
Client Fees Listing  
Oct/18/2013 To Apr/18/2014  
Working Lawyer

| Date    | Fee / Time                          | Hours | Amount | Inv# | Billing Status |
|---------|-------------------------------------|-------|--------|------|----------------|
| Entry # | Explanation                         |       |        |      |                |
|         | Entries Shown - Write Up/Down Tasks | Yes   |        |      |                |
|         | Entries Shown - No Charge Tasks     | Yes   |        |      |                |
|         | Entries Shown - Non Billable Tasks  | Yes   |        |      |                |
|         | Working Lawyer                      | All   |        |      |                |

# Exhibit 3

Exhibit 3

| Date        | Entry # | Received From/Paid To<br>Explanation                             | Chq#<br>Rec# | ----- General ----- |        | Bld  ----- Trust Activity ----- |        |     |       |       |                  |
|-------------|---------|--|--------------|---------------------|--------|---------------------------------|--------|-----|-------|-------|------------------|
|             |         |  |              | Rcpts               | Disbs  | Fees                            | Inv#   | Acc | Rcpts | Disbs | Balance          |
| 5457        |         | Margolin, Jed  |              |                     |        |                                 |        |     |       |       |                  |
| 5457.01     |         | Patent theft analysis & litigation                               |              |                     |        |                                 |        |     |       |       |                  |
| Oct 22/2013 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       | Resp Lawyer: APM |
| 1115832     |         | Process service expense  |              |                     | 52.00  |                                 | 124091 |     |       |       |                  |
| Nov 7/2013  |         | Billing on Invoice 124091  |              |                     |        |                                 |        |     |       |       |                  |
| 1117911     |         | FEES 3512.50   |              |                     | 0.00   |                                 | 124091 |     |       |       |                  |
|             |         | DISBS 194.20   |              |                     |        |                                 |        |     |       |       |                  |
| Nov 13/2013 |         | Bank of America  |              |                     |        |                                 |        |     |       |       |                  |
| 1118672     |         | Witness fee subpoena for Bank of America                         | 2475         |                     | 25.00  |                                 | 124555 |     |       |       |                  |
| Nov 13/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1120227     |         | Postage  | 16627        |                     | 5.28   |                                 | 124555 |     |       |       |                  |
| Nov 18/2013 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       |                  |
| 1119582     |         | Process service expense  |              |                     | 52.00  |                                 | 124555 |     |       |       |                  |
| Dec 9/2013  |         | Billing on Invoice 124555  |              |                     |        |                                 |        |     |       |       |                  |
| 1121920     |         | FEES 577.50  |              |                     | 0.00   |                                 | 124555 |     |       |       |                  |
|             |         | DISBS 82.28  |              |                     |        |                                 |        |     |       |       |                  |
| Dec 9/2013  |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1124586     |         | Photocopies 160 @ 0.25 - Service copies/2 SDTs                   | 16680        |                     | 40.00  |                                 | 125011 |     |       |       |                  |
| Dec 10/2013 |         | Charles Schwab & Co., Inc.                                       |              |                     |        |                                 |        |     |       |       |                  |
| 1122115     |         | Witness fee Charles Schwab                                       | 2569         |                     | 25.00  |                                 | 125011 |     |       |       |                  |
| Dec 10/2013 |         | E-Trade Bank   |              |                     |        |                                 |        |     |       |       |                  |
| 1122117     |         | Witness fee - E-Trade Bank                                       | 2570         |                     | 25.00  |                                 | 125011 |     |       |       |                  |
| Dec 10/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1123859     |         | Postage  | 16668        |                     | 8.96   |                                 | 125011 |     |       |       |                  |
| Dec 11/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1123860     |         | Postage  | 16668        |                     | 24.48  |                                 | 125011 |     |       |       |                  |
| Dec 11/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1124587     |         | Photocopies 570 @ 0.25 - Motion for judgment/debtor exam         | 16680        |                     | 142.50 |                                 | 125011 |     |       |       |                  |
| Dec 12/2013 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       |                  |
| 1123048     |         | Courier expense  |              |                     | 16.00  |                                 | 125011 |     |       |       |                  |
| Dec 12/2013 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       |                  |
| 1123301     |         | Courier expense  |              |                     | 37.00  |                                 | 125011 |     |       |       |                  |
| Dec 12/2013 |         | Bank of America  |              |                     |        |                                 |        |     |       |       |                  |
| 1123303     |         | Outside coping expense from BofA                                 |              |                     | 115.66 |                                 | 125011 |     |       |       |                  |
| Dec 18/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1124598     |         | Photocopies 126 @ 0.25 - Banking documents                       | 16680        |                     | 31.50  |                                 | 125011 |     |       |       |                  |
| Dec 19/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1124611     |         | Postage  | 16680        |                     | 1.72   |                                 | 125011 |     |       |       |                  |
| Dec 31/2013 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1124658     |         | Legal research documents   | 16682        |                     | 153.92 |                                 | 125011 |     |       |       |                  |
| Jan 9/2014  |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1128654     |         | Photocopies 640 @ 0.25 - Opposition/request for admissions/order | 16712        |                     | 160.00 |                                 | 125472 |     |       |       |                  |
| Jan 10/2014 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       |                  |
| 1125835     |         | Courier expense  |              |                     | 16.00  |                                 | 125472 |     |       |       |                  |
| Jan 13/2014 |         | Billing on Invoice 125011  |              |                     |        |                                 |        |     |       |       |                  |
| 1125944     |         | FEES 4527.50   |              |                     | 0.00   |                                 | 125011 |     |       |       |                  |
|             |         | DISBS 621.74   |              |                     |        |                                 |        |     |       |       |                  |
| Jan 16/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1128655     |         | Photocopies 64 @ 0.25 - Notice of entry                          | 16712        |                     | 16.00  |                                 | 125472 |     |       |       |                  |
| Jan 19/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1127892     |         | Postage  | 16707        |                     | 6.60   |                                 | 125472 |     |       |       |                  |
| Jan 29/2014 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       |                  |
| 1128111     |         | Courier expense  |              |                     | 95.00  |                                 | 125472 |     |       |       |                  |
| Jan 29/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1128663     |         | Postage  | 16712        |                     | 1.40   |                                 | 125472 |     |       |       |                  |
| Feb 1/2014  |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1129997     |         | Legal research documents   | 16730        |                     | 59.69  |                                 | 126244 |     |       |       |                  |
| Feb 10/2014 |         | Billing on Invoice 125472  |              |                     |        |                                 |        |     |       |       |                  |
| 1129614     |         | FEES 6510.00   |              |                     | 0.00   |                                 | 125472 |     |       |       |                  |
|             |         | DISBS 295.00   |              |                     |        |                                 |        |     |       |       |                  |
| Feb 10/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1131350     |         | Postage  | 16741        |                     | 13.60  |                                 | 126244 |     |       |       |                  |
| Mar 1/2014  |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1134969     |         | Westlaw litigation documents/downloads                           | 16783        |                     | 33.09  |                                 | 126514 |     |       |       |                  |
| Mar 7/2014  |         | Billing on Invoice 126244  |              |                     |        |                                 |        |     |       |       |                  |
| 1133801     |         | FEES 5767.50   |              |                     | 0.00   |                                 | 126244 |     |       |       |                  |
|             |         | DISBS 73.29  |              |                     |        |                                 |        |     |       |       |                  |
| Mar 13/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1135051     |         | Postage  | 16784        |                     | 0.90   |                                 | 126514 |     |       |       |                  |
| Mar 13/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1136514     |         | Photocopies 36 @ 0.25 - Reply                                    | 16803        |                     | 9.00   |                                 | 126514 |     |       |       |                  |
| Mar 17/2014 |         | Reno/Carson Messenger Service, Ir                                |              |                     |        |                                 |        |     |       |       |                  |
| 1134803     |         | Courier expense  |              |                     | 40.00  |                                 | 126514 |     |       |       |                  |
| Mar 20/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1136522     |         | Postage  | 16803        |                     | 0.48   |                                 | 126514 |     |       |       |                  |
| Mar 31/2014 |         | Expense Recovery   |              |                     |        |                                 |        |     |       |       |                  |
| 1137167     |         | Westlaw legal research documents                                 | 16810        |                     | 38.61  |                                 | 126514 |     |       |       |                  |
| Apr 1/2014  |         | First Judicial District Court                                    |              |                     |        |                                 |        |     |       |       |                  |
| 1136733     |         | Fee for issuance of Writ of Execution                            | 3004         |                     | 120.00 |                                 |        |     |       |       |                  |
| Apr 3/2014  |         | Billing on Invoice 126514  |              |                     |        |                                 |        |     |       |       |                  |
| 1137393     |         | FEES 8047.50   |              |                     | 0.00   |                                 | 126514 |     |       |       |                  |



| Date       | Received From/Paid To  | Chq# | ----- General ----- |       | Bld  ----- Trust Activity -----   |
|------------|--|------|---------------------|-------|-----------------------------------|
| Entry #    | Explanation  | Rec# | Rcpts               | Disbs | Fees Inv# Acc Rcpts Disbs Balance |
| Apr 4/2014 | DISBS 122.08   |      |                     |       |                                   |
| 1137826    | Reno/Carson Messenger Service, Ir<br>Process service expense |      |                     | 65.00 |                                   |

| TOTALS           | CHE    | + | UNBILLED | + | FEEES   | = | TOTAL   | DISBS    | + | FEEES     | + | TAX  | - | RECEIPTS  | = | BALANCES | TRUST    |
|------------------|--------|---|----------|---|---------|---|---------|----------|---|-----------|---|------|---|-----------|---|----------|----------|
| PERIOD           | 185.00 |   | 0.00     |   | 8275.00 |   | 8460.00 | 1246.39  |   | 25895.00  |   | 0.00 |   | 30331.09  |   | -3189.70 | -1109.14 |
| END DATE         | 185.00 |   | 0.00     |   | 8275.00 |   | 8460.00 | 27048.52 |   | 124026.25 |   | 0.00 |   | 151074.77 |   | 0.00     | 0.00     |
| General Retainer |        |   | 5000.00  |   |         |   |         |          |   |           |   |      |   |           |   |          |          |

| FIRM TOTAL       | CHE    | + | UNBILLED | + | FEEES   | = | TOTAL   | DISBS    | + | FEEES     | + | TAX  | - | RECEIPTS  | = | BALANCES | TRUST    |
|------------------|--------|---|----------|---|---------|---|---------|----------|---|-----------|---|------|---|-----------|---|----------|----------|
| PERIOD           | 185.00 |   | 0.00     |   | 8275.00 |   | 8460.00 | 1246.39  |   | 25895.00  |   | 0.00 |   | 30331.09  |   | -3189.70 | -1109.14 |
| END DATE         | 185.00 |   | 0.00     |   | 8275.00 |   | 8460.00 | 27048.52 |   | 124026.25 |   | 0.00 |   | 151074.77 |   | 0.00     | 0.00     |
| General Retainer |        |   | 5000.00  |   |         |   |         |          |   |           |   |      |   |           |   |          |          |

