

IN THE SUPREME COURT OF THE STATE OF NEVADA

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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 XII

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**

**INDEX**

<b>DESCRIPTION</b>	<b>STAMPED PAGE NO.</b>	<b>VOL. NO.</b>
AFFIDAVIT OF JUDGMENT	3548	15
AFFIDAVIT OF POSTING NOTICE OF SHERIFF'S SALE OF REAL PROPERTY UNDER EXECUTION (2)	2652	11
AFFIDAVIT OF PUBLICATION OF NOTICE OF SHERIFF'S SALE OF REAL PROPERTY UNDER EXECUTION	2664, 2669	11
AFFIDAVIT OF RENEWAL OF JUDGMENT	3498	14
AFFIDAVIT OF SERVICE	991, 1092	4, 5
AFFIDAVIT OF SEVERIN A. CARLSON IN SRESPONSE TO AMENDED ORDER GRANTING MOTION TO WITHDRAW	3081	13
AMENDED CERTIFICATE OF SERVICE	416	2
AMENDED COMPLAINT	376	2
AMENDED NOTICE OF ENTRY OF DEFAULT	1177	5
AMENDED ORDER ALLOWING SERVICE BY PUBLICATION	390	2
AMENDED ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL	3064	13
AMENDED REQUEST FOR SUBMISSION	2450	10
AMENDED WARRANT OF ARREST	3508	15
APPICATION FOR ENTRY OF DEFAULT	23, 24, 25	1
APPLICATION FOR DEFAULT JUDGMENT; MEMORANDUM OF POINTS AN DAUTHORITIES IN SUPPORT THEREOF	132, 992, 1182	1, 4, 5
APPLICATION FOR ENTRY OF DEFAULT	962	4
CASE APPEAL STATEMENT	1577, 2542, 3003, 3545	7, 11, 13, 15
CERTIFICATE OF SERVICE	44, 399	1, 2

CERTIFICATE OF SERVICE OF AFFIDAVITS OF POSTING NOTICE OF SHERIFF'S SALE OF REAL PROPERTY UNDER EXECUTION	2673	11
CLERK'S CERTIFICATE	2998, 3159	12,13
COMPLAINT	1	1
DECISION OF ARBITRATION COMMISSIONER REMOVING MATTER FROM MANDATORY ARBITRATION	933	4
DECLARATION FO ADAM P. MCMILLEN	3117	13
DECLARATION FO JED MARGOLIN IN SUPPOR TO FAPPLICATION FOR DEFAULT JUDGMENT	88	1
DECLARATION OF ADAM MCMILLEN IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENS	2324	10
DECLARATION OF ADAM MCMILLEN IN SUPPORT OF REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS	2417	10
DECLARATION OF ADAM P MCMILLEN IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT	1047, 1195	5
DECLARATION OF ADAM P. MCMILLEN	773	4
DECLARATION OF ADAM P. MCMILLEN IN SUPPORT OF PLAINTIFF'S APPLICATION FOR ATTORNEY'S FEES AND COSTS	1143	5
DECLARATION OF ADAM P. MCMILLEN IN SUPPORT OF PLAINTIFF'S MOTION FOR SANCTIONS UNDER NRCP 37	1100	5
DECLARATION OF ADAM P. MCMILLEN IN SUPPORT OF THE NOTICE OF NON-OPPOSITION TO JOHN PETER LEE, LTD'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION	843	4
DECLARATION OF ADAM P. MCMILLEN IN SUPPORT OF THE NOTICE OF NON-OPPOSITION TO JOHN PETER LEE, LTD'S MOTION TO WITHDRAW FROM REPRESENTATION	830	4
DECLARATION OF CASSANDRA P. JOSEPH IN SUPPOR TOF APPLICATION FOR DEFAULT JUDGMENT	47	1
DECLARATION OF JED MARGOLIN IN SUPPORT OF APPLICATION FOR DEFAULT JUDGMENT	1002, 1200	5



DECLARATION OF JED MARGOLIN IN SUPPORT OF MOTION TO STRIKE	763	4
DECLARATION OF JED MARGOLIN IN SUPPORT OF REQUEST TO EXEMPT CASE FROM COURT ANNEXED ARBITRATION PROGRAM	924	4
DECLARATION OF MAILING	1157	5
DECLARATION OF SERVICE	2685	11
DEFAULT	26, 27, 28, 973	1, 4
DEFAULT JUDGMENT	143, 1082, 1159, 1248	1, 5
DEFENDANT REZA ZANDIAN'S OPPOSITION TO PLAINTIFF'S MOTION FOR JUDGMENT DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS AND MOTION FOR PROTECTIVE ORDER	2717	11, 12
DEFENDANT REZA ZANDIAN'S REPLY IN SUPPORT OF MOTION FOR PROTECTION ORDER	2948	12
DEFENDANT REZA ZANDIAN'S REPLY IN SUPPORT OF MOTION FOR STAY OF PROCEEDINGS TO ENFORCE JUDGMENT PURSUAN TO NRCP 62(B)	1472	6
DEFENDANT REZA ZANIAN AKA GOLAMREZ ZANDIANJAZI AKA GHOLAM REZA ZANDIAN AKA REZA JAZI AKA J. REZA JAZI AKA G. REZA JAZI AKA GHONONREZA ZANDIAN JAZI'S MOTION FOR STAY OF PROCEEDINGS TO ENFORCE JUDGMENT PURSUANT TO NRCP 62(B)	1342	6
DEFENDANT REZA ZANIAN AKA GOLAMREZ ZANDIANJAZI AKA GHOLAM REZA ZANDIAN AKA REZA JAZI AKA J. REZA JAZI AKA G. REZA JAZI AKA GHONONREZA ZANDIAN JAZI'S MOTION TO SET ASIDE DEFAULT JUDGMENT	1325	6
DEFENDANT ZANDIAN'S REPLY IN SUPPORT OF MOTION TO SET ASIDE DEFAULT JUDGMENT	1455	6
DEFENDANTS' MOTION TO RETAX AND SETTLE COSTS	2399	10
ERRATA TO MOTION TO WITHDRAW AS COUNSEL	3022	13
FIRST MEMORANDUM OF POST-JUDGMENT COSTS AND FEES	2290	10
GENERAL DENIAL	824	4

JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, NEVADA CORPORATION; AND REZA ZANDIAN, aka GOLAMREZA ZANDLANJAZI aka GHOLAM REZA ZANDIAN aka REZ JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI	818	4
JOHN PETER LEE, LTD.'S MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANT REZA ZANDIAN, aka GOLAMREZA ZANDLANJAZI aka GHOLAM REZA ZANDIAN aka REZ JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI	804	4
MOTION	1600	7, 8, 9
MOTION FOR EXTENSION OF TIME TO FILE TRIAL COURT RECORD	3554	15
MOTION FOR JUDGMENT DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS	1258, 2707	6, 11
MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPOR THEREOF	2316	10
MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT	1503	7
MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT AND EX PARTE MOTIONFOR ORDER SHORTENING TIME	3090	13
MOTION FOR WRIT OF EXECUTION	2244, 1480	9, 10
MOTION TO DISMISS AMENDED COMPLAITN ON SPECIAL APPEARANCE	418	2, 3
MOTION TO DISMISS ON A SPECIAL APPEARANCE	153	1
MOTION TO RETAX AND SETTLE COSTS	2294	10
MOTION TO SERVE BY PUBLICATION	323	2
MOTION TO STRIKE	721	3, 4
MOTION TO STRIKE, IN PART, REPLY IN SUPPORT OF MOTION FOR WRIT OF EXECUTION	2604	11
MOTION TO VOID DEEDS, ASSIGN PROPERTY, FOR WRIT OF EXECUTION AN DTO CONVEY	3162	13, 14

MOTION TO WITHDRAW AS COUNSEL	3012	13
NOTICE	2476	10
NOTICE OF APPEAL	193, 1568, 2524, 3000	1, 7, 11, 13
NOTICE OF APPEAL	3539	15
NOTICE OF APPEARANCE	193, 1322	1, 6
NOTICE OF BANKRUPTCY FILING AND AUTOMATIC STAY	3491	14
NOTICE OF CASH DEPOSIT IN LIEU OF BOND	1585, 2549	7, 11
NOTICE OF CHANGE OF COUNSEL	195	1
NOTICE OF CHANGE OF FIRM AFFILIATION	2968	12
NOTICE OF DISASSOCIATION OF COUNSEL	3495	14
NOTICE OF ENTRY OF AMENDED ORDER	393	2
NOTICE OF ENTRY OF AMENDED ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL	3074	13
NOTICE OF ENTRY OF DEFAULT	29, 34, 39, 980	1, 4
NOTICE OF ENTRY OF DEFAULT	1172	5
NOTICE OF ENTRY OF DEFAULT JUDGMENT	146, 1251	1, 6
NOTICE OF ENTRY OF JUDGMENT	1085	5
NOTICE OF ENTRY OF ORDER	380, 793, 954, 1137	2, 4, 5
NOTICE OF ENTRY OF ORDER	1166, 1489, 2615, 2985	5, 6, 11, 12
NOTICE OF ENTRY OF ORDER	3467, 3529	14, 15
NOTICE OF ENTRY OF ORDER GRANTING JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, NEVADA CORPORATION; AND REZA ZANDIAN, aka GOLAMREZA ZANDLANJAZI aka GHOLAM REZA ZANDIAN aka REZ JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI	913	4

NOTICE OF ENTRY OF ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL	3067	13
NOTICE OF ENTRY OF ORDER GRANTING PLAINTIFF'S MOTION FOR DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS	1447	6
NOTICE OF ENTRY OF ORDER ON MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS	2463	10
NOTICE OF INTENT TO TAKE DEFAULT	809	4
NOTICE OF NON-OPPOSITION TO JOHN PETER LEE, LTD'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION	840, 827,	4
NOTICE OF PENDENCY OF CHAPTER 15 PETITION FOR RECOGNITION OF A FOREIGN PROCEEDING	3473	14
NOTICE OF REQUEST FOR TRANSCRIPT OF PROCEEDINGS	3056	13
NOTICE OF SHERIFF'S SALE OF REAL PROPERTY UNDER EXECUTION (2)	2646	11
NOTICE OF TAKING DEBTOR'S EXAMINATION OF DEFENDANT REZA ZANDIAN	3109	13
NOTICE OF TERMINATION FO BANKRUPTCY PROCEEDINGS	3511	15
NOTICE TO VACATE DEPOSITION	3464	14
OPPOSITION TO MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSEMENTS	2441	10
OPPOSITION TO MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT	1529	7
OPPOSITION TO MOTION FOR STAY OF PROCEEDINGS TO ENFORCE JUDGMENT PURSUANT OT NRCP 62(B)	1443	6
OPPOSITION TO MOTION FOR WRIT OF EXECUTION	2307, 2553	10, 11
OPPOSITION TO MOTION TO DISMISS	517	3
OPPOSITION TO MOTION TO DISMISS AND COUNTERMOTIONS TO STRIKE AND FOR LEAVE TO AMEND THE COMPLAINT	197	1, 2

OPPOSITION TO MOTION TO SET ASIDE DEFAULT JUDGMENT	1349	6
OPPOSITION TO MOTION TO STRIKE	767	4
OPPOSITION TO MOTION TO STRIKE, IN PART, REPLY IN SUPPORT OF MOTION FOR WRIT OF EXECUTION	2624	11
OPPOSITION TO MOTION TO WITHDRAW AS COUNSEL	3025	13
ORDER ALLOWING SERVICE BY PUBLICATION	387	2
ORDER DEFENDANT REZA ZANIAN AKA GOLAMREZ ZANDIANJAZI AKA GHOLAM REZA ZANDIAN AKA REZA JAZI AKA J. REZA JAZI AKA G. REZA JAZI AKA GHONONREZA ZANDIAN JAZI'S MOTION TO SET ASIDE DEFAULT JUDGMENT	1479	6
ORDER DENYING DEFENDANT'S MOTION TO DISMISS	792	4
ORDER DENYING MOTION TO STRIKE	791	4
ORDER DENYING REQUEST FOR SUBMISSION	1599.4	7
ORDER DIRECTING TRANSMISSION OF RECORD	3553	15
ORDER DISMISSING APPEAL	3154, 3157	13
ORDER GRANTING DEFENDANT ZANDIAN'S REQUET TO FILE A SUR-REPLY	2621	11
ORDER GRANTING JOHN PETER LEE, LTD.'S AMENDED MOTION TO WITHDRAW FROM REPRESENTATION OF DEFENDANTS OPTIMA TECHNOLOGY CORPORATION, A CALIFORNIA CORPORATION; OPTIMA TECHNOLOGY CORPORATION, NEVADA CORPORATION; AND REZA ZANDIAN, aka GOLAMREZA ZANDLANJAZI aka GHOLAM REZA ZANDIAN aka REZ JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI	910	4
ORDER GRANTING MOTION TO WITHDRAAW AS COUNSEL	3054	13
ORDER GRANTING PLAINITFF'S MOTION FOR DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS	1439	6
ORDER GRANTING PLAINTIFF'S APPLICATION FOR ATTORNEY'S FEES AND COSTS	1164	5
ORDER GRANTING PLAINTIFF'S MOTION FOR DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS	2981	12

ORDER GRANTING PLAINTIFF'S MOTION FOR DEPOSITION OF ALBORZ ZANDIAN	3160	13
ORDER GRANTING PLAINTIFF'S MOTION FOR SANCTIONS UNDER NRCP 37	1134	5
ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL APPEARANCE OF COUNSEL FOR OPTIMA TECHNOLOGY CORPORATIONS, OR IN THE ALTERNATIVE, MOTION TO STRIKE GENERAL DENIAL OF OPTIMA TECHNOLOGY CORPORATIONS	950	4
ORDER GRANTING PLAINTIFF'S MOTION TO VOID DEEDS, ASSIGN PROPERTY, FOR WRIT OF EXECUTION AND TO CONVEY	3524	15
ORDER HOLDING DEFENDANT IN CONTEMPT OF COURT	3112	13
ORDER OF AFFIRMANCE	2978, 2995	12
ORDER ON MOTION FOR RODER ALLOWING COSTS AND NECESSARY DISBURSEMENTS AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF	2453	10
ORDER RE: WRIT OF EXECUTION	2643	11
ORDER RELEASING FUNDS	3506	15
ORDER SETTING ASIDE DEFAULT, DENYING MOTION TO DISMISS AND GRANTING EXTENSION OF TIME FOR SERVICE	319	2
ORDER TO SET FOR HEARING	2974	12
ORDER TO SHOW CAUSE	3106	13
PLAINTIFF'S APPLICATION FOR ATTORNEY'S FEES AND COSTS	1151	5
PLAINTIFF'S MOTION FOR SANCTIONS UNDER NRCP 37	1093	5
PLAINTIFF'S MOTION TO COMPEL APPEARANCE OF COUNSEL FOR OPTIMA TECHNOLOGY CORPORATIONS, OR IN THE ALTERNATIVE, MOTION TO STRIKE GENERAL DENIAL OF OPTIMA TECHNOLOGY CORPORATIONS	928	4
RECEIPT	2552, 3011, 3494, 3510	11, 13, 14, 1
REMITTITUR	2993, 3156	12, 13

REPLY IN SUPPORT OF MOTION FOR JUDGMENT DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS AND OPPOSITION TO DEFENDANT REZA ZANDIAN'S MOTION FOR MOTION FOR PROTECTIVE ORDER	2773	12
REPLY IN SUPPORT OF MOTION FOR ORDER ALLOWING COSTS AND NECESSARY DISBURSMENT AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF	2410	10
REPLY IN SUPPORT OF MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT	1588	7
REPLY IN SUPPORT OF MOTION FOR WRIT OF EXECUTION	2560	11
REPLY IN SUPPORT OF MOTION FOR WRIT OF EXECUTION AN DOPPSITION TO MOTINO TO RETAX AND SETTLE COSTS	2313	10
REPLY IN SUPPORT OF MOTION TO STRIKE	770	4
REPLY TO OPPOSITION TO MOTION TO DISMISS	714	3
REPLY TO OPPOSITION TO MOTION TO DISMISS ON A SPECIAL APPEARANCE	312	2
REQUEST FOR EXEMPTION FROM ARBITRATION	812	4
REQUEST FOR HEARING ON MOTION FOR JUDGMENT DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS (FJDCR, Rule 15)	2965	12
REQUEST FOR SUBMISSION	316, 384, 387, 907	2, 4
REQUEST FOR SUBMISSION	936, 1131, 1161, 1245	4, 5
REQUEST FOR SUBMISSION	1436, 1599.1, 2438, 2612	6, 7, 10, 11
REQUEST FOR SUBMISSION	2640, 2971, 3051, 3100	11, 12, 13
REQUEST FOR SUBMISSION	3488, 3521	14, 15
REQUEST FOR SUBMISSION (2)	786	4
REQUEST FOR SUBMISSION AND HEARING ON DEFENDANT REZA ZANDIAN'S MOTION TO SET ASIDE DEFAULT JUDGMENT	1469	6

SECOND SUPPLEMENTAL REQUEST FOR EXEMPTION FROM ARBITRATION	918	4
SHERIFF'S CERTIFICATE OF SALE OF REAL PROPERTY (2)	2681	11
STIPULATION AND ORDER TO WITHDRAW MOTION FILED BY REZ ZANDIAN ON MARCH 24, 2014	2303	10
SUBSTITUTION OF COUNSEL	1526	7
SUMMONS	11	1
SUMMONS AND ADD'L SUMMONS	15	1
SUMMONS ON AMENDED COMPLAINT AND ADD'L SUMMONS (2)	401	2
SUPPLEMENTAL REQUEST FOR EXEMPTION FROM ARBITRATION	854	4
SUR-REPLY TO REPLY IN SUPPORT OF MOTION FOR WRIT OF EXECUTION	2629	11
TRIAL DATE MEMO	2977	12
UNLATERAL CASE CONFERENCE REPORT	939	4
WARRANT OF ARREST	3115	13
WRIT OF EXECUTION	2676	11
WRIT OF EXECUTION (4)	2687	11





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usual course of business or shall be organized and labeled to correspond with the categories listed. NRCP 45(d)(1).