REPORT SELECTIONS - Client Ledger

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 Entries Shown - Disbursements Yes  
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 Entries Shown - Trust No  
 Incl. Matters with Retainer Bal No  
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 Trust Account All  
 Working Lawyer All  
 Include Corrected Entries No  
 Show Check # on Paid Payables No  
 Show Client Address No  
 Consolidate Payments No  
 Show Trust Summary by Account No  
 Show Interest No  
 Interest Up To Apr/21/2014  
 Show Invoices that Payments Were Applied to No  
 Display Entries in Date Order

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*

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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 Allowing Costs and Necessary Disbursements and Memorandum of Points and Authorities in Support Thereof, filed April 28, 2014;
- 2) Declaration of Adam McMillen in Support of Motion for Order Allowing Costs and Necessary Disbursements, with supporting exhibits, filed April 28, 2014;

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- 3) Defendant's Motion to Retax and Settle Costs (Opposition), filed April 30, 2014;  
and,
- 4) Plaintiff's Reply in Support of Motion for Order Allowing Costs and Necessary Disbursements, filed May 12, 2014.

**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: May 12, 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: May 12, 2014

  
Nancy Lindsley

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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BY *[Signature]*  
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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.

Case No. 09OC00579 1B  
Dept. No. I

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.

19  
20 **OPPOSITION TO MOTION FOR ORDER**  
**ALLOWING COSTS AND NECESSARY DISBURSEMENTS**

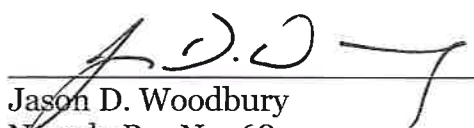
21 COMES NOW, Defendant REZA ZANDIAN (“ZANDIAN”), by and through his  
22 attorneys, Kaempfer Crowell, and hereby opposes the *Motion for Order Allowing Costs*  
23 *and Necessary Disbursements and Memorandum of Points and Authorities in Support*  
24 *Thereof (“Motion”)* served by mail on April 25, 2014. This *Opposition* is made pursuant

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703

1 to FJDCR 15(3) and is based on the attached memorandum of points and authorities, all  
2 papers and pleadings on file in this matter and any evidence received and arguments  
3 entertained by the Court at any hearing on the *Motion*.

4 DATED this 12<sup>th</sup> day of May, 2014.

5 **KAEMPFER CROWELL**

6  
7   
8 Jason D. Woodbury  
9 Nevada Bar No. 6870  
10 510 West Fourth Street  
11 Carson City, Nevada 89703  
12 Telephone: (775) 884-8300  
13 Facsimile: (775) 882-0257  
14 JWoodbury@kenvlaw.com  
15 ***Attorneys for Reza Zandian***

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 **A. THE COURT HAS DISCRETION TO AWARD COSTS AND EACH**  
3 **PARTY SHOULD BEAR THEIR OWN COSTS IN THIS CASE**

4 The determination of allowable costs is within the sound discretion of the trial  
5 court.<sup>1</sup> However, statutes permitting recovery of costs are in derogation of common law,  
6 and therefore must be strictly construed.<sup>2</sup>

7 Here, while Defendant believes each party should bear its own costs, Plaintiff  
8 seeks its photocopying costs at a rate of \$0.25 per page.<sup>3</sup> NRS 18.005(12) authorizes  
9 “[r]easonable costs for photocopies.” If the court is inclined to award costs, the Court  
10 should reduce photocopy charges to \$0.15 per page, or a total of \$288.72 for  
11 photocopies.<sup>4</sup>

12 **B. AN AWARD OF ATTORNEY’S FEES IS NOT APPROPRIATE AS A**  
13 **MATTER OF LAW**

14 It is well settled law in Nevada that the district court may not award attorney fees  
15 absent authority under a statute, rule, or contract.<sup>5</sup> Here, there is no applicable statute  
16 or rule and the parties did not enter into an agreement which permits an award of  
17 attorney’s fees. Therefore, the American Rule that each party should bear its own  
18 attorney’s fees and costs controls, and Plaintiff’s unsupported request for fees should be  
19 rejected.

20 \\\

21 \\\

22 <sup>1</sup> See *Bobby Berosini, Ltd. v. People for the Ethical Treatment of Animals*, 114 Nev. 1348, 1353-54, 971  
23 P.2d 383, 386 (1998) (citing *Bergmann v. Boyce*, 109 Nev. 670, 674, 856 P.2d 560, 563 (1993)).

24 <sup>2</sup> See *Gibellini v. Klindt*, 110 Nev. 1201, 1208, 885 P.2d 540, 544-45 (1994); NRS 18.005.

<sup>3</sup> See *Declaration of Adam McMillen in Support of Pl.’s Mot. for Order Allowing Costs and Necessary Disbursements at Exhibit 4* (April 25, 2014).

<sup>4</sup> See *Affidavit of Jano Barnhurst, Exhibit 1 to Motion to Retax and Settle Costs* (April 30, 2014).

<sup>5</sup> See, e.g., *Horgan v. Felton*, 123 Nev. 577, 583 170 P.3d 982, 986 (2007) (citing *Rowland v. Lepire*, 99 Nev. 308, 315, 662 P.2d 1332, 1336 (1983)).

1           **1. NRS 598.0999(2) does not permit an award of attorney’s fees in this**  
2           **case**

3           Plaintiff claims that under its claim for “deceptive trade practices” it is entitled to  
4           an award of attorney’s fees under “NRS 598.0999(2).”<sup>6</sup> While Plaintiff concedes that  
5           “NRS 598.0999(2) does not explicitly provide for attorney fees incurred postjudgment,”  
6           Plaintiff nonetheless relies exclusively on the authority of NRS 598.0999(2) in the  
7           request for an award of fees.

8           However, NRS 598.0999 does not permit an award of attorney’s fees in this case.  
9           In pertinent part, that statute provides:

10                   Except as otherwise provided in NRS 598.0974, in any action brought  
11                   pursuant to the provisions of NRS 598.0903 to 598.0999, inclusive, if the court  
12                   finds that a person has willfully engaged in a deceptive trade practice, *the district*  
13                   *attorney of any county in this State or the Attorney General bringing the action*  
14                   may recover a civil penalty not to exceed \$5,000 for each violation. The court in  
15                   *any such action* may, in addition to any other relief or reimbursement, award  
16                   reasonable attorney’s fees and costs.<sup>7</sup>

17           The statutory language “in any such action” refers to the potential action to be  
18           brought by the district attorney or the Attorney General in pursuing its civil recourse. It  
19           does not refer to an action brought by a Plaintiff in a civil action. Therefore, NRS  
20           598.0999(2) does not apply.

21           **2. The district court may not award attorney fees absent authority under**  
22           **a statute, rule, or contract.**

23           It is well settled Nevada law that attorney’s fees are not recoverable unless  
24           authorized by a statute, rule, or contractual provision.<sup>8</sup> Here, the American Rule that  
each party should bear its own attorney’s fees and costs remains the case, in the absence  
of a statute, rule or contract to the contrary. Under the “American Rule,” win or lose,

---

<sup>6</sup> See Motion at 3:24-28.

<sup>7</sup> NRS 598.0999(2) (emphasis added).

<sup>8</sup> See, e.g., *Horgan*, 123 Nev. at 583 170 P.3d at 986 (citing *Rowland*, 99 Nev. at 315, 662 P.2d at 1336)



1 the parties bear their own legal fees.<sup>9</sup> The district court may not award attorney fees  
2 absent authority under a statute, rule, or contract.<sup>10</sup>

3 **3. The court's exercise of discretion in determining the reasonable value**  
4 **of an attorney's services arises only when an award of attorney's fees**  
5 **is prescribed.**

6 While it is within this Court's discretion to determine the reasonable amount of  
7 attorney's fees under a statute or rule, in exercising its discretion, this Court must  
8 evaluate the factors set forth in *Brunzell v. Golden Gate National Bank*.<sup>11</sup> Here, the  
9 Court need not undertake such an analysis because there is no applicable statute or rule  
10 which permits an award of fees to the Plaintiff. The *Brunzell* analysis only arises in  
11 instances where attorney's fees are prescribed by statute, rule or contract.

12 **4. Even if a *Brunzell* analysis of an award of attorney's fees were**  
13 **permissible, Plaintiff's fees are inflated.**

14 This case has been a series of default judgments and did not require years of legal  
15 work focused on a specialty in intellectual property. If complex intellectual property  
16 issues were involved, it *might*, in general, justify opposing counsel's billable hourly rate.  
17 But this case was not driven by intellectual property law, but, rather, involves basic  
18 principles concerning the default judgment process. The *Complaint* reflects this fact: it  
19 offers up the run of the mill torts against Defendants and only alleges "deceptive trade  
20 practices," as the one and only "intellectual property" specialty. Further, not one of the  
21 Plaintiff's claims was ever never litigated and brought to a judgment on the merits. In  
22 fact, the fees Plaintiff seeks to recover are related solely to post-judgment work that has  
23 been performed – not even work that was performed to bring about the default  
24 judgment.

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<sup>9</sup> See *Fox v. Vice*, 131 S. Ct. 2205, 2213 (2011).

<sup>10</sup> See *State, Dep't of Human Resources v. Fowler*, 109 Nev. 782, 784, 858 P.2d 375, 376 (1993).

<sup>11</sup> 85 Nev. 345, 455 P.2d 31 (1969).

1 The judgment against this Defendant is exclusively by default and therefore, does  
2 not impose specialized skill or unusual time and attention to the work performed by  
3 counsel in this case. Plaintiff pursued and has only pursued default judgments against  
4 all Defendants since the matter's inception. Hence, this case required no specialized  
5 legal practice which justifies the hourly rate or justifies collection of an increased fee, if  
6 any at all.

7 The *Brunzell* factors evaluate: (1) the qualities of the advocate: his ability, his  
8 training, education, experience, professional standing and skill; (2) the character of the  
9 work to be done: its difficulty, its intricacy, its importance, time and skill required, the  
10 responsibility imposed and the prominence and character of the parties where they  
11 affect the importance of the litigation; (3) the work actually performed by the lawyer:  
12 the skill, time and attention given to the work; (4) the result: whether the attorney was  
13 successful and what benefits were derived.<sup>12</sup> As set forth above, no factor weighs in  
14 favor of an award of \$34,632.50 for 6 months of work dedicated to opposing a motion to  
15 set aside a default judgment, taking steps to execute against a default judgment, and  
16 responding to a notice of appeal.<sup>13</sup>

17 **5. Even if a *Brunzell* analysis of an award of attorney's fees was**  
18 **permissible, Plaintiff's requested fees are exclusively for post-**  
19 **judgment, pre-appeal work.**

20 Additionally, Plaintiff is asking that the *Brunzell* factors be applied exclusively to  
21 post-judgment accrued attorney's fees. The default judgment was obtained on June 24,  
22 2013 and Plaintiff is asking for its attorney's fees from "October 18, 2013 to April 18,  
23 2014."<sup>14</sup> Therefore, the *Brunzell* factors are applicable—if at all—only to the effort

24 <sup>12</sup> See *Brunzell*, 85 Nev. at 349, 455 P.2d at 33.

<sup>13</sup> The appeal has been assigned to the Nevada Supreme Court's settlement program and briefing has been suspended.

<sup>14</sup> *Motion* at 5:22-23.

1 expended in defeating the motion to set aside the default judgment filed on January 9,  
2 2014. No fees may be awarded for work performed related to the appeal noticed by  
3 Defendant on March 12, 2014.

4 To the extent that the attorney's fees are applied to post-appeal work by Plaintiff's  
5 counsel, an award of attorney's fees is prohibited in this case, as well. "There is no  
6 provision in the statutes authorizing the district court to award attorney fees incurred on  
7 appeal. NRAP 38(b) authorizes only this court [the Nevada Supreme Court] to make  
8 such an award if it determines that the appeals process has been misused."<sup>15</sup>

9 **C. POST-JUDGMENT INTEREST SHOULD NOT COME DUE BY THIS**  
10 **PREMATURE REQUEST**

11 The postjudgment interest is accounted for in the Court's June 24, 2013 *Default*  
12 *Judgment* "until satisfied." And the interest that Plaintiff alleges is due cannot be  
13 advanced via the *Motion*. Further, the matter is on appeal as of March 14, 2014.

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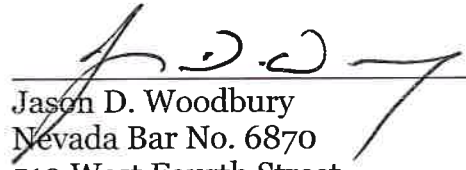
<sup>15</sup> *Board of Gallery of History, Inc. v. Datecs Corp.*, 116 Nev. 286, 288, 994 P. 2d 1149, 1150 (2000).

1 **D. CONCLUSION**

2 For all the reasons set forth herein, it is respectfully requested that this Court  
3 DENY Plaintiff's *Motion for Order Allowing Costs and Necessary Disbursements*.

4 DATED this 12<sup>th</sup> day of May, 2014.

5 **KAEMPFER CROWELL**

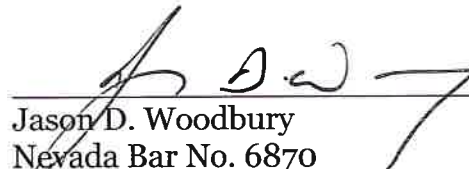
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8 Jason D. Woodbury  
9 Nevada Bar No. 6870  
10 510 West Fourth Street  
11 Carson City, Nevada 89703  
12 Telephone: (775) 884-8300  
13 Facsimile: (775) 882-0257  
14 JWoodbury@kcnvlaw.com  
15 **Attorneys for Reza Zandian**

12 **AFFIRMATION pursuant to NRS 239B.030**

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

15 DATED this 12<sup>th</sup> day of May, 2014.

16 **KAEMPFER CROWELL**

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18   
19 Jason D. Woodbury  
20 Nevada Bar No. 6870  
21 510 West Fourth Street  
22 Carson City, Nevada 89703  
23 Telephone: (775) 884-8300  
24 Facsimile: (775) 882-0257  
JWoodbury@kcnvlaw.com  
**Attorneys for Reza Zandian**

1 **CERTIFICATE OF SERVICE**

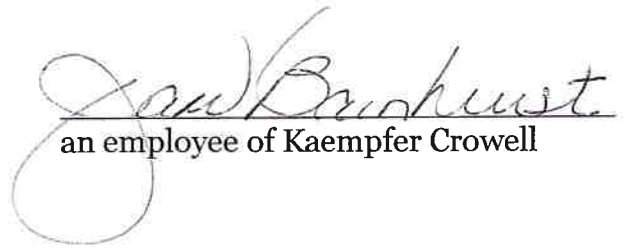
2 Pursuant to NRCP 5(b), I hereby certify that service of the foregoing

3 **OPPOSITION TO MOTION FOR ORDER ALLOWING COSTS AND**

4 **NECESSARY DISBURSEMENTS** was made this date by depositing a true copy of  
5 the same for mailing at Carson City, Nevada, 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 12<sup>th</sup> day of May, 2014.

12   
13 an employee of Kaempfer Crowell

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 MAY 14 PM 4:00  
ALAN GLOVER  
BY [Signature] DEPUTY CLERK

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**

**AMENDED REQUEST  
FOR SUBMISSION**

21  
22 Plaintiff through his counsel amends the Request for Submission filed in this matter on  
23 May 12, 2014, to include Defendant's Opposition to Motion for Order Allowing Costs and  
24 Necessary Disbursements which was filed on May 12, 2014.

25 Plaintiff respectfully requests the following documents be submitted to the Court for  
26 decision:

- 27 1) Motion for Order Allowing Costs and Necessary Disbursements and Memorandum  
28 of Points and Authorities in Support Thereof, filed April 28, 2014;

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- 2) Declaration of Adam McMillen in Support of Motion for Order Allowing Costs and Necessary Disbursements, with supporting exhibits, filed April 28, 2014;
- 3) Defendant’s Motion to Retax and Settle Costs (Opposition), filed April 30, 2014; and,
- 4) Plaintiff’s Reply in Support of Motion for Order Allowing Costs and Necessary Disbursements, filed May 12, 2014.
- 5) Opposition to Motion for Order Allowing Costs and Necessary Disbursements, filed May 12, 2014. (NOTE: The Opposition contains essentially the same arguments which were set forth in Defendant’s Motion to Retax and Settle Costs filed April 30, 2014).

**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: May 14, 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*

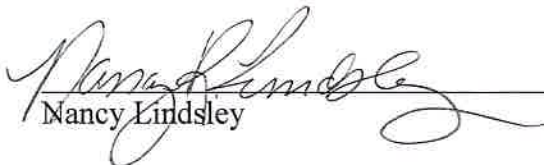
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**CERTIFICATE OF SERVICE**

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, **AMENDED 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: May 14, 2014


  
Nancy Lindsley



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Case No.: 090C00579 1B

Dept. No.: 1

**REC'D & FILED**  
**2014 MAY 19 PM 2: 22**  
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.

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

**ORDER ON MOTION FOR ORDER  
ALLOWING COSTS AND  
NECESSARY DISBURSEMENTS  
AND MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT  
THEREOF**

This matter comes before the Court on Plaintiff Jed Margolin’s (“Margolin”) Motion for Order Allowing Costs and Necessary Disbursements and Memorandum of Points and Authorities in Support Thereof, filed on April 28, 2014. On April 30, 2014, Defendant Reza Zandian (“Zandian”) filed a Motion to Retax and Settle Costs, wherein Defendant Zandian addressed Margolin’s Motion for Order Allowing Costs and Necessary Disbursements. On May 12, 2014, Zandian served an Opposition to Motion for Order Allowing Costs and

1 Necessary Disbursements, which restates the arguments included in the Motion to Retax. On  
2 May 12, 2014, Margolin filed a Reply in Support of the Motion for Order Allowing Costs and  
3 Necessary Disbursements and Margolin also filed a Request for Submission on the same date.  
4 On May 14, 2014, Margolin filed an Amended Request for Submission, finally submitting the  
5 Motion for Order Allowing Costs and Necessary Disbursements to the Court for decision.

6 Based upon the following facts and conclusions of law, the Motion for Order Allowing  
7 Costs and Necessary Disbursements is hereby GRANTED.

8  
9 **I. Postjudgment Costs**

10 Zandian does not dispute Margolin is allowed postjudgment costs under NRS 18.160  
11 and NRS 18.170. Zandian does not dispute the requested research, witness fees or process  
12 service/courier costs. Zandian only requests that the Court reduce the photocopy charges from  
13 \$0.25 to \$0.15 per page. Zandian relies upon what the "FedEx Office" in Carson City charges  
14 for copies to demonstrate that Margolin's rate of \$0.25 per page is not reasonable.

15 Margolin cites to the First Judicial District Court's own fee schedule for copy charges,  
16 which shows the Court charges \$0.50 per page for copies. The District Court's own fee  
17 schedule is a better exemplar of what reasonable copy charges should be in this matter. The  
18 rate of \$0.25 per page is half of what the Court charges for legal copies and the Court finds  
19 that \$0.25 is reasonable under the circumstances. Therefore, Margolin's copy charges will not  
20 be reduced and are awarded in full in the amount requested. Since Zandian did not oppose the  
21 other costs, Margolin is granted his costs pursuant to NRS 18.160 and NRS 18.170, as follows:

22  
23 **COSTS (October 18, 2013 THROUGH April 18, 2014):**

24 Postage/photocopies (in-house) \$ 481.20  
25 Research 285.31  
26 Witness Fees (Subpoenas) 215.66  
27 Process service/courier fees 373.00  
28 \$1,355.17

1                   **II.     Postjudgment Attorney’s Fees**

2                   Zandian argued that there is no applicable statute or rule upon which postjudgment  
3 attorney’s fees can be awarded to Margolin and that the parties did not enter into an agreement  
4 which affords attorney’s fees and therefore Margolin’s request for postjudgment attorney’s  
5 fees should be denied. Further, Zandian argues that NRS 598.0999(2) does not permit an  
6 award of attorney’s fees in this case.