**Pursuant to NRCP 45(c)(2)(A), you need not appear in person at the place of production or inspection. You may forward the record(s) directly to the Law Offices of Watson Rounds, a Professional Corporation (see attached Exhibit "2").**

Attached as Exhibit "3" is a Declaration of Custodian of Records for your use in certifying the authenticity of the records to be produced.

For failure to obey a subpoena you will be deemed guilty of contempt of court and liable to pay all losses and damages sustained thereby to the parties aggrieved and forfeit ONE HUNDRED DOLLARS (\$100.00) in addition thereto.

**AFFIRMATION**

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

DATED: June 8, 2015.

WATSON ROUNDS


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

EXHIBIT "1"  
TO SUBPOENA DUCES TECUM  
(Items to be Produced)

- 1  
2  
3 1. Any and all documents related to Zandian's interest in Sparks Village LLC,  
4 including any and all transfers of Zandian's interests; and, any and all payments to  
5 or from Zandian, including the amounts and names of financial institutions related  
6 to any payments or transfers;
- 7 2. Any and all documents related to Zandian's interest in Dayton Plaza, L.L.C.,  
8 including any and all transfers of Zandian's interests; and, payment to or from  
9 Zandian, including the amounts and names of financial institutions related to any  
10 payments or transfers;
- 11 3. Any and all documents related to Zandian's interest in 11000 Reno Highway  
12 Fallon, L.L.C., including any and all transfers of Zandian's interests; and, payment  
13 to or from Zandian, including the amounts and names of financial institutions  
14 related to any payments or transfers;
- 15 4. Any and all documents related to Zandian's interest in Reno Highway Plaza,  
16 L.L.C., including any and all transfers of Zandian's interests; and, payment to or  
17 from Zandian, including the amounts and names of financial institutions related to  
18 any payments or transfers.
- 19 5. Any and all documents related to Zandian's interest in I-50 Plaza LLC, including  
20 any and all transfers of Zandian's interests; and, payment to or from Zandian,  
21 including the amounts and names of financial institutions related to any payments  
22 or transfers.  
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EXHIBIT "2"

TO SUBPOENA DUCES TEUCM  
(Nevada Rules of Civil Procedure)

Rule 45

(c) Protection of Persons Subject to Subpoena.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

1 (ii) requires disclosure of an unretained expert's opinion or information  
2 not describing specific events or occurrences in dispute and resulting from the expert's study  
3 made not at the request of any party,

4 the court may, to protect a person subject to or affected by the subpoena, quash or modify the  
5 subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for  
6 the testimony or material that cannot be otherwise met without undue hardship and assures that  
7 the person to whom the subpoena is addressed will be reasonably compensated, the court may  
8 order appearance or production only upon specified conditions.

[As amended; effective January 1, 2005.]

9 **(d) Duties in Responding to Subpoena.**

10 (1) A person responding to a subpoena to produce documents shall produce them as  
11 they are kept in the usual course of business or shall organize and label them to correspond  
12 with the categories in the demand.

13 (2) When information subject to a subpoena is withheld on a claim that it is privileged  
14 or subject to protection as trial preparation materials, the claim shall be made expressly and  
15 shall be supported by a description of the nature of the documents, communications, or things  
16 not produced that is sufficient to enable the demanding party to contest the claim.

[As amended; effective January 1, 2005.]

17 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena  
18 served upon that person may be deemed a contempt of the court from which the subpoena  
19 issued.

[As amended; effective January 1, 2005.]

EXHIBIT "3"  
TO SUBPOENA DUCES TECUM

DECLARATION OF CUSTODIAN OF RECORDS

I, \_\_\_\_\_, declare under the penalty of perjury  
under the laws of the State of Nevada, as follows:

1. That on the \_\_\_\_\_ day of June, 2015, the declarant received a Subpoena Duces Tecum requesting release of certain records.
2. I have examined the original of those records and have made a true and exact copy of them. The reproduction of such records attached hereto is a true and complete copy of the originals.
3. To the best of my knowledge, all such records were prepared at or near the time of the acts or events as occurred.

DATED: This \_\_\_\_\_ day of June, 2015.

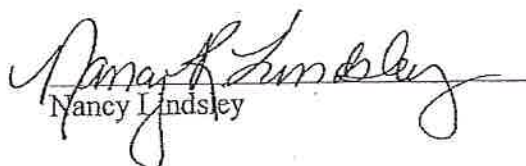
\_\_\_\_\_  
(Signature)

1 CERTIFICATE OF SERVICE

2 Pursuant to NRCPC 5(b), I certify that I am an employee of Watson Rounds, and that on  
3 this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true  
4 and correct copy of the foregoing document, SUBPOENA DUCES TECUM, addressed as  
5 follows:

6 Kaempfer Crowell  
7 510 West Fourth Street  
8 Carson City, Nevada 89703  
*Attorneys for Defendant, Reza Zandian*

9 Dated: June 9<sup>th</sup>, 2015.

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Nancy Lindsley

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# EXHIBIT 4

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# EXHIBIT 4



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

RECEIVED

JUN 12 2015

6  
7 **In The First Judicial District Court of the State of Nevada**

8 **In and for Carson City**

9  
10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

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

20 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

21 **SUBPOENA DUCES TECUM**

22 (Records Only – No Appearance Required)

23 To: State Agent and Transfer Syndicate, Inc.  
24 112 North Curry Street  
Carson City, NV 89703

25 WE COMMAND YOU produce to the law offices of WATSON ROUNDS, 5371  
26 Kietzke Lane, Reno, Nevada on or before June 30, 2015, documents, or tangible things set  
27 forth on Exhibit 1 attached hereto. All documents shall be produced as they are kept in the  
28 usual course of business or shall be organized and labeled to correspond with the categories  
listed. NRCPC 45(d)(1).

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Pursuant to NRCP 45(c)(2)(A), you need not appear in person at the place of production or inspection. You may forward the record(s) directly to the Law Offices of Watson Rounds, a Professional Corporation (see attached Exhibit "2").

Attached as Exhibit "3" is a Declaration of Custodian of Records for your use in certifying the authenticity of the records to be produced.

For failure to obey a subpoena you will be deemed guilty of contempt of court and liable to pay all losses and damages sustained thereby to the parties aggrieved and forfeit ONE HUNDRED DOLLARS (\$100.00) in addition thereto.

**AFFIRMATION**

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

DATED: June 8, 2015.

WATSON ROUNDS

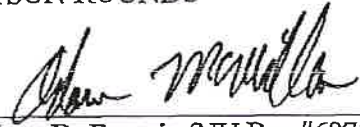
By:   
Matthew D. Francis (NV Bar #6978)  
Adam P. McMillen (NV Bar #10678)  
5371 Kietzke Lane  
Reno, NV 89511  
Telephone: 775-324-4100  
Facsimile: 775-333-8171  
*Attorneys for Plaintiff Jed Margolin*

Exhibit 1

Exhibit 1

EXHIBIT "1"  
TO SUBPOENA DUCES TECUM  
(Items to be Produced)

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1. Any and all documents related to real property located in Elko County, Nevada, parcel 006-100-008;
2. Any and all documents related to real property located in Churchill County, Nevada, parcel 007-151-12;
3. Any and all documents related to Zandian's interest in Stagecoach Vally LLC; and,
4. Any and all documents related to Zandian's interest in Elko North 5<sup>th</sup> Avenue LLC.

# Exhibit 2

# Exhibit 2

EXHIBIT "2"  
TO SUBPOENA DUCES TEUCM  
(Nevada Rules of Civil Procedure)

**Rule 45**

**(c) Protection of Persons Subject to Subpoena.**

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

1 (i) requires disclosure of a trade secret or other confidential research,  
development, or commercial information, or

2 (ii) requires disclosure of an unretained expert's opinion or information  
3 not describing specific events or occurrences in dispute and resulting from the expert's study  
4 made not at the request of any party,

5 the court may, to protect a person subject to or affected by the subpoena, quash or modify the  
6 subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for  
7 the testimony or material that cannot be otherwise met without undue hardship and assures that  
the person to whom the subpoena is addressed will be reasonably compensated, the court may  
order appearance or production only upon specified conditions.

[As amended; effective January 1, 2005.]

8 **(d) Duties in Responding to Subpoena.**

9 (1) A person responding to a subpoena to produce documents shall produce them as  
10 they are kept in the usual course of business or shall organize and label them to correspond  
11 with the categories in the demand.

12 (2) When information subject to a subpoena is withheld on a claim that it is privileged  
13 or subject to protection as trial preparation materials, the claim shall be made expressly and  
14 shall be supported by a description of the nature of the documents, communications, or things  
not produced that is sufficient to enable the demanding party to contest the claim.

[As amended; effective January 1, 2005.]

15 **(e) Contempt.** Failure by any person without adequate excuse to obey a subpoena  
16 served upon that person may be deemed a contempt of the court from which the subpoena  
issued.

[As amended; effective January 1, 2005.]

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# Exhibit 3

# Exhibit 3



EXHIBIT "3"  
TO SUBPOENA DUCES TECUM

DECLARATION OF CUSTODIAN OF RECORDS

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I, \_\_\_\_\_, declare under the penalty of perjury  
under the laws of the State of Nevada, as follows:

1. That on the \_\_\_\_\_ day of June, 2015, the declarant received a Subpoena Duces Tecum requesting release of certain records.
2. I have examined the original of those records and have made a true and exact copy of them. The reproduction of such records attached hereto is a true and complete copy of the originals.
3. To the best of my knowledge, all such records were prepared at or near the time of the acts or events as occurred.

DATED: This \_\_\_\_\_ day of June, 2015.

\_\_\_\_\_  
(Signature)

CERTIFICATE OF SERVICE

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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, SUBPOENA DUCES TECUM, addressed as follows:

Kaempfer Crowell  
510 West Fourth Street  
Carson City, Nevada 89703  
*Attorneys for Defendant, Reza Zandian*

Dated: June <sup>9th</sup> 2015.

  
Nancy Lindsley

# EXHIBIT 5

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# EXHIBIT 5

1 SEVERIN A. CARLSON  
Nevada Bar No. 9373  
2 TARA C. ZIMMERMAN  
Nevada Bar No. 12146  
3 KAEMPFER CROWELL  
510 West Fourth Street  
4 Carson City, Nevada 89703  
Telephone: (775) 882-1311  
5 Fax: (775) 882-0257  
scarlson@kcnvlaw.com  
6 tzimmerman@kcnvlaw.com

7 Attorneys for Defendant  
REZA ZANDIAN

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

11 JED MARGOLIN, an individual,

12 Plaintiff,

13 vs.

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

20 Defendants.

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

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**DECLARATION OF TARA C. ZIMMERMAN IN SUPPORT OF DEFENDANT REZA ZANDIAN'S MOTION FOR PROTECTIVE ORDER**

COUNTY OF WASHOE )  
) ss.  
STATE OF NEVADA )

I, TARA C. ZIMMERMAN, do hereby swear under penalty of perjury that the following assertions are true and correct to the best of my knowledge:

1. I am an attorney duly licensed to practice law in the State of Nevada. I am over the age of 18 years and am competent to testify to the following facts known personally to me.

2. I work at the law firm of Kaempfer Crowell, counsel for Defendant Reza Zandian in the above-entitled action.

3. I have personal knowledge of all matters stated herein, except for those I have stated upon information and belief, which I believe to be true, and would competently testify as to the matters set forth herein and make this declaration under penalty of perjury.

4. With this motion, the Defendant seeks protection from subpoenas duces tecum to Bijan Akhavan, Sassan Chakamian, Sean Fayeghi and State Agent Transfer Syndicate, Inc. ("Subject Subpoenas") which request that they produce records in this matter. Copies of the subpoenas are attached to Defendant's Opposition to Plaintiff's Motion for Judgment Debtor Examination and to Produce Documents and Motion for Protective Order as Exhibits 1, 2, 3 and 4, respectively.

5. I personally conversed with Adam P. McMillen, counsel for Plaintiff, on June 29, 2015, over the telephone in an effort to resolve the dispute related to the Subject Subpoenas.

6. Mr. McMillen and I were unable to resolve the dispute.

7. The requested protective order is necessary to protect all parties, including the witnesses, from annoyance, undue burden and expense.

1           8.     I hereby certify that on behalf of Mr. Zandian, I have conferred in good faith with  
2 Mr. McMillen to avoid this Motion, but that my effort did not resolve the dispute.

3           9.     This Motion is brought in good faith and not for an improper purpose.

4           10.    I declare under penalty of perjury that the foregoing is true and correct.

5           Executed this 29<sup>th</sup> day of June, 2015.

6

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*Tara Zimmerman*  
TARA C. ZIMMERMAN

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

REC'D & FILED

2015 JUL 10 PM 4:30

SUSAN MERRIWEATHER  
CLERK

BY  DEPUTY

5  
6  
7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**

9 **JED MARGOLIN, an individual,**

10 **Plaintiff,**

11 vs.

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

21 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

**REPLY IN SUPPORT OF MOTION**  
**FOR JUDGMENT DEBTOR**  
**EXAMINATION AND TO PRODUCE**  
**DOCUMENTS AND OPPOSITION TO**  
**DEFENDANT REZA ZANDIAN'S**  
**MOTION FOR PROTECTIVE**  
**ORDER**

22 **I. DISCOVERY OF ZANDIAN'S ASSETS IS PROPER**

23 The purpose of the requested post-judgment discovery is to discover Defendant Reza  
24 Zandian's ("Zandian") assets to satisfy the Judgment. Zandian has not been willing to post a  
25 supersedeas bond while the appeal process is completed and Zandian has not provided any  
26 information about his assets in order to satisfy the Judgment. Also, subsequent to the appeal in  
27 this matter, Plaintiff has learned of several instances where Zandian has transferred assets to  
28 third-parties in an apparent attempt to place assets out of reach. It is reasonable to believe  
Zandian has assets which cannot be discovered unless Zandian is compelled by Order of the

1 Court to disclose them. The following information demonstrates the appropriateness and  
2 reasonableness of the requested discovery.

3 On March 27, 2015, Zandian resigned as an officer from Sparks Village LLC and I-50  
4 Plaza LLC. See Exhibits 1 and 2. Both companies own valuable real estate. It is unknown if  
5 Zandian cashed out of those businesses or what he has done with his ownership interests.

6 Also, Sean Fayeghi, who was served with one of the subpoenas Zandian is now asking to be  
7 quashed, is also the registered agent for and an officer of both companies. Mr. Fayeghi is also  
8 listed as the registered agent for 11000 Reno Highway, Fallon L.L.C., which is still an active  
9 company and Zandian is listed as an active member with a San Diego, California address. See  
10 Exhibit 3.

11 On April 30, 2015, Zandian was removed as a managing member of Stagecoach Valley  
12 LLC. See Exhibit 4. Zandian's address was listed as being in Carson City, Nevada. See *id.*  
13 Zandian was removed as managing member by Sassan Chakamian, who is also a managing  
14 member of Stagecoach Valley LLC and Mr. Chakamian was also served with one of the  
15 subpoenas Zandian now seeks to quash. See *id.* Bijan Akhavan also serves as a managing  
16 member of Stagecoach Valley LLC and Mr. Akhavan was also served with one of the  
17 subpoenas Zandian now seeks to quash. See *id.*

18 Zandian is an active member of Elko North 5<sup>th</sup> Avenue LLC. See Exhibit 5. Zandian  
19 lists a Carson City, Nevada, address for this LLC. See *id.* Also, the Chakamian 2004 Trust is  
20 an active member of this LLC which is associated with Sassan Chakamian who was also  
21 served with a subpoena that Zandian now seeks to quash.