7                   However, NRS 598.0999(2) is applicable to any action filed pursuant to the provisions  
8 of NRS 598.0903 to 598.0999, inclusive. Accordingly, Margolin should be awarded his  
9 postjudgment fees pursuant to the Deceptive Trade Practices statute.  
10

11                   **a.   NRS 598.0999(2) provides for an award of attorney’s fees**

12                   NRS 598.0999(2) states as follows:

13                   Except as otherwise provided in NRS 598.0974, in any action brought pursuant  
14 to the provisions of NRS 598.0903 to 598.0999, inclusive, if the court finds that  
15 a person has willfully engaged in a deceptive trade practice, the district attorney  
16 of any county in this State or the Attorney General bringing the action may  
17 recover a civil penalty not to exceed \$5,000 for each violation. The court in any  
18 such action may, in addition to any other relief or reimbursement, award  
19 reasonable attorney’s fees and costs.

20                   NRS 598.0999(2) (emphasis added).

21                   Thus, the phrase, “provisions of NRS 598.0903 to 598.0999,” encompasses all actions  
22 brought under those sections. The language, “any action brought pursuant to the provisions of  
23 NRS 598.0903 to 598.0999,” does not limit Deceptive Trade Practices actions to district  
24 attorneys or the Attorney General. The only limitation in NRS 598.0999(2) relates to the  
25 district attorney’s and the Attorney General being able to pursue the \$5,000 civil penalty. In  
26 contrast, the last sentence of NRS 598.0999(2) stands alone and does not limit attorney fee  
27 awards to district attorneys or the Attorney General and allows the Court, in any Deceptive  
28 Trade Practices action, to “award reasonable attorney’s fees and costs.” NRS 598.0999(2).

1 As NRS 598.0999(2) provides for attorney's fees based upon actions filed pursuant to  
2 the provisions of NRS 598.0903 to 598.0999, inclusive, and since NRS 598.0999(2) does not  
3 exclude postjudgment attorney fees, Margolin's attorney's fees are hereby awarded for having  
4 to incur fees enforcing the judgment on the deceptive trade practices claim.

5 **b. Margolin's attorneys' fees are reasonable**

6 "In Nevada, 'the method upon which a reasonable fee is determined is subject to the  
7 discretion of the court,' which 'is tempered only by reason and fairness.'" *Shuette v. Beazer*  
8 *Homes Holdings Corp.*, 124 P. 3d 530, 121 Nev. 837 (2005) (citing *University of Nevada v.*  
9 *Tarkanian*, 110 Nev. 581, 594, 591, 879 P.2d 1180, 1188, 1186 (1994)). "Accordingly, in  
10 determining the amount of fees to award, the court is not limited to one specific approach; its  
11 analysis may begin with any method rationally designed to calculate a reasonable amount,  
12 including those based on a 'lodestar' amount or a contingency fee." *Id.* (citations omitted).  
13 "The lodestar approach involves multiplying 'the number of hours reasonably spent on the  
14 case by a reasonable hourly rate.'" *Id.* at n. 98 (citing *Herbst v. Humana Health Ins. of*  
15 *Nevada*, 105 Nev. 586, 590, 781 P.2d 762, 764 (1989)).

16  
17 Before awarding attorney's fees, the district court must make findings concerning the  
18 reasonableness of the award, as required by *Brunzell v. Golden Gate National Bank*, 455 P.2d  
19 31, 85 Nev. 345 (1969) and *Shuette v. Beazer Homes Holdings Corp.*, 124 P. 3d 530, 121 Nev.  
20 837 (2005). See *Barney v. Mt. Rose Heating & Air Conditioning*, 124 Nev. 821, 829-30, 192  
21 P.3d 730, 735-7 (2008).

22  
23 According to *Brunzell*, the factors that the district court should consider in awarding  
24 attorney fees, with no one factor controlling, is as follows:

- 25  
26 (1) the advocate's qualities, including ability, training, education, experience,  
27 professional standing, and skill;  
28 (2) the character of the work, including its difficulty, intricacy, importance, as  
well as the time and skill required, the responsibility imposed, and the  
prominence and character of the parties when affecting the importance of the  
litigation;

1 (3) the work performed, including the skill, time, and attention given to the  
work; and

2 (4) the result—whether the attorney was successful and what benefits were  
3 derived.

4 *Barney*, 192 P.3d at 736 (citing *Brunzell*, 85 Nev. at 349, 455 P.2d at 33). According to  
5 *Shuette*, the district court is required to “provide[ ] sufficient reasoning and findings in support  
6 of its ultimate determination.” *Id.* (citing *Shuette*, 121 Nev. at 865, 124 P.3d at 549).

7 Margolin concedes that he is not currently entitled to attorney’s fees that are incurred  
8 on appeal. *See Bd. of Gallery of History, Inc. v. Datecs Corp.*, 116 Nev. 286, 288, 994 P.2d  
9 1149, 1150 (2000). However, as stated above, Margolin is entitled to his postjudgment  
10 attorney’s fees, including those incurred in executing on the judgment. Therefore, Margolin is  
11 hereby awarded only those fees that have been incurred, postjudgment, with regards to  
12 execution of the judgment, for a total of \$31,247.50 in fees, which reflects the lodestar amount  
13 of postjudgment attorney’s fees.

14  
15 The amount of attorney’s fees awarded only includes reasonable attorney’s fees from  
16 October 18, 2013 to April 18, 2014, as follows: 11.4 hours of work performed by attorney  
17 Matthew D. Francis at \$300 per-hour (\$3,420.00); 75.3 hours of work performed by attorney  
18 Adam P. McMillen at \$300 per-hour (\$22,590.00); and 41.9 hours of work performed by  
19 paralegal Nancy Lindsley at \$125 per-hour (\$5,237.50). This lodestar amount is reasonable  
20 under the *Brunzell* factors as follows.

21  
22 **(1) Factors 1 and 2 - The Advocate’s Qualities, Including Ability, Training,  
23 Education, Experience, Professional Standing, and Skill and The Novelty  
and Difficulty of The Questions Involved, and The Time and Skill Involved**

24 The issues related to this case included: (a) whether Plaintiff’s patents were entitled to  
25 protection; (b) whether Defendants fraudulently assigned Plaintiff’s patents; and (c), whether  
26 Plaintiff was damaged by Defendants’ conduct. The patent and deceptive trade practices  
27 issues, and the unique facts surrounding them, involved careful consideration and research. In  
28 general, patent and deceptive trade practices litigation is a niche practice that requires a high

1 degree of legal skill and care in order to be performed properly and effectively. Each of these  
2 causes of action, coupled with the unique facts of this matter, required thorough research and  
3 careful analysis.

4 In addition, the postjudgment collection efforts so far have included attempting to find  
5 Zandian's collectible assets, including researching and investigating his property in Nevada  
6 and California and moving for a debtor's examination. Considering Zandian's elusive  
7 behavior to date and elaborate financial arrangements with a multitude of companies and  
8 individuals, Margolin has been forced to incur a significant amount of attorney's fees in  
9 attempting to collect on the judgment.  
10

11 Accordingly, Margolin's claimed postjudgment attorney's fees are reasonable under  
12 these factors.

13 **(2) Factor 3 – The Time and Labor Required**

14 Margolin's counsel has been required to research Zandian's vast real estate holdings in  
15 Nevada. Margolin's counsel has recorded the judgment in each Nevada County where  
16 Zandian holds property. Margolin's counsel has researched and subpoenaed Zandian's  
17 financial information from several financial institutions. Margolin's counsel has moved the  
18 court for a debtor's examination of Zandian. The time and labor required relating to  
19 collections efforts have been reasonable and significant.  
20

21 **(3) Factor 4 - The Result—Whether The Attorney Was Successful And What  
22 Benefits Were Derived**

23 Margolin prevailed on all of his causes of action in this case. Margolin's case against  
24 the Defendants resulted in a Default Judgment being entered against the Defendants on  
25 Margolin's causes of action. Specifically, the Court ordered Defendants to pay Plaintiff  
26 \$1,495,775.74, plus interest. In addition, through postjudgment efforts, Margolin's counsel  
27 has successfully liened Zandian's Nevada real estate to secure the judgment and Margolin's  
28 counsel is in the process of securing appropriate writs of execution to satisfy the judgment.

1 Thus, Margolin obtained the results sought, and this factor weighs in favor of the  
2 reasonableness of Margolin's fee request.

3 Further, the Court finds that while Zandian's failure to appear and defend this action  
4 led to the default judgments being entered, the nature of this matter required specialized skill  
5 and required a significant amount of time and attention by the attorneys involved.

6 The Court finds that patent and deceptive trade practices issues, and the unique facts  
7 surrounding them; involved careful consideration and research. Patent and deceptive trade  
8 practices litigation is a not a routine practice but requires a high degree of legal skill and care  
9 in order to be performed properly and effectively. Each of the causes of action in this matter,  
10 coupled with the unique facts of this matter, required thorough research and careful analysis.  
11 The Court finds that Margolin's counsel billed at an hourly rate of \$300, which is reasonable  
12 for this matter.  
13

14 In summary, an analysis of the *Brunzell* factors proves Margolin's fees in the lodestar  
15 amount of \$31,247.50 are reasonable and are hereby awarded.  
16

### 17 **III. Postjudgment Interest**

18 Margolin seeks a formal judgment for the postjudgment interest accrued on the  
19 judgment to date. Zandian argues it is premature for Margolin to request an order stating what  
20 the current amount of accrued postjudgment interest is at this time. Zandian does not argue  
21 that Margolin is not entitled to postjudgment interest.

22 "The purpose of post-judgment interest is to compensate the plaintiff for loss of the use  
23 of the money awarded in the judgment 'without regard to the elements of which that judgment  
24 is composed.'" *Albert H. Wohlers & Co. v. Bartgis*, 114 Nev. 1249, 1269, 969 P.2d 949, 963  
25 (1998) (citing *Ainsworth v. Combined Ins. Co.*, 105 Nev. 237, 244, 774 P.2d 1003, 1009  
26 (1989); see also *Waddell v. L.V.R.V. Inc.*, 122 Nev. 15, 26, 125 P.3d 1160, 1167 (2006)  
27 ("[t]he purpose of post-judgment interest is to compensate the plaintiff for loss of the use of  
28

1 the money awarded in the judgment' without regard to the various elements that make up the  
2 judgment.”).

3 Since Zandian has not provided a supersedeas bond to stop execution of the judgment,  
4 Margolin is entitled to postjudgment interest until the judgment is satisfied. *See* NRCPC 62(d)  
5 (by giving a supersedeas bond a party may obtain stay of execution); *see also* NRS 17.130(2)  
6 (interest accrues until judgment satisfied). As the original judgment was entered in Nevada  
7 and the judgment set the interest rate at the legal rate of interest according to NRS 17.130, the  
8 interest rate is 5.25 percent per-annum, or \$215.15 per-day. Accordingly, the Court hereby  
9 finds that Margolin is owed simple interest at 5.25 percent or \$215.15 per-day from June 27,  
10 2013, the date of notice of entry of the judgment, through April 18, 2014. It is 296 days from  
11 June 27, 2013 to April 18, 2014. Multiplying 296 days by \$215.15 equals \$63,684.40 in  
12 accrued interest, which is the amount of interest currently due and owing.<sup>1</sup>

#### 14 **IV. Conclusion**

15 Based upon the above, the Motion for Order Allowing Costs and Necessary  
16 Disbursements is GRANTED in full. Therefore, Margolin is awarded his postjudgment costs,  
17 from October 18, 2013 through April 18, 2014, in the amount of \$1,355.17. Margolin is  
18 awarded his postjudgment attorney's fees in the amount of \$31,247.50. Margolin is awarded  
19 his postjudgment interest in the amount of \$63,684.40.

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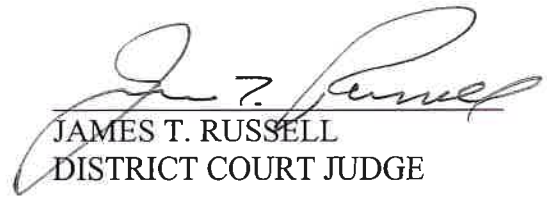
28 <sup>1</sup> Interest continues to accrue until the judgment is satisfied. *See* NRS 17.130(2).



1 The total amount awarded to Margolin herein is \$96,287.07. This award shall be added  
2 to the judgment. This award must be paid before satisfaction of judgment may be entered in  
3 this matter. Payment of this award shall be made within 10 days of notice of entry of this  
4 Order. Payment shall be made payable to the Watson Rounds Trust Account or to Jed  
5 Margolin. Payment shall be delivered to the law office of Watson Rounds.

6 DATED: This 19 day of May, 2014.

IT IS SO ORDERED:

7  
8   
9 JAMES T. RUSSELL  
10 DISTRICT COURT JUDGE  
11  
12  
13  
14  
15

16 Respectfully submitted by,

17 WATSON ROUNDS, P.C.

18 By: \_\_\_\_\_  
19 Adam P. McMillen, Esquire  
20 Nevada Bar No. 10678  
21 5371 Kietzke Lane  
22 Reno, NV 89511  
23 Telephone: (775) 324-4100  
24 Facsimile: (775) 333-8171  
25 Email: amcmillen@watsonrounds.com  
26 Attorneys for Plaintiff  
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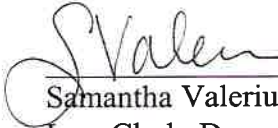
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**CERTIFICATE OF MAILING**

I hereby certify that on the 19<sup>th</sup> day of May, 2014, I placed a copy of the foregoing in the United States Mail, postage prepaid, addressed as follows:

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

Jason D. Woodbury  
Severin A. Carlson  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, NV 89703

  
\_\_\_\_\_  
Samantha Valerius  
Law Clerk, Department I

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 MAY 21 AM 11:15  
ALAN GLOVER  
CLERK  
BY *[Signature]*  
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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

**NOTICE OF ENTRY OF ORDER ON  
MOTION FOR ORDER ALLOWING  
COSTS AND NECESSARY  
DISBURSEMENTS**

TO: All parties:

**PLEASE TAKE NOTICE** that on May 19, 2014 the Court entered its Order on  
Motion for Order Allowing Costs and Necessary Disbursements. A true and correct copy of  
such order is attached hereto as Exhibit 1

**Affirmation Pursuant to NRS 239B.030**

The undersigned does hereby affirm that the preceding document does not contain the

///

///

1 social security number of any person.

2 DATED: May 20, 2014.

WATSON ROUNDS

3  
4 By: 

5 Matthew D. Francis

6 Adam P. McMillen

7 Watson Rounds

8 5371 Kietzke Lane

9 Reno, NV 89511

10 Attorneys for Plaintiff Jed Margolin

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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 ON MOTINO  
5 FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS, addressed as  
6 follows:

7 Jason D. Woodbury  
8 Severin A. Carlson  
9 Kaempfer Crowell  
10 510 West Fourth Street  
11 Carson City, NV 89703

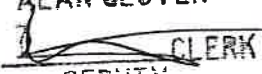
12 Dated: This 20<sup>th</sup> day of May, 2014.

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14 Nancy Lindsley  
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Case No.: 090C00579 1B

Dept. No.: 1

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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.

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

**ORDER ON MOTION FOR ORDER  
ALLOWING COSTS AND  
NECESSARY DISBURSEMENTS  
AND MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT  
THEREOF**

This matter comes before the Court on Plaintiff Jed Margolin's ("Margolin") Motion for Order Allowing Costs and Necessary Disbursements and Memorandum of Points and Authorities in Support Thereof, filed on April 28, 2014. On April 30, 2014, Defendant Reza Zandian ("Zandian") filed a Motion to Retax and Settle Costs, wherein Defendant Zandian addressed Margolin's Motion for Order Allowing Costs and Necessary Disbursements. On May 12, 2014, Zandian served an Opposition to Motion for Order Allowing Costs and

1 Necessary Disbursements, which restates the arguments included in the Motion to Retax. On  
2 May 12, 2014, Margolin filed a Reply in Support of the Motion for Order Allowing Costs and  
3 Necessary Disbursements and Margolin also filed a Request for Submission on the same date.  
4 On May 14, 2014, Margolin filed an Amended Request for Submission, finally submitting the  
5 Motion for Order Allowing Costs and Necessary Disbursements to the Court for decision.

6 Based upon the following facts and conclusions of law, the Motion for Order Allowing  
7 Costs and Necessary Disbursements is hereby GRANTED.

8 **I. Postjudgment Costs**

9 Zandian does not dispute Margolin is allowed postjudgment costs under NRS 18.160  
10 and NRS 18.170. Zandian does not dispute the requested research, witness fees or process  
11 service/courier costs. Zandian only requests that the Court reduce the photocopy charges from  
12 \$0.25 to \$0.15 per page. Zandian relies upon what the "FedEx Office" in Carson City charges  
13 for copies to demonstrate that Margolin's rate of \$0.25 per page is not reasonable.  
14

15 Margolin cites to the First Judicial District Court's own fee schedule for copy charges,  
16 which shows the Court charges \$0.50 per page for copies. The District Court's own fee  
17 schedule is a better exemplar of what reasonable copy charges should be in this matter. The  
18 rate of \$0.25 per page is half of what the Court charges for legal copies and the Court finds  
19 that \$0.25 is reasonable under the circumstances. Therefore, Margolin's copy charges will not  
20 be reduced and are awarded in full in the amount requested. Since Zandian did not oppose the  
21 other costs, Margolin is granted his costs pursuant to NRS 18.160 and NRS 18.170, as follows:  
22

23 COSTS (October 18, 2013 THROUGH April 18, 2014):

24 Postage/photocopies (in-house) \$ 481.20  
25 Research 285.31  
26 Witness Fees (Subpoenas) 215.66  
27 Process service/courier fees 373.00  
28 \$1,355.17

1                   **II. Postjudgment Attorney's Fees**

2                   Zandian argued that there is no applicable statute or rule upon which postjudgment  
3 attorney's fees can be awarded to Margolin and that the parties did not enter into an agreement  
4 which affords attorney's fees and therefore Margolin's request for postjudgment attorney's  
5 fees should be denied. Further, Zandian argues that NRS 598.0999(2) does not permit an  
6 award of attorney's fees in this case.

7                   However, NRS 598.0999(2) is applicable to any action filed pursuant to the provisions  
8 of NRS 598.0903 to 598.0999, inclusive. Accordingly, Margolin should be awarded his  
9 postjudgment fees pursuant to the Deceptive Trade Practices statute.

10                                   **a. NRS 598.0999(2) provides for an award of attorney's fees**

11                   NRS 598.0999(2) states as follows:

12                                   Except as otherwise provided in NRS 598.0974, in any action brought pursuant  
13 to the provisions of NRS 598.0903 to 598.0999, inclusive, if the court finds that  
14 a person has willfully engaged in a deceptive trade practice, the district attorney  
15 of any county in this State or the Attorney General bringing the action may  
16 recover a civil penalty not to exceed \$5,000 for each violation. The court in any  
17 such action may, in addition to any other relief or reimbursement, award  
reasonable attorney's fees and costs.

18 NRS 598.0999(2) (emphasis added).

19                   Thus, the phrase, "provisions of NRS 598.0903 to 598.0999," encompasses all actions  
20 brought under those sections. The language, "any action brought pursuant to the provisions of  
21 NRS 598.0903 to 598.0999," does not limit Deceptive Trade Practices actions to district  
22 attorneys or the Attorney General. The only limitation in NRS 598.0999(2) relates to the  
23 district attorney's and the Attorney General being able to pursue the \$5,000 civil penalty. In  
24 contrast, the last sentence of NRS 598.0999(2) stands alone and does not limit attorney fee  
25 awards to district attorneys or the Attorney General and allows the Court, in any Deceptive  
26 Trade Practices action, to "award reasonable attorney's fees and costs." NRS 598.0999(2).  
27



1 As NRS 598.0999(2) provides for attorney's fees based upon actions filed pursuant to  
2 the provisions of NRS 598.0903 to 598.0999, inclusive, and since NRS 598.0999(2) does not  
3 exclude postjudgment attorney fees, Margolin's attorney's fees are hereby awarded for having  
4 to incur fees enforcing the judgment on the deceptive trade practices claim.