22 Zandian also seeks to quash the subpoena to State Agent and Transfer Syndicate, Inc.,  
23 which is the registered agent of Elko North 5<sup>th</sup> Avenue LLC and Stagecoach Valley LLC. See  
24 Exhibits 4 and 5.

25 Zandian had an interest in a 40 acre property in Lyon County that he gave up last year.  
26 See Exhibit 6.

27 Zandian dirtied the titles to all other real property he owns in Nevada. The settlement  
28 conference for the appeal of this matter took place on May 21, 2014. The day before, on May



1 20, 2014, Zandian signed documents to dirty the titles to six parcels in Lyon County, which  
2 were then recorded May 21, 2014. See Exhibits 7-9.<sup>1</sup> These documents transferred Zandian's  
3 interest in the properties to Alborz Zandian and Niloofar Foughani Zandian. *Id.* These  
4 documents also state that the transfers were made "per financial agreement entered into in Las  
5 Vegas, Nevada and dated August 21, 2003." *Id.* However, all six parcels were purchased by  
6 Zandian after the purported August 21, 2003 "financial agreement." See Exhibits 10-12.  
7 None of the purchase documents refer to the alleged "financial agreement." *Id.* Also, the  
8 "financial agreement" has never been produced or recorded with any Nevada county.

9 On March 18, 2014, Zandian similarly dirtied the titles to three parcels in Churchill  
10 County, per the same August 21, 2003 "financial agreement." See Exhibits 13-15.<sup>2</sup> All of  
11 these parcels were purchased after August 21, 2003 and none of the purchase documents refer  
12 to the alleged "financial agreement." See Exhibits 16-18.

13 On March 17, 2014, Zandian similarly dirtied the title to one parcel in Elko County,  
14 per the same August 21, 2003 "financial agreement." See Exhibit 19.<sup>3</sup> This parcel was also  
15 purchased after August 21, 2003 and the purchase documents do not refer to the alleged  
16 "financial agreement." See Exhibit 20.

17 On May 30, 2014, Zandian similarly dirtied the titles to two parcels in Clark County,  
18 per the same August 21, 2003 "financial agreement." See Exhibits 21-22.<sup>4</sup> All of these  
19 parcels were purchased after August 21, 2003 and none of the purchase documents refer to the  
20 alleged "financial agreement." See Exhibits 23-24.

21 On March 18, 2014, Zandian similarly dirtied the title to one parcel in Washoe County,  
22 per the same August 21, 2003 "financial agreement." See Exhibit 25.<sup>5</sup> This parcel was also  
23  
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25 <sup>1</sup> Zandian personally appeared before a notary in Carson City, Nevada, to sign the documents. See Exhibits 7-9.

26 <sup>2</sup> Zandian personally appeared before a notary in Carson City, Nevada, to sign the documents. See Exhibits 13-15.

27 <sup>3</sup> Zandian personally appeared before a notary in Carson City, Nevada, to sign the document. See Exhibit 19.

28 <sup>4</sup> Zandian personally appeared before a notary in Carson City, Nevada, to sign the documents. See Exhibits 21-22.

<sup>5</sup> Zandian personally appeared before a notary in Carson City, Nevada, to sign the document. See Exhibit 25.

1 purchased after August 21, 2003 and the purchase documents do not refer to the alleged  
2 “financial agreement.” See Exhibit 26.

3 It appears Zandian dirtied the title to nine (9) other parcels in Washoe County as well.<sup>6</sup>  
4 On August 1, 2003, Zandian received title to the nine parcels. See Exhibit 27. On July 31,  
5 2003, Niloo Far Foughani transferred her interests in four of the same parcels to Zandian. See  
6 Exhibit 28. On June 22, 2007, John Peter Lee filed a Judgment Confirming Arbitration Award  
7 with the Washoe County Recorder indicating Zandian was given title to the nine Pah Rah  
8 properties free and clear. See Exhibit 29 (selected portions attached). On March 18, 2014, a  
9 grant deed was filed by Zandian transferring his interest in the nine Pah Rah properties to  
10 Alborz Zandian and Niloofar Foughani “per financial agreement entered into in Las Vegas,  
11 Nevada and dated 08-21-2003,” as he has done with the previously mentioned properties. See  
12 Exhibit 30.<sup>7</sup> While the nine Pah Rah properties were initially purchased before the alleged  
13 August 21, 2003 “financial agreement,” there is no evidence, before the March 18, 2014 filing,  
14 that such an agreement existed or was ever recorded.

15 The above issues, coupled with Zandian’s history of evading any kind of discovery and  
16 process in this matter, demonstrate that the requested Order for discovery of Zandian’s assets  
17 is reasonable and appropriate.

## 18 **II. LEGAL ARGUMENT**

### 19 **A. Zandian Can Be Made To Appear Before This Court For A** 20 **Debtor’s Examination**

21 Zandian asserts he resides in France and cannot be compelled to appear at a debtor’s  
22 examination in Carson City, Nevada. See Opposition at 3:15-18. However, Zandian has not  
23 provided any proof he resides in France. No utility bills. No billing statements. Nothing.<sup>8</sup>  
24

25  
26 <sup>6</sup> These parcels are known as the “Pah Rah” properties.

27 <sup>7</sup> Zandian personally appeared before a notary in Carson City, Nevada, to sign the document. See Exhibit 30.

28 <sup>8</sup> Zandian should not be allowed to respond to this reply with regards to the Motion for Debtor’s Examination and the requested discovery from Zandian in its response to Plaintiff’s opposition to the motion for protective order as the protective order only pertains to the subpoenas addressed to third-parties. Otherwise, Plaintiff requests it be allowed to respond to any further response to this motion.

1 Further, the evidence available shows addresses for Zandian in Carson City and that Zandian  
2 signs documents in Carson City. See Exhibits 4, 5, 7-9, 13-15, 19, 21-22, 25, 30.

3 Also, Zandian listed a Las Vegas address on his 2014 Schedule K-1 (Form 1065) for  
4 Dayton Plaza LLC, of which he is an active member. See Exhibit 31. The IRS instructions for  
5 Form 1065 state in pertinent part as follows: “Foreign address. If the partner has a foreign  
6 address, enter the information in the following order: City or town, state or province, country  
7 and ZIP or foreign postal code. Follow the country’s practice for entering the postal code. Do  
8 not abbreviate the country name.” See Exhibit 32. The IRS instructions further state as  
9 follows:  
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11 If the partnership's address is outside the United States or its possessions or  
12 territories, enter the information on the line for “City or town, state or province,  
13 country, and ZIP or foreign postal code” in the following order: city, province  
14 or state, and the foreign country. Follow the foreign country's practice in  
15 placing the postal code in the address. Do not abbreviate the country name.

16 If the partnership has changed its address since it last filed a return (including a  
17 change to an “in care of” address), check box G(4) for “Address change.”

18 See Exhibit 33. Zandian did not provide his French address to the IRS. If he resided in  
19 France, he should have provided any such French address to the IRS. There is no evidence he  
20 ever provided an address change indicating he lives in France. There is no evidence he resides  
21 in France besides his own self-serving statements.

22 In short, the evidence indicates Zandian resides and does business throughout Nevada,  
23 including Carson City, Nevada. Therefore, Zandian should be compelled to appear for a  
24 debtor’s examination before this Court.

25 Moreover, Nevada case law supports this Court ordering Zandian to appear at a  
26 debtor’s examination before this Court in Carson City even if he were not a resident of  
27 Nevada. Pursuant to a motion for debtor’s examination, the court in *Rausch v. World Series of*  
28 *Golf, Inc.*, No. 2:10-CV-00412-KJD, 2012 WL 1517294, at \*1 (D. Nev. Apr. 23, 2012)  
ordered “defendant World Series of Golf, Inc. to appear [...] for a debtor examination to be

1 conducted in accordance with the provisions of NRS 21.270.” *Id.* The *Rausch* court stated  
2 that “[f]ailure to appear may result in sanctions. See NRS 21.270(3).” *Id.* Before the  
3 examination, counsel for the defendant sent a letter to plaintiff’s counsel stating he was not  
4 aware of any defendant officers that “reside in Clark County or the state of Nevada,” and he  
5 had not been able to procure a company representative to appear at the debtor’s examination.  
6 *Id.* Defense counsel also stated he was providing advance notice so as to “avoid unnecessary  
7 costs associated with hiring a court reporter or otherwise preparing for the examination.” *Id.*  
8 Plaintiff’s counsel then called defense counsel and indicated he was going forward with the  
9 examination. *Id.*

11 Plaintiff’s counsel in the *Rausch* case “attempted to take the exam of defendant, but  
12 neither an agent nor a representative of [the defendant] appeared.” *Id.* “At the judgment  
13 debtor exam, plaintiff’s counsel called defense counsel to allow defense counsel to make a  
14 record.” *Id.* “Defense counsel stated on the record that he was unable to procure a  
15 representative to appear at the judgment debtor exam.” *Id.* “Plaintiff’s counsel asserted that  
16 he intended on seeking sanctions from the court for defendant’s failure to appear at the  
17 judgment debtor exam.” *Id.*

19 Pursuant to a motion for contempt sanctions for the defendant not appearing at the  
20 debtor’s examination, the *Rausch* court found the defendant “did not attempt to appear or  
21 reschedule the judgment debtor exam, and therefore violated the court’s order beyond  
22 substantial compliance.” *Id.* (citation omitted). The *Rausch* court recommended a finding of  
23 criminal contempt and recommended a \$2,000 sanction for defendant’s failure to obey the  
24 order to appear at the debtor’s examination. *Id.* Further, the *Rausch* court recommended the  
25 District Judge order plaintiff to schedule the judgment debtor exam to occur at the federal  
26 courthouse in Las Vegas and order defendant to appear. *Id.* It was also recommended that if  
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28

1 defendant did not appear at the second debtor's exam that defendant be sanctioned \$500 a day  
2 until a representative of defendant appears at the judgment debtor exam. *Id.*

3 **B. The Documents Sought From Zandian Are Reasonably Calculated**  
4 **To Lead To The Discovery Of Zandian's Assets**

5 Zandian makes a groundless/baseless assertion that Plaintiff's requests for documents  
6 from Zandian in aid of execution of the Judgment are overbroad, oppressive, designed to  
7 harass and are not likely to lead to the discovery of relevant evidence. Plaintiff, of course,  
8 believes the requested documents are reasonable in time and scope and will lead to the  
9 discovery of Zandian's assets.

10 "A judgment creditor can [...] conduct the ordinary methods of discovery in pursuit of  
11 a judgment claim. 'In aid of the judgment or execution, the judgment creditor or his successor  
12 in interest when that interest appears of record, may obtain discovery from any person,  
13 including the judgment debtor, in the manner provided in these rules.'" *Greene v. Eighth*  
14 *Judicial Dist. Court of Nevada ex rel. Cnty. of Clark*, 115 Nev. 391, 396, 990 P.2d 184, 186-87  
15 (1999) (citing NRCPC 69).

16 Zandian argues that requests "a, j and k" are limitless in duration. *See* Opposition at  
17 4:16. However, request "a" on its face only requests records showing Zandian's current assets  
18 as indicated by the language contained therein that states "assets that may be available for  
19 execution to satisfy the Judgment..." *See* Motion at 2:1-5. Request "j" is limited in duration  
20 as it requests the source of payment of Zandian's counsel in this matter. *See id.* at 2:24-25.  
21 Therefore, this request would be limited at least to the time frame of this matter and is  
22 therefore not "limitless." Request "k" is on its face without any time limit and Plaintiff would  
23 be willing to agree to limit the request to any settlement agreements by which a party has  
24 agreed to pay money to Zandian since the entering of the Judgment or upon which Zandian is  
25 currently owed money.  
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1           Zandian next argues that the remainder of the requests seek documents from 2007 to  
2 the present and that it would be “highly unlikely” that documents going back to 2007 “will  
3 provide information related to Zandian’s current assets available to pay the judgment against  
4 him or to otherwise aid in the enforcement of the judgment.” *See* Opposition at 4:18-22.  
5 However, as shown above, Zandian has recently filed documents with several Nevada counties  
6 indicating there is an August 21, 2003 “financial agreement” whereby Zandian allegedly  
7 transferred interests in property to others, even though at least in some instances Zandian had  
8 not yet owned the property. This alone demonstrates the reasonableness of Plaintiff’s requests.  
9 Also, Zandian signed the fraudulent assignment documents with the US Patent and Trademark  
10 Office in 2007, which actions eventually led to the Judgment. *See* Complaint, filed 12/11/09,  
11 ¶¶ 15-16. With Zandian’s recent dirtying of titles here in Nevada, it is reasonable to seek  
12 discovery of documents going back to 2007 in order to understand any transfers of assets that  
13 may have occurred from that time to the present.  
14

15                           **C.     A Protective Order Prohibiting The Production Requested In The**  
16                           **Subpoenas Is Not Proper**

17           “[I]n accordance with Nev.Rev.Stat. 21.320, a ‘judge may order any property of the  
18 judgment debtor to be applied toward satisfaction of the judgment, whether it is in the  
19 possession of the judgment debtor or a third party, as long as it is not exempt from  
20 execution.’” *Quiroz v. Dickerson*, No. 3:10-CV-00657-LRH, 2015 WL 321401, at \*3 (D.  
21 Nev. Jan. 23, 2015) (citing *Greene v. Eighth Judicial Dist. Court of Nevada*, 115 Nev. 391,  
22 990 P.2d 184, 186 (1999)). Not only is the subpoena power available to a judgment creditor,  
23 “a judge may (under circumstances set forth in the statute) order a third party in possession of  
24 property of the judgment debtor to appear before the judge or a master to submit to  
25 examination regarding such property.” *Greene*, 115 Nev. at 395-96, 990 P.2d at 186-87 (citing  
26 NRS 21.300). “In aid of the judgment or execution, the judgment creditor or his successor in  
27 interest when that interest appears of record, may obtain discovery from *any person*, including  
28 interest when that interest appears of record, may obtain discovery from *any person*, including



1 the judgment debtor, in the manner provided in these rules.” *Greene*, 115 Nev. at 395-96, 990  
2 P.2d at 186-87 (citing NRCPC 69) (emphasis added).

3 It is undisputed Plaintiff can serve the subpoenas on the subject entities and  
4 individuals. Zandian’s problem is that Plaintiff is asking for documents from the subject  
5 entities and individuals, at all. There really is nothing more to Zandian’s argument.

6 In support of his argument, Zandian states he “in good faith” tried to “resolve this  
7 discovery dispute without court action” and cites to Tara Zimmerman’s declaration.<sup>9</sup> *See*  
8 *Opposition* at 6:13-15. The sum total of her declaration regarding her attempt to resolve the  
9 matter simply states that she called undersigned counsel and was unable to resolve the dispute.  
10 *See id.* at Zimmerman Declaration, Exhibit 5, ¶¶ 5-6. The declaration leaves out the fact that  
11 Ms. Zimmerman proposed to resolve the discovery dispute by offering to have Zandian  
12 produce the records requested in the subpoenas instead of the subpoenaed parties. When the  
13 undersigned agreed to such a resolution, Ms. Zimmerman immediately took that resolution off  
14 the table and said she had not yet spoken with her client and then went on to say that the  
15 parties could not resolve the discovery dispute even though Plaintiff was more than willing to  
16 resolve the same.  
17  
18

19 For the first time in his *Opposition*, Zandian now adds to his argument that the  
20 requested documents are “extremely sensitive.” *See Opposition* at 6:16. However, according  
21 to NRCPC 26, that is not a basis upon which discovery may be halted. *See NRCPC 26(b)*. While  
22 “extremely sensitive” documents might appropriately be subject to a protective order, which  
23 Plaintiff would have readily agreed to a protective order if the issue would have been brought  
24  
25

26  
27 <sup>9</sup> Counsel are attempting to resolve the issue related to the fact that Tara Zimmerman was a law clerk to Judge  
28 James Russell at the same time this matter was pending before Judge Russell. To date, the matter has not been  
resolved and therefore Plaintiff believes it is inappropriate for Ms. Zimmerman to represent Zandian until there  
has been a resolution of the matter in accordance with the Nevada Rules of Professional Conduct, including  
Rule 1.11.

1 up earlier, the documents should still be produced under the rules of discovery and in aid of  
2 execution.

3 Zandian's assertion that the subpoenas have or will cause any annoyance,  
4 oppressiveness, undue burden or undue expense is without merit. Plaintiff is the one who has  
5 suffered these things over the years in trying to chase Zandian to the four corners of the earth  
6 for simple information related to his assets. To show that this is the case, if Zandian were  
7 serious about the arguments he is making in the Opposition, he would have already produced  
8 all of the records related to his current assets for the last three years, which he says should be  
9 the limit of discovery at this time. *See* Opposition at 9:12-14.

10  
11 The subpoenas were sent to people and entities that Zandian has business dealings and  
12 business interests with regards to Zandian's assets. It is highly likely the subpoenaed  
13 discovery requests will aid in execution of the judgment by providing information about  
14 Zandian's current assets. As Plaintiff has not been provided the requested documents by  
15 Zandian himself, Plaintiff is left to search for the relevant information through the subpoenas.  
16 As stated before, if Zandian provided the requested information, then Plaintiff would gladly  
17 withdraw the subpoenas. However, this has not happened and given the difficulty of not  
18 getting any discovery responses from Zandian, either before or after the judgment, even when  
19 ordered to do so by this Court, Plaintiff must respectfully request that the Court deny  
20 Zandian's efforts to thwart discovery in this matter at this time.

21  
22 Additionally, with regard to the records requested of the subpoenaed parties, Plaintiff is  
23 not aware of any rule that requires "concrete evidence of a concealed or fraudulently  
24 transferred asset" before the discovery can go forward, as is advocated by Zandian. *See*  
25 Opposition at 9:15-17.

26  
27 ///

28 ///



**D. Plaintiff Requests A Hearing On The Motion And Opposition**

Given the nature of the opposition and the motion for protective order, Plaintiff respectfully requests a hearing before the Court in order to resolve the current discovery issues as expeditiously as possible.

**CONCLUSION**

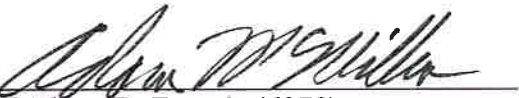
For the reasons stated above, Plaintiff Jed Margolin respectfully requests this Court grant the Motion for Debtor's Examination and deny Defendant Reza Zandian's Motion for Protective Order.

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

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

The undersigned also declares under penalty of perjury that the foregoing is true and correct.

Dated this 10<sup>th</sup> day of July, 2015.

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*

**EXHIBIT LIST**

	<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>PAGE(S)</b>
1			
2			
3	1	Nevada Secretary of State entity details for SPARKS VILLAGE, LLC	4
4	2	Nevada Secretary of State entity details for I-50 PLAZA, LLC	4
5			
6	3	Nevada Secretary of State entity details for 11000 RENO HIGHWAY, FALLON, LLC	5
7	4	Nevada Secretary of State entity details for STAGECOACH VALLEY LLC.	5
8			
9	5	Nevada Secretary of State entity details for ELKO NORTH 5 <sup>TH</sup> AVE, LLC	4
10	6	Lyon County Doc# 526743 – Trustee’s Deed recorded 10/15/2014 - APN: 021-451-22	6
11			
12	7	Lyon County Doc# 521532 – Grant Deed recorded 5/21/2014 – APNs: 006-052-04, 006-052-05 & 006-052-06	6
13			
14	8	Lyon County Doc# 521533 – Grant Deed recorded 5/21/2014 – APN: 015-311-02	4
15	9	Lyon County Doc# 521531 – Grant Deed recorded 5/21/2014, APNs: 015-311-18 & 015-311-19	5
16			
17	10	Lyon County Doc# 342193 – Grant, Bargain and Sale Deed recorded 02/04/2005, APNs: 6-052-04, 6-052-05 & 6-052-06	6
18			
19	11	Lyon County Doc# 403892 – Grant, Bargain and Sale Deed recorded 04/06/2007, APN: 15-311-02	4
20	12	Lyon County Doc# 344412 – Grant, Bargain and Sale Deed recorded 03/03/2005, APNs: 15-311-18 & 15-311-19	5
21			
22	13	Churchill County Doc# 439670 – Grant Deed recorded 03/18/2014, APN: 007-151-12	5
23			
24	14	Churchill County Doc# 439671 – Grant Deed recorded 03/18/2014, APN: 007-151-77	4
25	15	Churchill County Doc# 439672 – Grant Deed recorded 03/18/2014, APN: 009-33-104	4
26			
27	16	Churchill County Doc# 383845 – Grant, Bargain and Deed recorded 07/10/2006, APN: 007-151-12	5
28	17	Churchill County Doc# 384273 – Grant, Bargain and Sale Deed recorded 07/27/2006, APN: 007-151-77	4

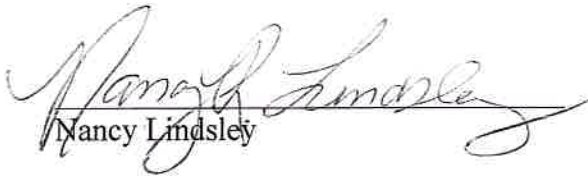
1	18	Churchill County Doc# 372686 – Grant, Bargain and Sale Deed recorded 07/06/2005, APN: 009-33-104	4
2			
3	19	Elko County Doc# 684351 – Grant Deed recorded 03/17/2014, APN: 001-660-034	6
4	20	Elko County Doc# 560545 – Grant, Bargain and Sale Deed recorded 09/26/2006, APN: 001-660-034	6
5			
6	21	Clark County Doc# 20140530-0001037 – Grant Deed recorded 05/30/2014, APN: 071-02-000-005	4
7	22	Clark County Doc# 20140530-0001038 – Grant Deed recorded 05/30/2014, APN: 071-02-000-013	4
8			
9	23	Clark County Doc# 20050419-0004639– Grant, Bargain and Sale Deed recorded 04/19/2005, APN: 071-02-000-005	4
10			
11	24	Clark County Doc# 20050420-0000563– Grant, Bargain and Sale Deed recorded 04/20/2005, APN: 071-02-000-013	4
12			
13	25	Washoe County Doc# 4335754– Grant Deed recorded 03/18/2014, APN: 079-150-12	3
14	26	Washoe County Doc# 3236343– Grant, Bargain and Sale Deed recorded 06/27/2005, APN: 079-150-12	3
15			
16	27	Washoe County Doc# 2900592– Grant, Bargain and Deed recorded 08/06/2003, APNs: 079-150-09, 079-150-10, 07-150-13, 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17	8
17			
18	28	Washoe County Doc# 2900593– Grant, Bargain and Sale Deed recorded 08/06/2003, APN: 079-150-09, 079-150-10, 079-150-13, 084-130-07, 084-140-17	7
19			
20	29	Washoe County Doc# 3547263– Judgment Confirming Arbitration Award recorded 06/22/2007	16
21			
22	30	Washoe County Doc# 4335755– Grant Deed recorded 03/18/2014, APNs: 079-150-09, 070-150-10, 079-150-13, 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17	7
23			
24	31	IRS Form 1065 - Dayton Plaza, LLC – 2014 Schedule K-1 Partner: Reza Zandian, 1401 Las Vegas Blvd South Las Vegas, NV 89104	2
25			
26	32	Instructions for Form 1065, page 26	2
27	33	Instructions for Form 1065, pages 15-16	3
28			

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, **REPLY IN SUPPORT OF MOTION FOR**  
5 **JUDGMENT DEBTOR EXAMINATION AND TO PRODUCE DOCUMENTS AND**  
6 **OPPOSITION TO DEFENDANT REZA ZANDIAN'S MOTION FOR PROTECTIVE**  
7 **ORDER**, addressed as follows:

8  
9 Severin A. Carlson  
10 Tara C. Zimmerman  
11 KAEMPFER CROWELL  
12 510 West Fourth Street  
13 Carson City, NV 89703  
14 Attorneys for Reza Zandian

15 Dated: July 10, 2015

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
  
Nancy Lindsley

# Exhibit 1

Exhibit 1

**SPARKS VILLAGE LLC**

Business Entity Information			
Status:	Active	File Date:	12/15/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC29380-2004
Qualifying State:	NV	List of Officers Due:	12/31/2015
Managed By:	Managers	Expiration Date:	12/15/2504
NV Business ID:	NV20041295883	Business License Exp:	12/31/2015

Additional Information	
Central Index Key:	

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
<b>No stock records found for this company</b>			

- Officers <span style="float: right;">Include Inactive Officers</span>			
Manager - SEAN S FAYEGHI			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Historical	Email:	
Manager - SEAN S FAYEGHI			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	USA
Status:	Active	Email:	
Manager - REZA ZANDIAN			
Address 1:	PO BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	91927	Country:	
Status:	Historical	Email:	
Manager - REZA ZANDIAN			
Address 1:	PO BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	91927	Country:	USA
Status:	Resigned	Email:	

- Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC29380-2004-001	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	LLC29380-2004-002	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Annual List		

Document Number:	20050561932-73	# of Pages:	1
File Date:	11/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070107298-06	# of Pages:	1
File Date:	2/8/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070801466-64	# of Pages:	1
File Date:	11/26/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080805719-20	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
08-09			
Action Type:	Annual List		
Document Number:	20100743562-60	# of Pages:	1
File Date:	10/1/2010	Effective Date:	
(No notes for this action)			
Action Type:	Miscellaneous		
Document Number:	20130804561-10	# of Pages:	1
File Date:	12/9/2013	Effective Date:	
CERT OF REIN			
Action Type:	Reinstatement		
Document Number:	20130804562-21	# of Pages:	1
File Date:	12/9/2013	Effective Date:	
REIN 10-14			
Action Type:	Acceptance of Registered Agent		
Document Number:	20130804563-32	# of Pages:	1
File Date:	12/9/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140803811-48	# of Pages:	1
File Date:	12/11/2014	Effective Date:	
(No notes for this action)			
Action Type:	Resignation of Officers		
Document Number:	20150140032-78	# of Pages:	1
File Date:	3/27/2015	Effective Date:	
(No notes for this action)			





\*160103\*



BARBARA K. CEGAVSKE  
Secretary of State  
202 North Carson Street  
Carson City, Nevada 89701-4201  
(775) 684-5708  
Website: www.nvsos.gov

**Certificate of Resignation of  
Officer, Director, Manager,  
Member, General Partner,  
Trustee or Subscriber**

Filed in the office of <i>Barbara K. Cegavske</i>	Document Number <b>20150140032-78</b>
Barbara K. Cegavske Secretary of State State of Nevada	Filing Date and Time <b>03/27/2015 11:52 AM</b>
	Entity Number <b>LLC29380-2004</b>

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ABOVE SPACE IS FOR OFFICE USE ONLY

**Certificate of Resignation of  
Officer, Director, Manager, Member,  
General Partner, Trustee or  
Subscriber**

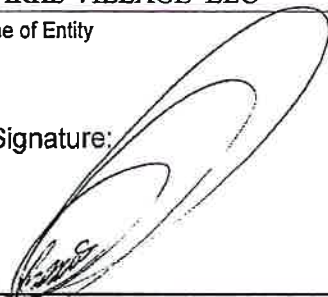
1. The name and title(s) of person that desires to resign:\*

REZA ZANDIAN	MANAGER
Name	Title(s)

2. The name and file number of the entity for which resignation is being made:

SPARKS VILLAGE LLC	LLC29380-2004
Name of Entity	File Number

3. Signature:

  
**X** \_\_\_\_\_  
 Authorized Signature

\* Resignation of one person from one entity per form.

**FILING FEE: \$75.00 PER FORM**

*This form must be accompanied by appropriate fees.*

Nevada Secretary of State Officer Resignation  
Revised: 1-5-15



# Exhibit 2

Exhibit 2

**I-50 PLAZA LLC**

Business Entity Information			
Status:	Active	File Date:	2/3/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0011952005-5
Qualifying State:	NV	List of Officers Due:	2/29/2016
Managed By:	Managers	Expiration Date:	2/3/2505
NV Business ID:	NV20051209794	Business License Exp:	2/29/2016

Additional Information	
Central Index Key:	

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
<b>No stock records found for this company</b>			

- Officers <span style="float: right;">Include Inactive Officers</span>			
Manager - SEAN S FAYEGHI			
Address 1:	276 DARK FOREST AVE	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89123	Country:	
Status:	Historical	Email:	
Manager - SEAN S FAYEGHI			
Address 1:	276 DARK FOREST AVE	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89123	Country:	USA
Status:	Active	Email:	
Manager - REZA ZANDIAN			
Address 1:	PO BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	91927	Country:	
Status:	Historical	Email:	
Manager - REZA ZANDIAN			
Address 1:	PO BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	91927	Country:	USA
Status:	Resigned	Email:	

- Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20050007640-04	# of Pages:	2
File Date:	2/3/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20050007642-26	# of Pages:	1
File Date:	2/3/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		

Document Number:	20050632605-29	# of Pages:	1
File Date:	12/21/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070012183-14	# of Pages:	1
File Date:	1/4/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080097515-37	# of Pages:	1
File Date:	2/12/2008	Effective Date:	
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Action Type:	Annual List		
Document Number:	20080806151-81	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100743512-65	# of Pages:	1
File Date:	10/1/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120068112-43	# of Pages:	1
File Date:	1/30/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120109962-02	# of Pages:	1
File Date:	2/16/2012	Effective Date:	
12/13			
Action Type:	Miscellaneous		
Document Number:	20140336364-12	# of Pages:	1
File Date:	5/6/2014	Effective Date:	
(No notes for this action)			
Action Type:	Reinstatement		
Document Number:	20140336365-23	# of Pages:	1
File Date:	5/6/2014	Effective Date:	
REVOKED 3/1/14 REIN 5/6/14			
Action Type:	Acceptance of Registered Agent		
Document Number:	20140336366-34	# of Pages:	1
File Date:	5/6/2014	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20150093834-65	# of Pages:	1
File Date:	2/28/2015	Effective Date:	
(No notes for this action)			
Action Type:	Resignation of Officers		
Document Number:	20150140033-89	# of Pages:	1
File Date:	3/27/2015	Effective Date:	
(No notes for this action)			



\*160103\*



BARBARA K. CEGAVSKE  
Secretary of State  
202 North Carson Street  
Carson City, Nevada 89701-4201  
(775) 684-5708  
Website: www.nvsos.gov

**Certificate of Resignation of  
Officer, Director, Manager,  
Member, General Partner,  
Trustee or Subscriber**

Filed in the office of <i>Barbara K. Cegavske</i>	Document Number <b>20150140033-89</b>
Barbara K. Cegavske Secretary of State State of Nevada	Filing Date and Time <b>03/27/2015 11:52 AM</b>
	Entity Number <b>E0011952005-5</b>

USE BLACK INK ONLY - DO NOT HIGHLIGHT

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Certificate of Resignation of  
Officer, Director, Manager, Member,  
General Partner, Trustee or  
Subscriber

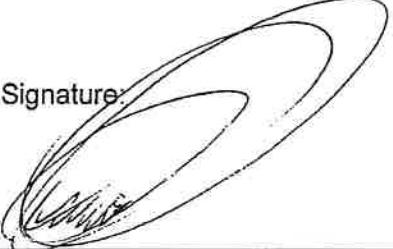
1. The name and title(s) of person that desires to resign:\*

REZA ZANDIAN	MANAGER
Name	Title(s)

2. The name and file number of the entity for which resignation is being made:

I-50 PLAZA LLC	E011952005-5
Name of Entity	File Number

3. Signature:



**X** \_\_\_\_\_  
Authorized Signature

\* Resignation of one person from one entity per form.