5 **b. Margolin's attorneys' fees are reasonable**

6 "In Nevada, 'the method upon which a reasonable fee is determined is subject to the  
7 discretion of the court,' which 'is tempered only by reason and fairness.'" *Shuette v. Beazer*  
8 *Homes Holdings Corp.*, 124 P. 3d 530, 121 Nev. 837 (2005) (citing *University of Nevada v.*  
9 *Tarkanian*, 110 Nev. 581, 594, 591, 879 P.2d 1180, 1188, 1186 (1994)). "Accordingly, in  
10 determining the amount of fees to award, the court is not limited to one specific approach; its  
11 analysis may begin with any method rationally designed to calculate a reasonable amount,  
12 including those based on a 'lodestar' amount or a contingency fee." *Id.* (citations omitted).  
13 "The lodestar approach involves multiplying 'the number of hours reasonably spent on the  
14 case by a reasonable hourly rate.'" *Id.* at n. 98 (citing *Herbst v. Humana Health Ins. of*  
15 *Nevada*, 105 Nev. 586, 590, 781 P.2d 762, 764 (1989)).

16  
17 Before awarding attorney's fees, the district court must make findings concerning the  
18 reasonableness of the award, as required by *Brunzell v. Golden Gate National Bank*, 455 P.2d  
19 31, 85 Nev. 345 (1969) and *Shuette v. Beazer Homes Holdings Corp.*, 124 P. 3d 530, 121 Nev.  
20 837 (2005). See *Barney v. Mt. Rose Heating & Air Conditioning*, 124 Nev. 821, 829-30, 192  
21 P.3d 730, 735-7 (2008).

22  
23 According to *Brunzell*, the factors that the district court should consider in awarding  
24 attorney fees, with no one factor controlling, is as follows:

- 25  
26 (1) the advocate's qualities, including ability, training, education, experience,  
27 professional standing, and skill;  
28 (2) the character of the work, including its difficulty, intricacy, importance, as  
well as the time and skill required, the responsibility imposed, and the  
prominence and character of the parties when affecting the importance of the  
litigation;

1 (3) the work performed, including the skill, time, and attention given to the  
2 work; and  
3 (4) the result—whether the attorney was successful and what benefits were  
4 derived.

5 *Barney*, 192 P.3d at 736 (citing *Brunzell*, 85 Nev. at 349, 455 P.2d at 33). According to  
6 *Shuette*, the district court is required to “provide[ ] sufficient reasoning and findings in support  
7 of its ultimate determination.” *Id.* (citing *Shuette*, 121 Nev. at 865, 124 P.3d at 549).

8 Margolin concedes that he is not currently entitled to attorney’s fees that are incurred  
9 on appeal. *See Bd. of Gallery of History, Inc. v. Datecs Corp.*, 116 Nev. 286, 288, 994 P.2d  
10 1149, 1150 (2000). However, as stated above, Margolin is entitled to his postjudgment  
11 attorney’s fees, including those incurred in executing on the judgment. Therefore, Margolin is  
12 hereby awarded only those fees that have been incurred, postjudgment, with regards to  
13 execution of the judgment, for a total of \$31,247.50 in fees, which reflects the lodestar amount  
14 of postjudgment attorney’s fees.

15 The amount of attorney’s fees awarded only includes reasonable attorney’s fees from  
16 October 18, 2013 to April 18, 2014, as follows: 11.4 hours of work performed by attorney  
17 Matthew D. Francis at \$300 per-hour (\$3,420.00); 75.3 hours of work performed by attorney  
18 Adam P. McMillen at \$300 per-hour (\$22,590.00); and 41.9 hours of work performed by  
19 paralegal Nancy Lindsley at \$125 per-hour (\$5,237.50). This lodestar amount is reasonable  
20 under the *Brunzell* factors as follows.

21 **(1) Factors 1 and 2 - The Advocate’s Qualities, Including Ability, Training,**  
22 **Education, Experience, Professional Standing, and Skill and The Novelty**  
23 **and Difficulty of The Questions Involved, and The Time and Skill Involved**

24 The issues related to this case included: (a) whether Plaintiff’s patents were entitled to  
25 protection; (b) whether Defendants fraudulently assigned Plaintiff’s patents; and (c), whether  
26 Plaintiff was damaged by Defendants’ conduct. The patent and deceptive trade practices  
27 issues, and the unique facts surrounding them, involved careful consideration and research. In  
28 general, patent and deceptive trade practices litigation is a niche practice that requires a high  
2470

1 degree of legal skill and care in order to be performed properly and effectively. Each of these  
2 causes of action, coupled with the unique facts of this matter, required thorough research and  
3 careful analysis.

4 In addition, the postjudgment collection efforts so far have included attempting to find  
5 Zandian's collectible assets, including researching and investigating his property in Nevada  
6 and California and moving for a debtor's examination. Considering Zandian's elusive  
7 behavior to date and elaborate financial arrangements with a multitude of companies and  
8 individuals, Margolin has been forced to incur a significant amount of attorney's fees in  
9 attempting to collect on the judgment.  
10

11 Accordingly, Margolin's claimed postjudgment attorney's fees are reasonable under  
12 these factors.

13 **(2) Factor 3 – The Time and Labor Required**

14 Margolin's counsel has been required to research Zandian's vast real estate holdings in  
15 Nevada. Margolin's counsel has recorded the judgment in each Nevada County where  
16 Zandian holds property. Margolin's counsel has researched and subpoenaed Zandian's  
17 financial information from several financial institutions. Margolin's counsel has moved the  
18 court for a debtor's examination of Zandian. The time and labor required relating to  
19 collections efforts have been reasonable and significant.  
20

21 **(3) Factor 4 - The Result—Whether The Attorney Was Successful And What  
22 Benefits Were Derived**

23 Margolin prevailed on all of his causes of action in this case. Margolin's case against  
24 the Defendants resulted in a Default Judgment being entered against the Defendants on  
25 Margolin's causes of action. Specifically, the Court ordered Defendants to pay Plaintiff  
26 \$1,495,775.74, plus interest. In addition, through postjudgment efforts, Margolin's counsel  
27 has successfully liened Zandian's Nevada real estate to secure the judgment and Margolin's  
28 counsel is in the process of securing appropriate writs of execution to satisfy the judgment.  
2471

1 Thus, Margolin obtained the results sought, and this factor weighs in favor of the  
2 reasonableness of Margolin's fee request.

3 Further, the Court finds that while Zandian's failure to appear and defend this action  
4 led to the default judgments being entered, the nature of this matter required specialized skill  
5 and required a significant amount of time and attention by the attorneys involved.

6 The Court finds that patent and deceptive trade practices issues, and the unique facts  
7 surrounding them; involved careful consideration and research. Patent and deceptive trade  
8 practices litigation is a not a routine practice but requires a high degree of legal skill and care  
9 in order to be performed properly and effectively. Each of the causes of action in this matter,  
10 coupled with the unique facts of this matter, required thorough research and careful analysis.  
11 The Court finds that Margolin's counsel billed at an hourly rate of \$300, which is reasonable  
12 for this matter.  
13

14 In summary, an analysis of the *Brunzell* factors proves Margolin's fees in the lodestar  
15 amount of \$31,247.50 are reasonable and are hereby awarded.

### 16 **III. Postjudgment Interest**

17 Margolin seeks a formal judgment for the postjudgment interest accrued on the  
18 judgment to date. Zandian argues it is premature for Margolin to request an order stating what  
19 the current amount of accrued postjudgment interest is at this time. Zandian does not argue  
20 that Margolin is not entitled to postjudgment interest.  
21

22 "The purpose of post-judgment interest is to compensate the plaintiff for loss of the use  
23 of the money awarded in the judgment 'without regard to the elements of which that judgment  
24 is composed.'" *Albert H. Wohlers & Co. v. Bartgis*, 114 Nev. 1249, 1269, 969 P.2d 949, 963  
25 (1998) (citing *Ainsworth v. Combined Ins. Co.*, 105 Nev. 237, 244, 774 P.2d 1003, 1009  
26 (1989); see also *Waddell v. L.V.R.V. Inc.*, 122 Nev. 15, 26, 125 P.3d 1160, 1167 (2006)  
27 ("[t]he purpose of post-judgment interest is to compensate the plaintiff for loss of the use of  
28

1 the money awarded in the judgment' without regard to the various elements that make up the  
2 judgment.”).

3 Since Zandian has not provided a supersedeas bond to stop execution of the judgment,  
4 Margolin is entitled to postjudgment interest until the judgment is satisfied. *See* NRCPC 62(d)  
5 (by giving a supersedeas bond a party may obtain stay of execution); *see also* NRS 17.130(2)  
6 (interest accrues until judgment satisfied). As the original judgment was entered in Nevada  
7 and the judgment set the interest rate at the legal rate of interest according to NRS 17.130, the  
8 interest rate is 5.25 percent per-annum, or \$215.15 per-day. Accordingly, the Court hereby  
9 finds that Margolin is owed simple interest at 5.25 percent or \$215.15 per-day from June 27,  
10 2013, the date of notice of entry of the judgment, through April 18, 2014. It is 296 days from  
11 June 27, 2013 to April 18, 2014. Multiplying 296 days by \$215.15 equals \$63,684.40 in  
12 accrued interest, which is the amount of interest currently due and owing.<sup>1</sup>

#### 14 **IV. Conclusion**

15 Based upon the above, the Motion for Order Allowing Costs and Necessary  
16 Disbursements is GRANTED in full. Therefore, Margolin is awarded his postjudgment costs,  
17 from October 18, 2013 through April 18, 2014, in the amount of \$1,355.17. Margolin is  
18 awarded his postjudgment attorney's fees in the amount of \$31,247.50. Margolin is awarded  
19 his postjudgment interest in the amount of \$63,684.40.

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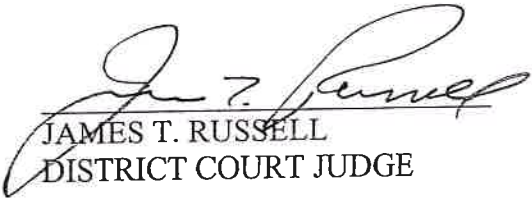
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28 <sup>1</sup> Interest continues to accrue until the judgment is satisfied. *See* NRS 17.130(2).