**FILING FEE: \$75.00 PER FORM**

*This form must be accompanied by appropriate fees.*

Nevada Secretary of State Officer Resignation  
Revised: 1-5-15

# Exhibit 3

# Exhibit 3

# 11000 RENO HIGHWAY, FALLON, L.L.C.

## Business Entity Information

Status:	Active	File Date:	6/9/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0363852005-8
Qualifying State:	NV	List of Officers Due:	6/30/2015
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051368188	Business License Exp:	6/30/2015

## Additional Information

Central Index Key:	
--------------------	--

## Registered Agent Information

Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

## Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
<b>No stock records found for this company</b>			

## — Officers

 Include Inactive Officers

### Manager - SEAN S FAYEGHI

Address 1:	1401 LAS VEGAS BLVD SOUTH	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	USA
Status:	Historical	Email:	

### Manager - SEAN S FAYEGHI

Address 1:	1401 LAS VEGAS BLVD SOUTH	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	USA
Status:	Active	Email:	

### Manager - SHA REZAIE

Address 1:	2242 CASSATT DR	Address 2:	
City:	LAS VEGAS	State:	NV



Zip Code:	89074	Country:	USA
Status:	Historical	Email:	
<b>Manager - SHA REZAIE</b>			
Address 1:	2242 CASSATT DR	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89074	Country:	USA
Status:	Active	Email:	
<b>Manager - REZA ZANDIAN</b>			
Address 1:	PO BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92192-7674	Country:	USA
Status:	Historical	Email:	
<b>Manager - REZA ZANDIAN</b>			
Address 1:	PO BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92192-7674	Country:	USA
Status:	Active	Email:	

<b>- Actions/Amendments</b>			
Action Type:	Articles of Organization		
Document Number:	20050222393-68	# of Pages:	1
File Date:	6/9/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20050222394-79	# of Pages:	2
File Date:	6/9/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060232918-43	# of Pages:	1
File Date:	4/12/2006	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20060601627-50	# of Pages:	1
File Date:	9/19/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070460170-57	# of Pages:	1
File Date:	7/2/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080514441-09	# of Pages:	1

<b>File Date:</b>	7/30/2008	<b>Effective Date:</b>	
08/09			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20090396003-02	<b># of Pages:</b>	1
<b>File Date:</b>	4/30/2009	<b>Effective Date:</b>	
09-10			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20100743536-41	<b># of Pages:</b>	1
<b>File Date:</b>	10/1/2010	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20120161554-67	<b># of Pages:</b>	1
<b>File Date:</b>	2/29/2012	<b>Effective Date:</b>	
11-12			
<b>Action Type:</b>	Miscellaneous		
<b>Document Number:</b>	20140100571-31	<b># of Pages:</b>	1
<b>File Date:</b>	2/10/2014	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Reinstatement		
<b>Document Number:</b>	20140100572-42	<b># of Pages:</b>	1
<b>File Date:</b>	2/10/2014	<b>Effective Date:</b>	
rein			
<b>Action Type:</b>	Acceptance of Registered Agent		
<b>Document Number:</b>	20140100573-53	<b># of Pages:</b>	1
<b>File Date:</b>	2/10/2014	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20150148931-14	<b># of Pages:</b>	1
<b>File Date:</b>	3/31/2015	<b>Effective Date:</b>	
(No notes for this action)			



**INITIAL/ANNUAL LIST OF MANAGERS OR MANAGING MEMBERS AND STATE BUSINESS LICENSE APPLICATION OF:**

11000 RENO HIGHWAY, FALLON, L.L.C.

ENTITY NUMBER  
E0363852005-8

NAME OF LIMITED-LIABILITY COMPANY

FOR THE FILING PERIOD OF **JUN, 2014** TO **JUN, 2015**



\*100402\*

USE BLACK INK ONLY - DO NOT HIGHLIGHT

**\*\*YOU MAY FILE THIS FORM ONLINE AT [www.nvsvllverflume.gov](http://www.nvsvllverflume.gov)\*\***

Return one file stamped copy. (If filing not accompanied by order instructions, file stamped copy will be sent to registered agent.)

**IMPORTANT:** Read instructions before completing and returning this form.

Filed in the office of <i>Barbara K. Cegavske</i>	Document Number <b>20150148931-14</b>
Barbara K. Cegavske Secretary of State State of Nevada	Filing Date and Time <b>03/31/2015 5:10 PM</b>
	Entity Number <b>E0363852005-8</b>

(E-File Submission Was Made Electronically)  
ABOVE SPACE IS FOR OFFICE USE ONLY

- Print or type names and addresses, either residence or business, for all manager or managing members. A Manager, or if none, a Managing Member of the LLC must sign the form. **FORM WILL BE RETURNED IF UNSIGNED.**
- If there are additional managers or managing members, attach a list of them to this form.
- Return completed form with the fee of \$125.00. A \$75.00 penalty must be added for failure to file this form by the deadline. An annual list received more than 90 days before its due date shall be deemed an amended list for the previous year.
- State business license fee is \$200.00. Effective 2/1/2010, \$100.00 must be added for failure to file form by deadline.
- Make your check payable to the Secretary of State.
- Ordering Copies:** If requested above, one file stamped copy will be returned at no additional charge. To receive a certified copy, enclose an additional \$30.00 per certification. A copy fee of \$2.00 per page is required for each additional copy generated when ordering 2 or more file stamped or certified copies. Appropriate instructions must accompany your order.
- Return the completed form to: Secretary of State, 202 North Carson Street, Carson City, Nevada 89701-4201, (775) 684-5708.
- Form must be in the possession of the Secretary of State on or before the last day of the month in which it is due. (Postmark date is not accepted as receipt date.) Forms received after due date will be returned for additional fees and penalties. Failure to include annual list and business license fees will result in rejection of filing.

**ANNUAL LIST FILING FEE: \$125.00 LATE PENALTY: \$75.00 (if filing late) BUSINESS LICENSE FEE: \$200.00 LATE PENALTY: \$100.00 (if filing late)**

**CHECK ONLY IF APPLICABLE AND ENTER EXEMPTION CODE IN BOX BELOW**

Pursuant to NRS Chapter 76, this entity is exempt from the business license fee. Exemption code:

- NRS 76.020 Exemption Codes**
- 001 - Governmental Entity
  - 005 - Motion Picture Company
  - 006 - NRS 680B.020 Insurance Co.

**NOTE:** If claiming an exemption, a notarized Declaration of Eligibility form must be attached. Failure to attach the Declaration of Eligibility form will result in rejection, which could result in late fees.

NAME <b>SEAN S FAYEGHI</b>		MANAGER OR MANAGING MEMBER	
ADDRESS <b>1401 LAS VEGAS BLVD SOUTH , USA</b>	CITY <b>LAS VEGAS</b>	STATE <b>NV</b>	ZIP CODE <b>89104</b>
NAME <b>SHA REZAIIE</b>		MANAGER OR MANAGING MEMBER	
ADDRESS <b>2242 CASSATT DR , USA</b>	CITY <b>LAS VEGAS</b>	STATE <b>NV</b>	ZIP CODE <b>89074</b>
NAME <b>REZA ZANDIAN</b>		MANAGER OR MANAGING MEMBER	
ADDRESS <b>PO BOX 927674 , USA</b>	CITY <b>SAN DIEGO</b>	STATE <b>CA</b>	ZIP CODE <b>92192-7674</b>
NAME		MANAGER OR MANAGING MEMBER	
ADDRESS	CITY	STATE	ZIP CODE

None of the managers or managing members identified in the list of managers and managing members has been identified with the fraudulent intent of concealing the identity of any person or persons exercising the power or authority of a manager or managing member in furtherance of any unlawful conduct.

I declare, to the best of my knowledge under penalty of perjury, that the information contained herein is correct and acknowledge that pursuant to NRS 239.330, it is a category C felony to knowingly offer any false or forged instrument for filing in the Office of the Secretary of State.

**X** SEAN FAYEGHI  
Signature of Manager, Managing Member or Other Authorized Signature

Title: **MANAGING MEMBER** Date: **3/31/2015 5:09:55 PM**

# Exhibit 4

Exhibit 4

# STAGECOACH VALLEY LLC.

Business Entity Information			
Status:	Active	File Date:	4/9/2007
Type:	Domestic Limited-Liability Company	Entity Number:	E0263162007-6
Qualifying State:	NV	List of Officers Due:	4/30/2016
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20071497897	Business License Exp:	4/30/2016

Registered Agent Information			
Name:	STATE AGENT AND TRANSFER SYNDICATE, INC.	Address 1:	112 NORTH CURRY STREET
Address 2:		City:	CARSON CITY
State:	NV	Zip Code:	89703-4934
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent - Corporation		
Jurisdiction:	NEVADA	Status:	Active

Financial Information	
No Par Share Count:	0
Capital Amount:	\$ 0
<b>No stock records found for this company</b>	

- Officers		<input checked="" type="checkbox"/> Include Inactive Officers	
<b>Managing Member - BIJAN AKHAVAN</b>			
Address 1:	112 NORTH CURRY STREET	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Active	Email:	
<b>Managing Member - BIJAN AKHAVAN</b>			
Address 1:	112 NORTH CURRY STREET	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Historical	Email:	
<b>Managing Member - SASSAN CHAKAMIAN</b>			
Address 1:	112 NORTH CURRY STREET	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	

Status:	Active	Email:	
<b>Managing Member - SASSAN CHAKAMIAN</b>			
Address 1:	112 NORTH CURRY STREET	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Historical	Email:	
<b>Managing Member - REZA ZANDIAN</b>			
Address 1:	112 NORTH CURRY STREET	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Historical	Email:	

<b>- Actions/Amendments</b>			
Action Type:	Articles of Organization		
Document Number:	20070248707-47	# of Pages:	2
File Date:	4/9/2007	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20070248709-69	# of Pages:	1
File Date:	4/9/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080270927-97	# of Pages:	1
File Date:	4/21/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090676690-55	# of Pages:	1
File Date:	9/11/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100642220-99	# of Pages:	1
File Date:	8/26/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110343835-00	# of Pages:	1
File Date:	5/6/2011	Effective Date:	
11-12			
Action Type:	Miscellaneous		
Document Number:	20140171827-13	# of Pages:	1
File Date:	3/6/2014	Effective Date:	
(No notes for this action)			

<b>Action Type:</b>	Reinstatement		
<b>Document Number:</b>	20140171828-24	<b># of Pages:</b>	1
<b>File Date:</b>	3/6/2014	<b>Effective Date:</b>	
2012-2013/2013-2014			
<b>Action Type:</b>	Acceptance of Registered Agent		
<b>Document Number:</b>	20140171829-35	<b># of Pages:</b>	1
<b>File Date:</b>	3/6/2014	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20150201806-35	<b># of Pages:</b>	1
<b>File Date:</b>	4/30/2015	<b>Effective Date:</b>	
15-16			



**INITIAL/ANNUAL LIST OF MANAGERS OR MANAGING MEMBERS AND STATE BUSINESS LICENSE APPLICATION OF:**

STAGECOACH VALLEY LLC.

ENTITY NUMBER

E0263162007-6

NAME OF LIMITED-LIABILITY COMPANY

FOR THE FILING PERIOD OF **APRIL 2015** TO **APRIL 2016**



USE BLACK INK ONLY - DO NOT HIGHLIGHT

**\*\*YOU MAY FILE THIS FORM ONLINE AT [www.nvsilverflume.gov](http://www.nvsilverflume.gov)\*\***

Return one file stamped copy. (If filing not accompanied by order instructions, file stamped copy will be sent to registered agent.)

**IMPORTANT:** Read instructions before completing and returning this form.

1. Print or type names and addresses, either residence or business, for all manager or managing members. A Manager, or if none, a Managing Member of the LLC must sign the form. **FORM WILL BE RETURNED IF UNSIGNED.**

2. If there are additional managers or managing members, attach a list of them to this form.

3. Return completed form with the fee of \$125.00. A \$75.00 penalty must be added for failure to file this form by the deadline. An annual list received more than 90 days before its due date shall be deemed an amended list for the previous year.

4. State business license fee is \$200.00. Effective 2/1/2010, \$100.00 must be added for failure to file form by deadline.

5. Make your check payable to the Secretary of State.

6. **Ordering Copies:** If requested above, one file stamped copy will be returned at no additional charge. To receive a certified copy, enclose an additional \$30.00 per certification. A copy fee of \$2.00 per page is required for each additional copy generated when ordering 2 or more file stamped or certified copies. Appropriate instructions must accompany your order.

7. Return the completed form to: Secretary of State, 202 North Carson Street, Carson City, Nevada 89701-4201, (775) 684-5708.

8. Form must be in the possession of the Secretary of State on or before the last day of the month in which it is due. (Postmark date is not accepted as receipt date.) Forms received after due date will be returned for additional fees and penalties. Failure to include annual list and business license fees will result in rejection of filing.

ANNUAL LIST FILING FEE: \$125.00 LATE PENALTY: \$75.00 (if filing late) BUSINESS LICENSE FEE: \$200.00 LATE PENALTY: \$100.00 (if filing late)

ABOVE SPACE IS FOR OFFICE USE ONLY

Filed in the office of <i>Barbara K. Cegavske</i> Barbara K. Cegavske Secretary of State State of Nevada	Document Number <b>20150201806-35</b>
	Filing Date and Time <b>04/30/2015 8:12 AM</b>
	Entity Number <b>E0263162007-6</b>

CHECK ONLY IF APPLICABLE AND ENTER EXEMPTION CODE IN BOX BELOW

NRS 76.020 Exemption Codes

Pursuant to NRS Chapter 76, this entity is exempt from the business license fee. Exemption code:

- 001 - Governmental Entity
- 005 - Motion Picture Company
- 006 - NRS 680B.020 Insurance Co.

NOTE: If claiming an exemption, a notarized Declaration of Eligibility form must be attached. Failure to attach the Declaration of Eligibility form will result in rejection, which could result in late fees.

NAME BIJAN AKHAVAN	MANAGER OR MANAGING MEMBER		
ADDRESS 112 NORTH CURRY STREET	CITY CARSON CITY	STATE NV	ZIP CODE 89703
NAME SASSAN CHAKAMIAN	MANAGER OR MANAGING MEMBER		
ADDRESS 112 NORTH CURRY STREET	CITY CARSON CITY	STATE NV	ZIP CODE 89703
NAME REZA ZANDIAN	MANAGER OR MANAGING MEMBER		
ADDRESS 112 NORTH CURRY STREET	CITY CARSON CITY	STATE NV	ZIP CODE 89703
NAME	MANAGER OR MANAGING MEMBER		
ADDRESS	CITY	STATE	ZIP CODE

None of the managers or managing members identified in the list of managers and managing members has been identified with the fraudulent intent of concealing the identity of any person or persons exercising the power or authority of a manager or managing member in furtherance of any unlawful conduct.

I declare, to the best of my knowledge under penalty of perjury, that the information contained herein is correct and acknowledge that pursuant to NRS 239.330, it is a category C felony to knowingly offer any false or forged instrument for filing in the Office of the Secretary of State.

**X** *Chakamian*  
Signature of Manager, Managing Member or Other Authorized Signature

Title **Managing Member** Date **4/29/2015**

Nevada Secretary of State List ManOrMem Revised: 1-5-15

# Exhibit 5

Exhibit 5

# ELKO NORTH 5TH AVE, LLC

## Business Entity Information

Status:	Default	File Date:	8/31/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0580312005-7
Qualifying State:	NV	List of Officers Due:	8/31/2014
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051442315	Business License Exp:	8/31/2014

## Registered Agent Information

Name:	STATE AGENT AND TRANSFER SYNDICATE, INC.	Address 1:	112 NORTH CURRY STREET
Address 2:		City:	CARSON CITY
State:	NV	Zip Code:	89703-4934
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Commercial Registered Agent - Corporation		
Jurisdiction:	NEVADA	Status:	Active

## Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
---------------------	---	-----------------	------

**No stock records found for this company**

## Officers

 Include Inactive Officers

Managing Member - CHAKAMIAN 2004 TRUST			
Address 1:	7590 FAY AVE, #401	Address 2:	
City:	LA JOLLA	State:	CA
Zip Code:	92037	Country:	
Status:	Historical	Email:	
Managing Member - MOINZADEH FAMILY REVOCABLE TRUST			
Address 1:	7590 FAY AVE, #401	Address 2:	
City:	LA JOLLA	State:	CA
Zip Code:	92037	Country:	
Status:	Historical	Email:	
Manager - REZA ZANDIAN			
Address 1:	112 NORTH CURRY STREET	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	USA



<b>Status:</b>	Active	<b>Email:</b>	
<b>Managing Member - REZA ZANDIAN</b>			
<b>Address 1:</b>	P.O. BOX 927674	<b>Address 2:</b>	
<b>City:</b>	SAN DIEGO	<b>State:</b>	CA
<b>Zip Code:</b>	92192	<b>Country:</b>	USA
<b>Status:</b>	Historical	<b>Email:</b>	

- Actions\Amendments			
<b>Action Type:</b>	Articles of Organization		
<b>Document Number:</b>	20050364566-57	<b># of Pages:</b>	2
<b>File Date:</b>	8/31/2005	<b>Effective Date:</b>	
REG MAIL SAE 9-1-05			
<b>Action Type:</b>	Initial List		
<b>Document Number:</b>	20050437973-30	<b># of Pages:</b>	1
<b>File Date:</b>	9/27/2005	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20060673304-61	<b># of Pages:</b>	1
<b>File Date:</b>	10/18/2006	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20070574309-37	<b># of Pages:</b>	1
<b>File Date:</b>	8/20/2007	<b>Effective Date:</b>	
07-08			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20080564591-60	<b># of Pages:</b>	1
<b>File Date:</b>	8/25/2008	<b>Effective Date:</b>	
08/09			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20090676691-66	<b># of Pages:</b>	1
<b>File Date:</b>	9/11/2009	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Annual List		
<b>Document Number:</b>	20100642221-00	<b># of Pages:</b>	1
<b>File Date:</b>	8/26/2010	<b>Effective Date:</b>	
(No notes for this action)			
<b>Action Type:</b>	Miscellaneous		
<b>Document Number:</b>	20140116023-30	<b># of Pages:</b>	1
<b>File Date:</b>	2/14/2014	<b>Effective Date:</b>	
CERT OF REIN			
<b>Action Type:</b>	Reinstatement		

<b>Document Number:</b>	20140116024-41	<b># of Pages:</b>	1
<b>File Date:</b>	2/14/2014	<b>Effective Date:</b>	
<b>REIN</b>			
<b>Action Type:</b>	Acceptance of Registered Agent		
<b>Document Number:</b>	20140116025-52	<b># of Pages:</b>	1
<b>File Date:</b>	2/14/2014	<b>Effective Date:</b>	
<b>(No notes for this action)</b>			

# Exhibit 6

Exhibit 6

DOC# 526743  
10/15/2014 01:29PM

Official Record  
Requested By  
FIRST CENTENNIAL - RENO  
Lyon County - NV  
Mary C. Milligan - Recorder  
Page: 1 of 4 Fee: \$17.00  
Recorded By DLW RPTT: \$105.30

A. P. No. 021-451-22  
No. 17728

R.P.T.T. \$ 105.30

When recorded mail to:

Allied FCL Svcs  
1000 Caughlin Crossing, Ste 30  
Reno, NV 89519

Mail tax statements to:

Jack G. Arnold  
3402 "I" St N.E.  
Auburn, WA 98002  
H-101

AFFIRMATION PURSUANT TO  
NRS 111.312(1) (2) AND 239B.030(4)

Pursuant to NRS 239B.030, the undersigned, hereby affirm(s) that the below document, including any exhibits, hereby submitted for recording does not contain the social security number of any person or persons.

TRUSTEE'S DEED

THIS INDENTURE, made and entered into on September 26, 2014, by and between ALLIED 1031 EXCHANGE, a Nevada corporation, dba ALLIED FORECLOSURE SERVICES, as Trustee, party of the first part, and JACK G. ARNOLD, an unmarried man, party of the second part, whose address is: 3402 "I" St N.E., Auburn, WA 98002 H-101.

WITNESSETH:

WHEREAS, REZA ZANDIAN and NILOOFAR FOUGHANI, husband and wife executed a Promissory Note payable to the order of JACK G. ARNOLD, an unmarried man in the principal sum of \$32,050.00, and bearing interest, and as security for the payment of said Promissory Note said REZA ZANDIAN and NILOOFAR FOUGHANI, husband and wife, as Trustor, executed a certain Deed of Trust to FIRST AMERICAN TITLE COMPANY OF NEVADA, Trustee for JACK G. ARNOLD, an unmarried man, Beneficiary, which Deed of Trust was dated June 23, 2005,



and was recorded July 19, 2005, as Document No. 356792, Official Records, Lyon County, Nevada; and

WHEREAS, the terms and conditions of the Promissory Note were amended and modified pursuant to that certain Amendment to the Installment Note dated January 20, 2010, signed by Trustor and Beneficiary; and

WHEREAS, the terms and conditions of the Promissory Note were further amended and modified pursuant to that certain Modification Agreement dated February 4, 2011, signed by Trustor and Beneficiary; and

WHEREAS, ALLIED 1031 EXCHANGE, dba ALLIED FORECLOSURE SERVICES, was substituted as Trustee in the place and stead of FIRST AMERICAN TITLE COMPANY OF NEVADA, by document recorded May 12, 2014, as Document No. 521092, Official Records, Lyon County, Nevada; and

WHEREAS, a breach of the obligation for which such transfer in trust as security was made occurred in that default was made in the failure to pay the installment of principal and interest due on September 1, 2011, in the failure to pay each payment of principal and interest that thereafter became due and in the failure to pay Real Property Taxes for fiscal years 2013-2014, which became a lien on the trust premises and were advanced by the Beneficiary; and

WHEREAS, JACK G. ARNOLD, an unmarried man executed and acknowledged a Notice of Default and Election To Sell the property described in said Deed of Trust to satisfy said indebtedness, and said Notice of Default and Election To Sell was recorded May 12, 2014, as Document No. 521093, Official Records, Lyon County, Nevada; and

WHEREAS, on May 15, 2014, a copy of said Notice of Default and Election To Sell was mailed by certified mail to the then owner of the property hereinafter described and to all other parties entitled by law to such notice; and

WHEREAS, by direction of JACK G. ARNOLD, an unmarried man the said ALLIED 1031 EXCHANGE, dba ALLIED FORECLOSURE SERVICES, Trustee, gave due and legal notice in each and every manner required by said Deed of Trust and provided by



law that it would on the 26th day of September, 2014, at the hour of 11:00 o'clock A.M., sell at the front entrance to the Lyon County Courthouse, located at 31 S. Main Street, in Yerington, Lyon County, Nevada, at public auction to the highest cash bidder in lawful money of the United States of America, the realty described in said Deed of Trust to satisfy the indebtedness due under said Deed of Trust and the Promissory Note secured by it; that said Notice of Sale was recorded on August 29, 2014, as Document No. 524868, Official Records, Lyon County, Nevada; that said Notice of Sale was published in the Mason Valley News in its issues dated September 3, 2014, September 10, 2014 and September 17, 2014, and said Notice of Sale was posted in a public place, in Yerington, Nevada namely, at the Lyon County Courthouse, on August 29, 2014; and

WHEREAS, on August 28, 2014 a copy of said Notice of Sale was mailed by certified mail to the then owner of the property hereinafter described and to all other parties entitled by law to such notice; and

WHEREAS, at the time and place so set for said sale said party of the second part did bid the sum of TWENTY SEVEN THOUSAND AND NO/100 DOLLARS (\$27,000.00) for said property, and said sum was the highest and best bid therefor;

NOW, THEREFORE, for and in consideration of the said sum of \$27,000.00, the said party of the first part, as Trustee, under and by virtue of the authority vested in it by said Deed of Trust, does hereby grant, bargain, sell and convey, without warranty, unto the party of the second part, and to their heirs, successors, and assigns, all that certain real property situate in the County of Lyon, State of Nevada, that is described as follows:

The Southeast 1/4 of the Southeast 1/4, of Section 21, Township 19 North, Range 25 East, M.D.B.&M.

Except therefrom all petroleum, oil, natural gas and products derived therefrom as reserved in deed, recorded October 6, 1958, in Book 41 of Deeds, Page 576, Lyon County, Nevada records.



526743

10/15/2014  
4 of 4

NOTE (NRS 111.312): The above metes and bounds description previously appeared in Deed recorded July 19, 2005, as Document No. 356791, Official Records of Lyon County, Nevada.

TOGETHER WITH the improvements thereon, and all and singular the tenements, hereditaments and appurtenances thereunto belonging or appertaining, and the reversion and reversions, remainder and remainders, rents, issues and profits thereof.

TO HAVE AND TO HOLD the said premises, together with the appurtenances, unto the said party of the second part, and to his heirs, successors, and assigns forever.

IN WITNESS WHEREOF, the party of the first part has caused this conveyance to be executed the day and year first above written.

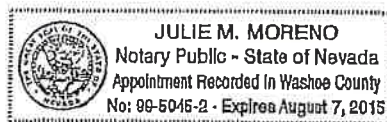
ALLIED 1031 EXCHANGE, dba  
ALLIED FORECLOSURE SERVICES

By: Geneva Martinko  
Geneva Martinko  
Its: Secretary

STATE OF NEVADA            )  
  ) ss  
COUNTY OF WASHOE        )

This instrument was acknowledged before me on 10/6/14, 2014, by Geneva Martinko as Secretary of ALLIED 1031 EXCHANGE, dba ALLIED FORECLOSURE SERVICES.

Julie M. Moreno  
Notary Public





STATE OF NEVADA
DECLARATION OF VALUE

Official Record

Requested By
FIRST CENTENNIAL - RENO

Lyon County - NV

Mary C. Milligan - Recorder

Page: 1 of 1 Fee: \$17.00

Recorded By DLW RPTT: \$105.30

1. Assessor Parcel Number (s)

- a) 021-451-22
b)
c)
d)

2. Type of Property:

- a) [x] Vacant Land b) [ ] Single Fam Res.
c) [ ] Condo/Twnhse d) [ ] 2-4 Plex
e) [ ] Apt. Bldg. f) [ ] Comm'/Ind'l
g) [ ] Agricultural h) [ ] Mobile Home
i) [ ] Other

FOR RECORDERS OPTIONAL USE ONLY
Notes: DLW/AT

3. Total Value/Sales Price of Property:

Deed in Lieu of Foreclosure Only (value of property) \$ 27,000.00
Transfer Tax Value: \$ 27,000.00
Real Property Transfer Tax Due: \$ 105.30

4. If Exemption Claimed:

- a. Transfer Tax Exemption, per NRS 375.090, Section: includes costs
b. Explain Reason for Exemption:

5. Partial Interest: Percentage being transferred: 100 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature C. Wood, FCL Ass't Capacity Justice
Signature Capacity

SELLER (GRANTOR) INFORMATION BUYER (GRANTEE) INFORMATION

(REQUIRED) (REQUIRED)
Print Name: Allied FCL Svcs Print Name: Jack G. Arnold
Address: 1000 Caughlin Crossing, Address: 3402 "I" St N.E.
City: Reno Ste 30 City: Auburn
State: NV Zip: 89519 State: WA Zip: 98002 H 101

COMPANY/PERSON REQUESTING RECORDING

(REQUIRED IF NOT THE SELLER OR BUYER)
Print Name: First Centennial Title Co Escrow # 204550
Address: 320 W. Winnie Ln, Ste 102
City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED)

# Exhibit 7

Exhibit 7

DOC # 521532

05/21/2014 02:50 PM

Official Record

Requested By  
A+ PARALEGALS INC

Lyon County - NV

Mary C. Milligan - Recorder

Page 1 of 4 Fee: \$17.00

Recorded By: BKC RPTT:

APN: 006-052-04, 006-052-05, 006-052-06

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY


GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN a married man as his sole and separate property, to my son ALBORZ ZANDIAN, an unmarried man, 20%, and my wife NILOOFAR FOUGHANI ZANDIAN, 60%, as joint tenants with right of survivorship (per financial agreement entered into in Las Vegas, Nevada and dated August 21, 2003).

The land referred to herein is situated in the State of Nevada, Lyon County, described as follows:

See Exhibit "A" attached hereto and made a part hereof.

May 20, 2014

  
Signature: Reza Zandian

**"UNOFFICIAL COPY"**

-LOOSE CERTIFICATE ATTACHED



521532

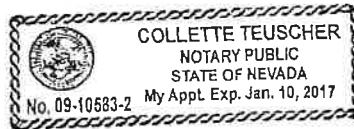
05/21/2014  
002 of 4

State of Nevada  
Carson City

On May 20, 2014 before me, a notary public personally appeared Reza Zandian who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Collette Teuscher  
Notary Public

THIS ACKNOWLEDGMENT IS ATTACHED TO A GRANT DEED  
Dated May 20, 2014

**"UNOFFICIAL COPY"**



521532

05/21/2014  
003 of 4

EXHIBIT "A"

All that certain real property situate in the County of Lyon, State of Nevada, described as follows:

**PARCEL 1:**

A parcel of land located within Section 23, Township 16 North, Range 21 East, M.D.B.&M., Lyon County, Nevada and more particularly described as follows:

Commencing at a 1/8" rebar marking the North 1/4 corner of said Section 23; thence South 14°56'21" East, a distance of 2,668.37 feet to the Southeast corner of the parcel being the true point of beginning; thence North 13°53'54" West, a distance of 63.33 feet; thence South 76°01'06" West, a distance of 150.00 feet, thence South 13°58'54" East, a distance of 63.33 feet, thence North 76°01'06" East, a distance of 150.00 feet to the true point of beginning.

Said property further described as Lot 2 of that certain Record of Survey and Boundary Adjustment for Block 6 of Dayton, recorded as Official Record No. 90448, Lyon County Nevada Records.

**PARCEL 2:**

A parcel of land located within Section 23, Township 16 North, Range 21 East, M.D.B.&M., Lyon County, Nevada and more particularly described as follows:

Commencing at a 5/8" rebar marking the North 1/4 corner of said Section 23; thence South 14°55'02" East, a distance of 2,731.69 feet to the Southeast corner of the parcel being the true point of beginning; thence North 13°58'54" West, a distance of 63.33 feet; thence South 76°01'06" West, a distance of 150.00 feet, thence South 13°58'54" East, a distance of 63.33 feet, thence North 76°01'06" East, a distance of 150.00 feet to the true point of beginning.

The basis of bearing is the North line of the Northwest Quarter of said Section 23, which bears West as per record.

Said property further described as Lot 5 of that certain Record of Survey and Boundary Adjustment for Block 6 of Dayton, recorded as Official Records of Lyon County, Nevada Document No. 90448.

**PARCEL 3:**

A parcel of land located within Section 23, Township 16 North, Range 21 East, M.D.B.&M., Lyon County, Nevada and more particularly described as follows:

Commencing at a 5/8" rebar marking the North 1/4 corner of said Section 23; thence South 14°53'45" East, a distance of 2,795.02 feet to the Southeast corner of the parcel being the true point of beginning; thence North 13°58'54" West, a distance of 63.34 feet; thence South



521532

05/21/2014  
004 of 4

76°01'06" West, a distance of 150.00 feet, thence South 13°53'54" East, a distance of 63.34 feet, thence North 76°01'06" East, a distance of 150.00 feet to the true point of beginning.

The basis of bearing in the North line of the Northwest Quarter of said Section 23, which bears West as per record.

Said property further described as Lot 6 of that certain Record of Survey and Boundary Adjustment for Block 6 of Dayton, recorded as Official Records of Lyon County, Nevada as Document No. 129448.

Note: Legal description previously contained in document recorded February 25, 1987 as Document No. 125662 and document recorded December 21, 1989 As Document No. 129843.

**"UNOFFICIAL COPY"**



DOC # DV-521532

05/21/2014 02:50 PM

Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Requested By  
A+ PARALEGALS INC

Lyon County - NV  
Mary C. Milligan - Recorder

Page 1 of 1 Fee: \$17.00  
Recorded By: BKC RPTT:

- 1. Assessors Parcel Number(s)
  - a) 006-052-04
  - b) 006-052-05
  - c) 006-052-06
  - d) \_\_\_\_\_

- 2. Type of Property:
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Townhouse
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agriculture
  - h)  Mobile Home
  - i)  Other \_\_\_\_\_

**FOR RECORDERS OPTIONAL USE ONLY**

DOCUMENT/INSTRUMENT #: \_\_\_\_\_

BOOK \_\_\_\_\_ PAGE \_\_\_\_\_

DATE OF RECORDING: \_\_\_\_\_

NOTES: \_\_\_\_\_

*M*

3. Total Value/Sales Price of Property: \$ \_\_\_\_\_

Deed in Lieu of Foreclosure Only (value of property) ( \_\_\_\_\_

Transfer Tax Value: \$ \_\_\_\_\_

Real Property Transfer Tax Due: \$ 0

- 4. If Exemption Claimed:
  - a. Transfer Tax Exemption per NRS 375.095 Section # 5
  - b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of legal consanguinity or affinity: adding son & wife
- 5. Partial Interest: Percentage being transferred: 80 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantor

Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Reza Zandian

Address: 6 rue Edouard Fournier

City: 75116 Paris, France

State: \_\_\_\_\_ Zip: \_\_\_\_\_

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Alborz Zandian & Niloofar Foughani

Address: 6 rue Edouard Fournier

City: 75116 Paris, France

State: \_\_\_\_\_ Zip: \_\_\_\_\_

COMPANY/PERSON REQUESTING RECORDING

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_

Address: 312 W. Fourth Street

City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)



# Exhibit 8

Exhibit 8

DOC # 521533

05/21/2014 02:51 PM

Official Record

Requested By  
A+ PARALEGALS INC

Lyon County - NV

Mary C. Milligan - Recorder

Page 1 of 2 Fee: \$15.00

Recorded By: BKC RPTT:

APN: 015-311-02

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofer Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN 25% of REZA ZANDIAN and NILOOFAR FOUGHANI husband and wife, as Join Tenants Right of Survivorship as to an undivided 50% interest, to my son ALBORZ ZANDIAN, an unmarried man, 5%, and my wife NILOOFAR FOUGHANI ZANDIAN, 15% as joint tenants with right of survivorship, all as tenants in common, (per financial agreement entered into in Las Vegas, Nevada and dated August 21,2003).