1 The total amount awarded to Margolin herein is \$96,287.07. This award shall be added  
2 to the judgment. This award must be paid before satisfaction of judgment may be entered in  
3 this matter. Payment of this award shall be made within 10 days of notice of entry of this  
4 Order. Payment shall be made payable to the Watson Rounds Trust Account or to Jed  
5 Margolin. Payment shall be delivered to the law office of Watson Rounds.

6 DATED: This 19 day of May, 2014.

IT IS SO ORDERED:

7  
8   
9 JAMES T. RUSSELL  
10 DISTRICT COURT JUDGE  
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15

16 Respectfully submitted by,

17 WATSON ROUNDS, P.C.

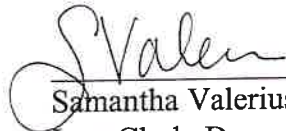
18 By: \_\_\_\_\_  
19 Adam P. McMillen, Esquire  
20 Nevada Bar No. 10678  
21 5371 Kietzke Lane  
22 Reno, NV 89511  
23 Telephone: (775) 324-4100  
24 Facsimile: (775) 333-8171  
25 Email: amcmillen@watsonrounds.com  
26 Attorneys for Plaintiff  
27  
28

CERTIFICATE OF MAILING

I hereby certify that on the 19<sup>th</sup> day of May, 2014, I placed a copy of the foregoing in the United States Mail, postage prepaid, addressed as follows:

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


Jason D. Woodbury  
Severin A. Carlson  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, NV 89703

  
\_\_\_\_\_  
Samantha Valerius  
Law Clerk, Department I

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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](mailto:jwoodbury@kcnvlaw.com)  
**Attorneys for Reza Zandian**

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2014 JUN -9 PM 3:32  
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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 GHONOREZA ZANDIAN JAZI, an  
individual, DOE Companies 1-10, DOE  
Corporations 11-20, and DOE Individuals  
21-30,  
  
Defendants.

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

**NOTICE**

**TO: THE HONORABLE JAMES T. RUSSELL, DISTRICT JUDGE,  
FIRST JUDICIAL DISTRICT COURT OF THE STATE OF  
NEVADA IN AND FOR CARSON CITY;**  
  
**TO: JED MARGOLIN, PLAINTIFF; and**

\\\\\\  
\\\\\\

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703



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**TO: MATTHEW D. FRANCIS  
ADAM P. McMILLEN  
WATSON ROUNDS, ATTORNEYS OF RECORD FOR JED  
MARGOLIN**

On May 19, 2014, this Court issued its *Order on Motion for Order Allowing Costs and Necessary Disbursements and Memorandum of Points and Authorities in Support Thereof* (“*Order*”) in this case. The *Order* awarded the sum of \$96,287.07 in interest, costs and fees to Plaintiff, Jed Margolin. The *Order* states, “Payment of this award shall be made within 10 days of notice of entry of this *Order*.” *Order* at 9:3-4. *Notice of Entry of Order on Motion for Order Allowing Costs and Necessary Disbursements* (“*Notice*”) was served by mail on May 20, 2014. Allowing three days for service, June 9, 2014 is the tenth judicial day from service of the *Notice*, and the date the *Order* calls for payment.

Defendant, REZA ZANDIAN (“ZANDIAN”), by and through his attorneys of record, KAEMPFER CROWELL, hereby provides notice that he is unable to pay the sum of \$96,287.07 as ordered by this Court. It is respectfully submitted that notice of

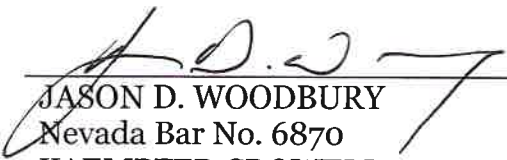
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1 ZANDIAN's inability to pay is presented in good faith and not for the purpose of delay or  
2 any other improper purpose in this matter.

3 DATED this 9<sup>th</sup> day of June, 2014.

4 KAEMPFER CROWELL RENSHAW  
5 GRONAUER & FIORENTINO

6 BY:

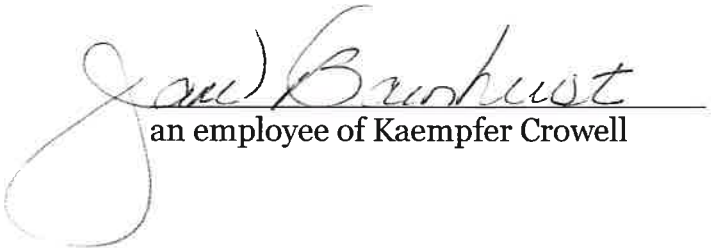
  
7 JASON D. WOODBURY  
8 Nevada Bar No. 6870  
9 KAEMPFER CROWELL  
10 510 West Fourth Street  
11 Carson City, Nevada 89703  
12 Telephone: (775) 884-8300  
13 Facsimile: (775) 882-0257  
14 [jwoodbury@kcnvlaw.com](mailto:jwoodbury@kcnvlaw.com)  
15 ***Attorneys for Reza Zandian***

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRAP 25(d) and NRCP 5(b), I hereby certify that service of the  
3 foregoing **NOTICE** was made this date by depositing a true copy of the same for mailing  
4 at Carson City, Nevada, first class postage pre-paid, 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 9 day of June, 2014.

11   
12 an employee of Kaempfer Crowell

ORIGINAL

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*

REC'D & FILED

2014 JUN 18 PM 3:34

BY *Alan Glover* 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.

Case No.: 090C00579 1B

Dept. No.: 1

**MOTION FOR WRIT OF  
EXECUTION**

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

**POINTS AND AUTHORITIES**

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

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

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

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

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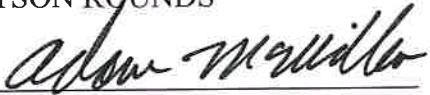
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**AFFIRMATION PURSUANT TO NRS 239B.030**

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

DATED: June 17, 2014.

WATSON ROUNDS

By: 

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*

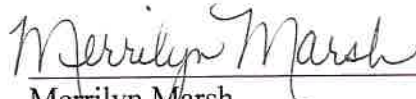
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**CERTIFICATE OF SERVICE**

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, MOTION FOR WRIT OF EXECUTION, 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: June 18, 2014

  
\_\_\_\_\_  
Merylyn Marsh

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**INDEX OF EXHIBITS**

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



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*  
5

6  
7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**  
9

10  
11 JED MARGOLIN, an individual,  
12 Plaintiff,

13 vs.

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

21 Defendants.  
22

Case No.: 090C00579 1B

Dept. No.: 1

**SECOND MEMORANDUM  
OF POST-JUDGMENT  
COSTS AND FEES**

23 Judgment having been entered in the above entitled action on June 24, 2013 and a  
24 separate order allowing post judgment fees and costs entered on May 19, 2014, against  
25 Defendants, jointly and severally, Plaintiff Jed Margolin, by and through his counsel of record,  
26 Adam P. McMillen, Esquire of Watson Rounds, P.C., submits Plaintiff's Second  
27  
28

1 Memorandum of Post-Judgment Costs and Fees and requests the Clerk tax such costs and fees,  
2 as follows:

3 POST-JUDGMENT ATTORNEYS' FEES  
4 (October 18, 2013 to April 18, 2014) . . . . . \$31,247.50

5 POST-JUDGMENT COSTS  
6 (October 18, 2013 to April 18, 2014):

7 Postage/photocopies (in-house) \$ 481.20  
8 Research 285.31  
9 Witness Fees (Subpoenas) 215.66  
Process service/courier fees 373.00  
\$1,355.17

10 POST-JUDGMENT INTEREST  
11 (June 27, 2013 to April 18, 2014): . . . . . \$63,684.40

12 **TOTAL:** **\$96,287.07**

13 **AFFIRMATION Pursuant to NRS 239B.030**

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

16  
17 DATED: June 17, 2014.

WATSON ROUNDS, P.C.

18  
19 BY: 

20 Matthew D. Francis (6978)  
21 Adam P. McMillen (10678)  
22 WATSON ROUNDS  
23 5371 Kietzke Lane  
24 Reno, NV 89511  
25 Telephone: 775-324-4100  
26 Facsimile: 775-333-8171  
27 *Attorneys for Plaintiff Jed Margolin*  
28

**DECLARATION OF ADAM P. McMILLEN**

I, ADAM P. McMILLEN, declare under the penalty of perjury that the foregoing costs and fees are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed.

DATED: June 17, 2014.

  
\_\_\_\_\_  
ADAM P. McMILLEN  
Attorney for Plaintiff Jed Margolin

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8 *Attorneys for Plaintiff Jed Margolin*

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

11  
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 Companies  
24 1-10, DOE Corporations 11-20, and DOE  
25 Individuals 21-30,

26 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

27 **THE PEOPLE OF THE STATE OF NEVADA:**

28 To the Sheriff of Washoe County, Greetings:

On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,497,329.10 the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$31,247.50 attorney's fees,  
9 \$63,684.40 accrued interest, and  
10 \$1,355.17 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$96,287.07 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,593,616.17 actually due on the date of the issuance of this writ of which  
17 \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 following real property belonging to the debtor in the said county, and make return to this writ  
23 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24 ///

25 ///

Debtor's real property in Washoe County is described as follows:

Washoe County APN: 079-150-09  
Situs: State Route 447  
Legal Description: The Northeast ¼ and the South ½ of the Northwest ¼  
and the South ½ in Section 33, Township 21, Range 23  
East, M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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4 5371 Kietzke Lane  
5 Reno, NV 89511  
6 Telephone: 775-324-4100  
7 Facsimile: 775-333-8171  
8 *Attorneys for Plaintiff Jed Margolin*

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

11  
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 Companies  
24 1-10, DOE Corporations 11-20, and DOE  
25 Individuals 21-30,

26 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

27 **THE PEOPLE OF THE STATE OF NEVADA:**

28 To the Sheriff of Washoe County, Greetings:

On June 24, 2013, a judgment was entered by the above entitled Court in the above-entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants, jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,497,329.10 the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$31,247.50 attorney's fees,  
9 \$63,684.40 accrued interest, and  
10 \$1,355.17 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$96,287.07 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,593,616.17 actually due on the date of the issuance of this writ of which  
17 \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 following real property belonging to the debtor in the said county, and make return to this writ  
23 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24 ///

25 ///



Debtor's real property in Washoe County is described as follows:

Washoe County APN: 079-150-10  
Situs: State Route 447  
Legal Description: Section 31, Township 21 North, Range 23 East,  
M.D.B.&M

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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

5  
6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**  
10

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

23 **THE PEOPLE OF THE STATE OF NEVADA:**

24 To the Sheriff of Washoe County, Greetings:

25  
26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00

principal,

2 \$83,761.25

attorney's fees

3 \$488,545.89

interest, and

4 \$25,021.96

costs, making a total amount of

5 \$1,497,329.10

the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$31,247.50

attorney's fees,

9 \$63,684.40

accrued interest, and

10 \$1,355.17

accrued costs, together with a \$10.00 fee for the issuance of this writ, making a

11 total of:

12 \$96,287.07

as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,593,616.17 actually due on the date of the issuance of this writ of which

17 \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day

18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY,** you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 following real property belonging to the debtor in the said county, and make return to this writ  
23 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24 ///

25 ///

Debtor's real property in Washoe County is described as follows:

Washoe County APN: 079-150-12  
Situs: State Route 447  
Legal Description: The Southwest Quarter (SW ¼) of Section 25, Township  
21 North, Range 23 East, M.D.M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00

principal,

2 \$83,761.25

attorney's fees

3 \$488,545.89

interest, and

4 \$25,021.96

costs, making a total amount of

5 \$1,497,329.10

the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$31,247.50

attorney's fees,

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accrued interest, and

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accrued costs, together with a \$10.00 fee for the issuance of this writ, making a

11 total of:

12 \$96,287.07

as accrued costs, accrued interest, and fees.