The land referred to herein is situated in the State of Nevada, Lyon County, described as follows:

**THE WEST HALF (W1/2) OF THE SOUTHWEST QUARTER (SW1/4) OF SECTION 11, TOWNSHIP 17 NORTH, RANGE 13 EAST, M.D.B.&M.**

Together with all tenements, hereditaments and appurtenances including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

May 20, 2014

*(Handwritten signature)*  
Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED



521533

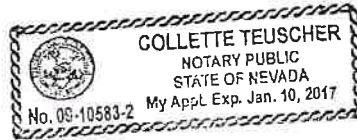
05/21/2014  
002 of 2

State of Nevada  
Carson City

On May 20, 2014 before me, a notary public personally appeared Reza Zandian who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Collette Teuscher  
Notary Public

THIS ACKNOWLEDGMENT IS ATTACHED TO A GRANT DEED  
Dated May 20, 2014

**"UNOFFICIAL COPY"**

DOC # DV-521533

05/21/2014 02:51 PM

Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Requested By  
A+ PARALEGALS INC

Lyon County - NV  
Mary C. Milligan - Recorder

Page 1 of 1 Fee: \$15.00  
Recorded By: BKC RPTT:

- 1. Assessors Parcel Number(s)
  - a) 015-311-02
  - b) \_\_\_\_\_
  - c) \_\_\_\_\_
  - d) \_\_\_\_\_

- 2. Type of Property
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Twnh
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agriculture
  - h)  Mobile Home
  - i)  Other

**FOR RECORDERS OPTIONAL USE ONLY**

DOCUMENT/INSTRUMENT #: \_\_\_\_\_  
 BOOK \_\_\_\_\_ PAGE \_\_\_\_\_  
 DATE OF RECORDING: \_\_\_\_\_  
 NOTES: \_\_\_\_\_

- 3. Total Value/Sales Price of Property: \$ \_\_\_\_\_  
 Deed in Lieu of Foreclosure Only (Value of property) ( \_\_\_\_\_ )  
 Transfer Tax Value: \$ \_\_\_\_\_  
 Real Property Transfer Tax Due: \$ \_\_\_\_\_ 0

- 4. If Exemption Claimed:
  - a. Transfer Tax Exemption per NRS 375.060 Section # 5
  - b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding Wife and Son

- 5. Partial Interest: Percentage being transferred: 40  
 The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Reza Zandian  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Alborz Zandian & Niloofar Foughani  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

COMPANY/PERSON REQUESTING RECORDING

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
 Address: 312 W. Fourth Street  
 City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 9

Exhibit 9

DOC # 521531

05/21/2014 02:49 PM

Official Record

Requested By  
A+ PARALEGALS INC

Lyon County - NV  
Mary C. Milligan - Recorder

Page 1 of 3 Fee: \$16.00  
Recorded By: BKC RPTT:

APN: 015-311-18 and 015-311-19

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

312 W Fourth St  
Carson City, NV  
89703

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN 12.5% of REZA ZANDIAN and NILOOFAR FOUGHANI husband and wife, as to an undivided 25% interest, to my son ALBORZ ZANDIAN, an unmarried man, 2.5%, and my wife NILOOFAR FOUGHANI ZANDIAN, 7.5%, as joint tenants with right of survivorship and to the heirs and assigns of such Grantees forever (per financial agreement entered into in Las Vegas, Nevada and dated August 21,2003), all that real property situated in the County of Lyon, State of Nevada, bounded and described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

Together with all and singular the tenements, hereditaments and appurtenances, thereunto belonging or in anywise appertaining, and any reversions, remainders, rents, issues or profits thereof.

May 20, 2014

Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED



521531

05/21/2014  
002 of 3

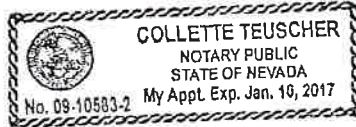
State of Nevada  
Carson City

On May 20, 2014 before me, a notary public personally appeared Reza Zandian who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Collette Teuscher  
Notary Public



THIS ACKNOWLEDGMENT IS ATTACHED TO A GRANT DEED  
Dated May 20, 2014

**"UNOFFICIAL COPY"**





521531

05/21/2014  
003 of 3

EXHIBIT "A"

LEGAL DESCRIPTION

The land referred to herein is situated in the State of Nevada, County of Lyon described as follows:

**PARCEL ONE:**

THE REAL PROPERTY SITUATED IN THE E 1/2 OF SECTION 10 TOWNSHIP 17 N, RANGE 23 E, M.D.B.&M., COUNTY OF LYON, STATE OF NEVADA, DESCRIBED AS FOLLOWS:

NORTH PARCEL AS SHOWN ON THE RECORD OF SURVEY MAP FOR DEAD DOG RANCH, RECORDED IN THE OFFICIAL RECORDS OF LYON COUNTY, NEVADA ON SEPTEMBER 30, 2003 AS DOCUMENT 332209.

APN 15-311-19

**PARCEL TWO:**

THE REAL PROPERTY SITUATED IN THE S 1/2 OF SECTION 10 TOWNSHIP 17 N, RANGE 23 E, M.D.B.&M., COUNTY OF LYON, STATE OF NEVADA, DESCRIBED AS FOLLOWS:

SOUTH PARCEL AS SHOWN ON THE RECORD OF SURVEY MAP FOR DEAD DOG RANCH, RECORDED IN THE OFFICIAL RECORDS OF LYON COUNTY, NEVADA ON SEPTEMBER 30, 2003 AS DOCUMENT 332209.

APN 15-311-18

"UNOFFICIAL COPY"

DOC # DV-521531

05/21/2014 02:49 PM

Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Requested By  
A+ PARALEGALS INC

Lyon County - NV

Mary C. Milligan - Recorder

Page 1 of 1 Fee: \$16.00  
Recorded By: BKC RPTT:

- 1. Assessors Parcel Number(s)
  - a) 015-311-18, 19
  - b) \_\_\_\_\_
  - c) \_\_\_\_\_
  - d) \_\_\_\_\_

- 2. Type of Property:
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Twnhse
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agricultural
  - h)  Mobile Home
  - i)  Other \_\_\_\_\_

<b>FOR RECORDERS OPTIONAL USE ONLY</b>	
DOCUMENT/INSTRUMENT #:	_____
BOOK _____	PAGE _____
DATE OF RECORDING:	_____
NOTES:	_____
	<u>AI</u>

- 3. Total Value/Sales Price of Property: \$ \_\_\_\_\_
- Deed in Lieu of Foreclosure (Only if value of property) ( \_\_\_\_\_
- Transfer Tax Value: \$ \_\_\_\_\_
- Real Property Transfer Tax Due: \$ 0

- 4. If Exemption Claimed:
  - a. Transfer Tax Exemption per NRS 375.060 Section # 5
  - b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding Wife and Son

5. Partial Interest: Percentage being transferred: 20 %  
 The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Reza Zandian  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Alborz Zandian & Niloofar Foughani  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

COMPANY/PERSON REQUESTING RECORDING

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
 Address: 312 W. Fourth Street  
 City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 10

Exhibit 10

DOC # 342193

02/04/2005 01:15 PM

Official Record

Requested By  
NORTHERN NEVADA TITLE

Lyon County - NV

Mary C. Milligan - Recorder

Page 1 of 4 Fee: \$17.00

Recorded By: DLW RPTT: \$585.00

A.P.N. 6-052-04, 05 & 06  
Escrow No.: LY-1041025-CE  
303769-TO

RECORDING REQUESTED BY:

Northern Nevada Title Company

MAIL TAX STATEMENTS AND WHEN  
RECORDED, MAIL TO:

Reza Zandian

8775 Costa Verde Blvd. #1416  
San Diego, CA 92122



0342193

THIS SPACE FOR RECORDER'S USE ONLY

The undersigned hereby declare(s):

Documentary transfer tax of \$ 585.00, computed on full value of property conveyed.

**GRANT, BARGAIN, SALE DEED**

That Julian C. Smith Jr., LTD, Defined Pension Trust and Julian C. Smith, Jr. and Joanna Smith, Husband and Wife as Joint Tenants and Smith and Harmer, LTD, Profit Sharing Plan in consideration of \$10.00 Dollars, the receipt of which is hereby acknowledged, do(es) hereby Grant, Bargain, Sell and Convey to Reza Zandian, a Married Man as his Sole and Separate Property all that said property in the County of Lyon, State of Nevada, bounded and described as follows:

Exact and Complete Legal Description is Attached hereto and made a part hereof.

Together with all singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining.

Dated: January 31, 2005

UNOFFICIAL COPY



342193

02/04/2005  
002 of 4

Julian C. Smith Jr., LTD, Defined Pension Trust

By: Julian C. Smith Jr.  
Julian C. Smith, Jr., Trustee

Julian C. Smith Jr.  
Julian C. Smith, Jr.

Joanna Smith  
Joanna Smith

Smith and Harner, LTD., Profit Sharing Plan

By: Julian C. Smith Jr.  
Julian C. Smith, Its Authorized Agent

STATE OF NEVADA )

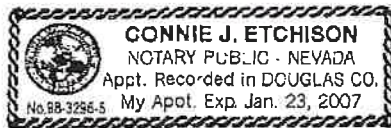
COUNTY OF Carson City )

On 2-2-05 personally appeared before me, a Notary Public

JULIAN C. SMITH JR. AND JOANNA SMITH

who acknowledged that they executed the above instrument.

Signature Connie J. Etchison  
(Notary Public)



"UNOFFICIAL COPY"



342193

02/04/2005  
003 of 4

EXHIBIT "A"

All that certain real property situate in the County of Lyon, State of Nevada, described as follows:

PARCEL 1:

A parcel of land located within Section 23, Township 16 North, Range 21 East, M. D. B. &M., Lyon County, Nevada, and more particularly described as follows:

Commencing at a 5/8" rebar marking the North 1/4 corner of said Section 23; thence South 14° 56' 21" East, a distance of 2,668.33 feet to the Southeast corner of the parcel being the true point of beginning; thence North 13° 53' 54" West, a distance of 63.33 feet; thence South 76° 01' 06" West, a distance of 150.00 feet; thence South 13° 58' 54" East, a distance of 63.33 feet; thence North 76° 01' 06" East, a distance of 150.00 feet to the true point of beginning.

Said property further described as Lot 4 of that certain Record of Survey and Boundary Adjustment for Block 6 of Dayton, recorded as Official Record No. 90448, Lyon County Nevada Records.

PARCEL 2:

A parcel of land located within Section 23, Township 16 North, Range 21 East, M. D. B. &M., Lyon County, Nevada, and more particularly described as follows:

Commencing at a 5/8" rebar marking the North 1/4 corner of said Section 23; thence South 14° 55' 02" East, a distance of 2,731.69 feet to the Southeast corner of the parcel being the true point of beginning; thence North 13° 58' 54" West, a distance of 63.33 feet; thence South 76° 01' 06" West, a distance of 150.00 feet; thence South 13° 58' 54" East, a distance of 63.33 feet; thence North 76° 01' 06" East, a distance of 150.00 feet to the true point of beginning.

The basis of bearing is the North line of the Northwest Quarter of said Section 23, which bears West as per record.

Said property further described as Lot 5 of that certain Record of Survey and Boundary Adjustment of Block 6 of Dayton, recorded in the Official Records of Lyon County, Nevada as Document No. 90448.

Continued...





342193

02/04/2005  
004 of 4

Exhibit "A"

PARCEL 3:

A parcel of land located within Section 23, Township 16 North, Range 21 East, M. D. B. &M., Lyon County, Nevada and more particularly described as follows:

Commencing at a 1/8" rebar marking the North 1/4 corner of said Section 23; thence South 14° 53' 45" East, a distance of 2,795.02 feet to the Southeast corner of the parcel being the true point of beginning; thence North 13° 58' 54" West, a distance of 63.34 feet; thence South 76° 01' 06" West, a distance of 150.00 feet; thence South 13° 53' 54" East, a distance of 63.34 feet; thence North 76° 01' 06" East, a distance of 150.00 feet to the true point of beginning.

The basis of bearing in the Northwest line of the Northwest Quarter of said Section 23, which bears West as per record.

Said property further described as Block 6 of that certain Record of Survey and Boundary Adjustment for Block 6 of Dayton, recorded in the Official Records of Lyon, County, Nevada as Document No. 90448.

Note: Legal description previously contained in document recorded February 25, 1987 as Document No. 105663 and document recorded December 7, 1988 as Document No. 129843.

DA: DC4

**"UNOFFICIAL COPY"**



Requested By  
NORTHERN NEVADA TITLE

Lyon County - NV  
Mary C. Milligan - Recorder

Page 1 of 1 Fee: \$17.00  
Recorded By: DLW RPTT: \$585.00

FOR RECORDED
Document/In:
Book: _____
Date of Record:
Notes: _____

State of Nevada Declaration of Value

1. Assessor Parcel Number(s)

- a) 6-052-04, 05 & 06
- b) \_\_\_\_\_
- c) \_\_\_\_\_

2. Type of Property:

- a)  Vacant Land
- b)  Single Fam. Res.
- c)  Condo/Townhse
- d)  2-4 Plex
- e)  Apt. Bldg
- f)  Comm'l/Ind'l
- g)  Agricultural
- h)  Mobile Home
- i)  Other \_\_\_\_\_

3. Total Value/Sale Price of Property:

\$150,000.00

Deed in Lieu of Foreclosure (value of property)

\$ \_\_\_\_\_

Transfer Tax Value

\$150,000.00

Real Property Transfer Tax Due:

\$ 585.00

3. If Exemption Claimed:

a. Transfer Tax Exemption, per NRS 375.090, Section \_\_\_\_\_

b. Explain Reason for Exemption: \_\_\_\_\_

5. Partial Interest: Percentage Being Transferred: \_\_\_\_\_ %

The undersigned, declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of my information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantee

Signature John C. Smith Jr Capacity Grantor

SELLER (GRANTOR) INFORMATION

Print Name: Julian C. Smith, Jr.

Address: 502 N. Division St.

City: Carson City

State: NV Zip: 89703

BUYER (GRANTEE) INFORMATION

Print Name: Reza Zandian

Address: 8775 Costa Verde Blvd. #1009

City: San Diego

State: CA Zip: 92122

COMPANY/PERSON REQUESTING RECORDING

Co. Name: Northern Nevada Title Company

Esc. # LY-1041025-CE

Address: 512 N. Division Street

City: Carson City State: NV Zip: 89703-4103

# Exhibit 11

# Exhibit 11

DOC # 403892

04/06/2007 04:36 PM

Official Record

Requested By  
TITLE SERVICE & ESCROW

Lyon County - NV  
Mary C Milligan - Recorder

Page 1 of 2 Fee \$15.00  
Recorded By MCM RPTT \$688.35

A.P.N.. 15-311-02  
File No. 131-2296944 (CAC)  
R.P.T.T.. \$ 688.35  
TSL #31542



0403892

When Recorded Mail To: Mail Tax Statements To:

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

UNOFFICIAL COPY

**GRANT, BARGAIN and SALE DEED**

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

Shelly Forsythe, a married woman, her sole and separate property  
do(es) hereby GRANT, BARGAIN and SELL to

Reza Zandian and Niloofar Foughani, Husband and Wife as  
Joint Tenants with Right of Survivorship  
the real property situate in the County of Lyon, State of Nevada, described as follows:

**T 17 N, R 23 E, M.D.B. & M.**

**Section 11: The W 1/2 of the SW 1/4.**

Subject to

TOGETHER with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof

Date. 10/25/2006

Shelly Forsythe  
Shelly Forsythe



403892

04/06/2007  
002 of 2

STATE OF California ;  
COUNTY OF Solano ; SS.

This instrument was acknowledged before me on 12/12/06 by

Sherry Forsythe  
Jeannie Coupe

Notary Public  
(My commission expires 11/4/09)

This Notary Acknowledgement is attached to that certain Grant, Bargain Sale Deed dated **October 25, 2006** under Esrow No. **1-2296944**.