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16 \$1,593,616.17 actually due on the date of the issuance of this writ of which

17 \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day

18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY,** you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 following real property belonging to the debtor in the said county, and make return to this writ  
23 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24 ///

25 ///

Debtor's real property in Washoe County is described as follows:

Washoe County APN: 079-150-13  
Situs: State Route 447  
Legal Description: The Northeast ¼; South ½ of the Northwest ¼; South ½  
of Section 27, Township 21 North, Range 23 East,  
M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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*Attorneys for Plaintiff Jed Margolin*

5  
6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**

10  
11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

23 **THE PEOPLE OF THE STATE OF NEVADA:**

24 To the Sheriff of Washoe County, Greetings:

25  
26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:





Debtor's real property in Washoe County is described as follows:

Washoe County APN: 084-040-02  
Situs: Pierson Canyon Road  
Legal Description: Section 5, Township 20 North, Range 23 East,  
M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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7 Facsimile: 775-333-8171  
8 *Attorneys for Plaintiff Jed Margolin*

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

11  
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 Companies  
24 1-10, DOE Corporations 11-20, and DOE  
25 Individuals 21-30,

26 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

27 **THE PEOPLE OF THE STATE OF NEVADA:**

28 To the Sheriff of Washoe County, Greetings:

On June 24, 2013, a judgment was entered by the above entitled Court in the above-entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants, jointly and severally as Judgment Debtor for:



Debtor's real property in Washoe County is described as follows:

Washoe County APN: 084-040-04  
Situs: E Interstate 80  
Legal Description: Section 3, Township 20 North, Range 23 East,  
M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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6 Telephone: 775-324-4100  
7 Facsimile: 775-333-8171  
8 *Attorneys for Plaintiff Jed Margolin*

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

11  
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 Companies  
24 1-10, DOE Corporations 11-20, and DOE  
25 Individuals 21-30,  
26 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

23 **THE PEOPLE OF THE STATE OF NEVADA:**

24 To the Sheriff of Washoe County, Greetings:

25  
26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:



Debtor's real property in Washoe County is described as follows:

Washoe County APN: 084-040-06  
Situs: E Interstate 80  
Legal Description: Section 1, Township 20 North, Range 23 East,  
M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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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*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

23 **THE PEOPLE OF THE STATE OF NEVADA:**  
24

To the Sheriff of Washoe County, Greetings:

25  
26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:



Debtor's real property in Washoe County is described as follows:

Washoe County APN: 084-040-10  
Situs: E Interstate 80  
Legal Description: The North ½ and the North ½ of the Northwest ¼ of the Southwest ¼ and the Southwest ¼ of the Northwest ¼ of the Southwest ¼ and the North ½ of the Northeast ¼ of the Southwest ¼ and the North ½ of the Northwest ¼ of the Southeast ¼ all in Section 11, Township 20 North, Range 23 East, M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,

13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1        \$900,000.00        principal,  
2        \$83,761.25        attorney's fees  
3        \$488,545.89        interest, and  
4        \$25,021.96        costs, making a total amount of  
5        \$1,497,329.10       the judgment as entered, and

6                WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8        \$31,247.50       attorney's fees,  
9        \$63,684.40       accrued interest, and  
10       \$1,355.17       accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11                total of:  
12        \$96,287.07       as accrued costs, accrued interest, and fees.

13                Credit must be given for payments and partial satisfactions in the amount of  
14        \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15        excess credited against the judgment as entered, leaving a net balance of:

16        \$1,593,616.17 actually due on the date of the issuance of this writ of which  
17        \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day  
18        from the date of judgment to the date of levy, to which must be added the commissions and  
19        costs of the officer executing this writ.

20                **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY,** you are hereby  
21        commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22        following real property belonging to the debtor in the said county, and make return to this writ  
23        within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24        ///

25        ///

Debtor's real property in Washoe County is described as follows:

Washoe County APN: 084-130-07  
Situs: E Interstate 80  
Legal Description: The Northwest ¼ and the North ½ of the Southwest ¼  
and the Government Lot 1 in the Southwest ¼ of Section  
15, Township 20 North, Range 23 East, M.D.B.&M.

DATED: this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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1 Matthew D. Francis (6978)  
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3 Reno, NV 89511  
Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,497,329.10 the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$31,247.50 attorney's fees,  
9 \$63,684.40 accrued interest, and  
10 \$1,355.17 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$96,287.07 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,593,616.17 actually due on the date of the issuance of this writ of which  
17 \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 following real property belonging to the debtor in the said county, and make return to this writ  
23 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24 ///  
25 ///  
26



Debtor's real property in Washoe County is described as follows:

Washoe County APN: 084-140-17  
Situs: E Interstate 80  
Legal Description: The Northeast ¼ of Section 15, Township 20 North,  
Range 23 East, M.D.B.&M.

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*

5  
6  
7  
8 **In The First Judicial District Court of the State of Nevada**  
9 **In and for Carson City**

10  
11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

23 **THE PEOPLE OF THE STATE OF NEVADA:**

24 To the Sheriff of Washoe County, Greetings:

25  
26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1 \$900,000.00 principal,  
2 \$83,761.25 attorney's fees  
3 \$488,545.89 interest, and  
4 \$25,021.96 costs, making a total amount of  
5 \$1,497,329.10 the judgment as entered, and

6 WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8 \$31,247.50 attorney's fees,  
9 \$63,684.40 accrued interest, and  
10 \$1,355.17 accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11 total of:  
12 \$96,287.07 as accrued costs, accrued interest, and fees.

13 Credit must be given for payments and partial satisfactions in the amount of  
14 \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15 excess credited against the judgment as entered, leaving a net balance of:

16 \$1,593,616.17 actually due on the date of the issuance of this writ of which  
17 \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day  
18 from the date of judgment to the date of levy, to which must be added the commissions and  
19 costs of the officer executing this writ.

20 **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
21 commanded to satisfy this judgment with interest and costs as provided by law, out of the  
22 following real property belonging to the debtor in the said county, and make return to this writ  
23 within not less than 10 days or more than 60 days endorsed thereon with what you have done.

24 ///

25 ///

Debtor's real property in Clark County is described as follows:

Clark County APN: 071-02-000-005  
Situs: Moapa Valley  
Legal Description: PT NE4 NE4 SEC 02 16 68  
Section 02, Township 16, Range 68

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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Telephone: 775-324-4100  
4 Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*  
5  
6  
7

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

11  
12 JED MARGOLIN, an individual,  
13 Plaintiff,

14 vs.

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

22 Defendants.  
23

Case No.: 090C00579 1B

Dept. No.: 1

**WRIT OF EXECUTION**

24 **THE PEOPLE OF THE STATE OF NEVADA:**

25 To the Sheriff of Washoe County, Greetings:

26 On June 24, 2013, a judgment was entered by the above entitled Court in the above-  
27 entitled action in favor of Plaintiff Jed Margolin as Judgment Creditor and against Defendants,  
28 jointly and severally as Judgment Debtor for:

1       \$900,000.00       principal,  
2       \$83,761.25       attorney's fees  
3       \$488,545.89       interest, and  
4       \$25,021.96       costs, making a total amount of  
5       \$1,497,329.10     the judgment as entered, and

6               WHEREAS, according to an affidavit or a memorandum of costs after judgment, or  
7 both, filed herein, it appears that further sums have accrued since the entry of judgment, to wit:

8       \$31,247.50     attorney's fees,  
9       \$63,684.40     accrued interest, and  
10       \$1,355.17     accrued costs, together with a \$10.00 fee for the issuance of this writ, making a  
11               total of:  
12       \$96,287.07     as accrued costs, accrued interest, and fees.

13               Credit must be given for payments and partial satisfactions in the amount of  
14       \$0.00 which is to be first credited against the total accrued costs and accrued interest, with any  
15       excess credited against the judgment as entered, leaving a net balance of:

16       \$1,593,616.17 actually due on the date of the issuance of this writ of which  
17       \$1,593,616.17 bears interest at 5.25% percent per annum, in the amount of \$229.22 per day  
18       from the date of judgment to the date of levy, to which must be added the commissions and  
19       costs of the officer executing this writ.  
20

21               **NOW, THEREFORE, SHERIFF OF WASHOE COUNTY**, you are hereby  
22       commanded to satisfy this judgment with interest and costs as provided by law, out of the  
23       following real property belonging to the debtor in the said county, and make return to this writ  
24       within not less than 10 days or more than 60 days endorsed thereon with what you have done.  
25

26       ///  
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29

Debtor's real property in Clark County is described as follows:

Clark County APN:

071-02-000-013

Situs:

Moapa Valley

Legal Description:

PT SE4 NE4 SEC 02 16 68

Section 02, Township 16, Range 68

DATED: this \_\_\_\_ day of \_\_\_\_\_, 2014.

ALAN GLOVER, Clerk

By: \_\_\_\_\_, Deputy

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