**UNOFFICIAL COPY**

Requested By  
TITLE SERVICE & ESCROW

Lyon County - NV  
Mary C Milligan - Recorder

Page 1 of 1 Fee \$15.00  
Recorded By MCM RPTT \$688.35

STATE OF NEVADA  
DECLARATION OF VALUE

1 Assessor Parcel Number(s)

- a) 15-311-02
- b) \_\_\_\_\_
- c) \_\_\_\_\_
- d) \_\_\_\_\_

2 Type of Property

- a)  Vacant Land
- b)  Single Fam Res
- c)  Condomnwnhse
- d)  2-4 Plex
- e)  Apt Bldg
- f)  Comm'l/Ind'l
- g)  Agricultural
- h)  Mobile Home
- i)  Other \_\_\_\_\_

FOR RECORDERS OPTIONAL USE

Book \_\_\_\_\_ Page \_\_\_\_\_  
 Date of Recording \_\_\_\_\_  
 Notes \_\_\_\_\_

3 Total Value/Sales Price of Property

\$176,200.00

Deed in Lieu of Foreclosure (only if value of property)

( \$ \_\_\_\_\_ )

Transfer Tax Value

\$176,200.00

Real Property Transfer Tax Due

~~\$881.18~~ 688.35

4 If Exemption Claimed:

- a Transfer Tax Exemption, per 375.090, Section \_\_\_\_\_
- b Explain reason for exemption \_\_\_\_\_

5 Partial Interest Percentage being transferred 100 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature Shelly Forsythe

Capacity Grantor

Signature \_\_\_\_\_

Capacity \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION**

**BUYER (GRANTEE) INFORMATION**

(REQUIRED)

(REQUIRED)

Print Name Shelly Forsythe

Print Name Reza Zandian

Address 1131 Lilac Ct

Address 8775 Costa Verde Blvd, Suite 501

City VACAVILLE

City San Diego

State CA Zip 95687

State CA Zip 92122

**COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)**

First American Title Company of

Print Name Nevada T&E

File Number 131-2296944 CAC/CAC

Address 1213 South Carson Street

City Carson City

State NV Zip 89701

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 12

# Exhibit 12



DOC # 344412

03/03/2005 04:05 PM

Official Record

Requested By  
STEWART TITLE CARSON  
Lyon County - NV  
Mary C. Milligan - Recorder  
Page 1 of 2 Fee: \$40.00  
Recorded By: MFK RPTT: \$2,808.00



A.P.N. # 15-311-18 & 19  
R.P.T.T. \$ 2808.  
ESCROW NO. 04023025  
RECORDING REQUESTED BY:  
**STEWART TITLE COMPANY**  
MAIL TAX STATEMENTS TO:  
**SAME AS BELOW**

WHEN RECORDED MAIL TO:  
**GRANTEE**  
8775 Costa Verde, Apt. 1416  
San Diego, CA 92122

(Space Above for Recorder's Use Only)

**GRANT, BARGAIN, SALE DEED**

THIS INDENTURE WITNESSETH THAT **DEAD DOG RANCH, LLC**

in consideration of \$10.00, the receipt of which is hereby acknowledged, does hereby Grant, Bargain Sell and Convey to **REZA ZANDIAN AND NINA FAR FOUGHANI, HUSBAND AND WIFE AS TO AN UNDIVIDED 3/6TH INTEREST, ELIAS ABRISHAMI AND MINOO ABRISHAMI, HUSBAND AND WIFE AS TO AN UNDIVIDED 2/6TH INTEREST AND ENAYAT ABRISHAMI AND NAIMA ABRISHAMI, \*** and to the heirs and assigns of such Grantee forever, all real property situated in the County of **Lyon** State of Nevada, bounded and described as:

**SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF**

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, and any reversions, remainders, rents, issues and profits thereof.

DATE: **March 01, 2005** **DEAD DOG RANCH, LLC**

BY: *Loretta McIntire*  
**LORETTA MCINTIRE**  
**OPERATING MANAGER**

BY: \_\_\_\_\_

\*husband and wife as to an undivided 1/6th interest, all held as tenants in common with each other

STATE OF Oregon }  
COUNTY OF Was } ss.

This instrument was acknowledged before me on March 1, 2005  
by LORETTA MCINTIRE



Signature *S. Gray*  
Notary Public (One Inch Margin on all sides of Document for Recorders Use Only)

UNOFFICIAL COPY





344412

03/03/2005  
002 of 2

**EXHIBIT "A"**

**LEGAL DESCRIPTION**

ESCROW NO.: 04023025

The land referred to herein is situated in the State of Nevada, County of Lyon described as follows:

**PARCEL ONE:**

THE REAL PROPERTY SITUATED IN THE E 1/2 OF SECTION 10 TOWNSHIP 17 N, RANGE 23 E, M.D.B. & M. COUNTY OF LYON, STATE OF NEVADA, DESCRIBED AS FOLLOWS:

NORTH PARCEL AS SHOWN ON THE RECORD OF SURVEY MAP FOR DEAD DOG RANCH, RECORDED IN THE OFFICIAL RECORDS OF LYON COUNTY, NEVADA ON SEPTEMBER 30, 2003 AS DOCUMENT 332209.

ASSESSORS PARCEL NO. 15-311-17

**PARCEL TWO:**

THE REAL PROPERTY SITUATED IN THE E 1/2 OF SECTION 10 TOWNSHIP 17 N, RANGE 23 E, M.D.B.&M., COUNTY OF LYON, STATE OF NEVADA, DESCRIBED AS FOLLOWS:

SOUTH PARCEL AS SHOWN ON THE RECORD OF SURVEY MAP FOR DEAD DOG RANCH, RECORDED IN THE OFFICIAL RECORDS OF LYON COUNTY, NEVADA ON SEPTEMBER 30, 2003 AS DOCUMENT 332209.

ASSESSOR'S PARCEL NO. 15-311-18

**UNOFFICIAL COPY!**

# STATE OF NEVADA DECLARATION OF VALUE



DV-344412  
03/03/2005  
002 of 2

1. Assessor Parcel Number(s):  
 a) 15-311-18 & 19  
 b) \_\_\_\_\_  
 c) \_\_\_\_\_  
 d) \_\_\_\_\_

FOR RECORDERS OPTIONAL USE ONLY	
Document/Instrument No.:	_____
Book:	_____ Page: _____
Date of Recording:	_____
Notes:	_____

2. Type of Property:  
 a) XX Vacant Land                      b) \_\_\_\_\_ Single Family Res.  
 c) \_\_\_\_\_ Condo/Townhome        d) \_\_\_\_\_ 2-4 Plex  
 e) \_\_\_\_\_ Apartment Bldg.        f) \_\_\_\_\_ Comm'l/Ind'l  
 g) \_\_\_\_\_ Agricultural            h) \_\_\_\_\_ Mobile Home  
 i) Other: \_\_\_\_\_

3. Total Value/Sales Price of Property: \$ 720,000.00  
 Deed in Lieu of Foreclosure Only (Value of Property): \$ \_\_\_\_\_  
 Transfer Tax Value: \$ 720,000.00  
 Real Property Transfer Tax Due: \$ 2808.

4. If Exemption Claimed:  
 a. Transfer Tax Exemption, per NRS 375.090, Section: \_\_\_\_\_  
 b. Explain Reason for Exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: 100

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the disallowance of any claimed exemption or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest of 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature: \_\_\_\_\_ Capacity: \_\_\_\_\_

Signature: \_\_\_\_\_ Capacity: \_\_\_\_\_

### SELLER (GRANTOR) INFORMATION

(required)  
 Print Name: DEAD DOG RANCH, LLC.  
 Address: PO BOX 20546  
 City/State/Zip: CARSON CITY, NV 89703

### BUYER (GRANTEE) INFORMATION

(required)  
 Print Name: BEZA ZANDJAN  
 Address: 4775 Costa Verde, Apt. 1416  
 City/State/Zip: San Diego, Ca. 92122

### COMPANY/PERSON REQUESTING RECORDING (required if not the Seller or Buyer)

Company Name: STEWART TITLE OF CARSON CITY Escrow No.: 04023025  
 Address: 111 West Proctor Street  
 City/State/Zip: Carson City, Nevada 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

DOC # DV-344412  
03/03/2005 04:05 PM  
Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Requested By  
STEWART TITLE CARSON

Lyon County - NV  
Mary C. Milligan - Recorder

Page 1 of 2 Fee: \$40.00  
Recorded By: MFK RPTT: \$2,808.00

FOR RECC
Document/In
Book: _____
Date of Recd
Notes: _____

- 1. Assessor Parcel Number(s):  
a) 15-311-18 & 19  
b) \_\_\_\_\_  
c) \_\_\_\_\_  
d) \_\_\_\_\_

- 2. Type of Property:  
a)  Vacant Land                      b) \_\_\_\_\_ Single Family Res.  
c) \_\_\_\_\_ Condo/Townhouse            d) \_\_\_\_\_ 2-4 Plex  
e) \_\_\_\_\_ Apartment Bldg              f) \_\_\_\_\_ Comm'l/Ind'l  
g) \_\_\_\_\_ Agricultural                h) \_\_\_\_\_ Mobile Home  
i) Other: \_\_\_\_\_

3. Total Value/Sales Price of Property: \$ 720,000.00  
 Deed in Lieu of Foreclosure Only (Value of Property) \$ \_\_\_\_\_  
 Transfer Tax Value \$ 720,000.00  
 Real Property Transfer Tax Due: \$ 2808.

- 4. If Exemption Claimed:  
a. Transfer Tax Exemption, per NRS 375.090, Section: \_\_\_\_\_  
b. Explain Reason for Exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: 100

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the disallowance of any claimed exemption or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed

Signature: *Carroll McTutus* Capacity: DOR Manager  
 Signature: \_\_\_\_\_ Capacity: \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION**  
(required)

Print Name: DEAD DOG RANCH, LLC.  
 Address: PO BOX 20546  
 City/State/Zip: CARSON CITY, NV 89703

**BUYER (GRANTEE) INFORMATION**  
(required)

Print Name: REZA ZANDIAN  
 Address: MR. AND MRS. ELIAS ABRISHAMI  
 City/State/Zip: MR. AND MRS. ENAYAT ABRISHAMI

**COMPANY/PERSON REQUESTING RECORDING** (required if not the Seller or Buyer)

Company Name: STEWART TITLE OF CARSON CITY Escrow No.: 04023025  
 Address: 111 West Proctor Street  
 City/State/Zip: Carson City, Nevada 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 13

# Exhibit 13

DOC # 439670

03/18/2014 10:57 AM

Official Record

Recording requested By  
A+ PARALEGALS

Churchill County - NV

Joan Sims - Recorder

Page 1 of 3 Fee: \$16.00

Recorded By: TH RPTT: #5

APN: 007-151-12

Recording Requested by:

Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:

Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France



439670

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, BIJAN AKHAVAN and NOOSHIN AKHAVAN, husband and wife, as Joint Tenants with Right of Survivorship as to an undivided 50% interest and REZA ZANDIAN and NILOOFAR FOUGHANI, husband and wife, as Joint Tenants with Right of Survivorship as to an undivided 50% interest, as TENANTS IN COMMON, to BIJAN AKHAVAN and NOOSHIN AKHAVAN, husband and wife, as Joint Tenants with Right of Survivorship as to an undivided 50% interest and ALBORZ ZANDIAN, an unmarried man, 10% and NILOOFAR FOUGHANI, 30% (on behalf of herself 10%, Nikan Zandian Jazi 10% and Rayan Zandian 10%) (per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003), as joint tenants with right of survivorship, all AS TENANTS IN COMMON.

The real property situate in the County of Churchill, State of Nevada, described as follows:

See Exhibit "A" attached hereto and made a part hereof.

Subject to

Together with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, reverts, issues or profits thereof.

March 12, 2014

Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-



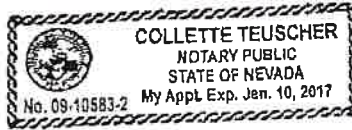
0439670

03/18/2014  
002 of 3

State of Nevada  
County of Washoe

This instrument was acknowledged before me on March 12, 2014 by Reza Zandain.

Collette Teuscher  
Notary Public



-THIS ACKNOWLEDGEMENT IS ATTACHED TO A GRANT DEED  
Dated March 12, 2014

**"UNOFFICIAL COPY"**



DOC # DV-439670

03/18/2014 10:57 AM

Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Recording requested By  
A+ PARALEGALS

Churchill County - NV

Joan Sims - Recorder

Page 1 of 1 Fee: \$16.00  
Recorded By: TH RPTT:

- 1. Assessors Parcel Number(s)
  - a) 007-151-12
  - b) \_\_\_\_\_
  - c) \_\_\_\_\_
  - d) \_\_\_\_\_

- 2. Type of Property:
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Twnh
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agricultural
  - h)  Mobile Home
  - i)  Other

**FOR RECORDERS OPTIONAL USE ONLY**

DOCUMENT/INSTRUMENT #:

BOOK \_\_\_\_\_ PAGE \_\_\_\_\_

DATE OF RECORDING: \_\_\_\_\_

NOTES:

Grantee = Etal TH

- 3. Total Value/Sales Price of Property: \$ 75,000.00
- Deed in Lieu of Foreclosure Only (value of property) ( \_\_\_\_\_ )
- Transfer Tax Value: \$ \_\_\_\_\_
- Real Property Transfer Tax Due: \$ 0

4. If Exemption Claimed:

- a. Transfer Tax Exemption per NRS 375.090 Section # 5
- b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding Wife and Son

- 5. Partial Interest: Percentage being transferred: 40 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantor  
Signature \_\_\_\_\_ Capacity \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION  
(REQUIRED)**

Print Name: Reza Zandian  
Address: 6 rue Edouard Fournier  
City: 75116 Paris, France  
State: \_\_\_\_\_ Zip: \_\_\_\_\_

**BUYER (GRANTEE) INFORMATION  
(REQUIRED)**

Print Name: Alborz Zandian & Niloofar Foughani  
Address: 6 rue Edouard Fournier  
City: 75116 Paris, France  
State: \_\_\_\_\_ Zip: \_\_\_\_\_

**COMPANY/PERSON REQUESTING RECORDING**

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
Address: 312 W. Fourth Street  
City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)





439670

03/18/2014  
003 of 3

EXHIBIT "A"

All that certain lot, piece or parcel of land situate in the County of Churchill, State of Nevada, described as follows:

A portion of the Northeast quarter of the Southeast quarter of the Southwest quarter of Section 15, Township 19 North, Range 27 East, M.D.B.&M., described as follows:

Commencing at the Northeast corner of the Southeast quarter of the Southeast quarter of said Section 15; thence North along the East line of said Section 15 a distance of 716 feet to a point on the Southerly right-of-way line of State Highway No. 50; thence North 58°51' West along the Southerly right-of-way line of said State Highway No. 50 a distance of 503 feet to the true point of beginning; thence continuing along said right-of-way line North 58°51' West a distance of 437 feet to a point of intersection with Southeasterly line of "T" Line Canal; thence along the Southeasterly and Easterly line of said "T" Line Canal the following courses and distances: South 67°18' West 310 feet; thence on a curve to the left having a radius of 287.94 feet through a central angle of 89°52' for an arc distance of 331 feet;

South 22°34' East 172 feet; thence on a curve to the right having a radius of 573.69 feet through a central angle of 53°24' for an arc distance of 774.69 feet; and South 30°50' West a distance of 82.5 feet to a point on the South line of the Northeast quarter of the Southeast quarter of said Section 15; thence along said line East a distance of 774.69 feet to the Southwest corner of parcel conveyed to James W. Cozart, et ux, by deed recorded March 7, 1956 in Book 32 of Deeds, Page 423, Churchill County, Nevada, records, thence North along the West line of said Cozart parcel a distance of 215 feet to the Southeasterly line of parcel conveyed to Andy J. Wilkins, et ux, by deed recorded December 2, 1954 in Book 31 of Deeds, Page 467, Churchill County, Nevada, records; thence along the Southerly line of said Wilkins parcel North 58°51' West 200 feet; thence North along the West line of said Wilkins parcel and the West line of parcel conveyed to Carl H. Johnston, et ux, by deed recorded October 14, 1954 in Book 31 of Deeds, Page 423, Churchill County, Nevada, records, a distance of 653.40 feet to the true point of beginning.

Excepting from the herein above described parcel a parcel conveyed to Florence Caskill Mills by deed recoded July 6, 1956 in Book 32 of Deeds, Page 589, Churchill County, Nevada, records.

Note: The above Metes and Bounds description appeared previously in that certain document recorded July 10, 2006, under Document No. 383845, Official Records.

Exhibit 14

Exhibit 14

DOC # 439671

03/18/2014 10:58 AM

Official Record

Recording requested By  
A+ PARALEGALS

Churchill County - NV

Joan Sims - Recorder

Page 1 of 2 Fee: \$15.00

Recorded By: TH RPTT: #5

APN: 007-151-77

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofer Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN and NILOOFAR FOUGHANI, husband and wife, as Joint Tenants with Right of Survivorship, to ALBORZ ZANDIAN, an unmarried male 20% and NILOOFAR FOUGHANI, NILOOFAR FOUGHANI, 60% (on behalf of herself 20%, Niko Zandian Jazi 20% and Rayan Zandian 20%) (per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003), as joint tenants with right of survivorship.

The real property situate in the County of Churchill, State of Nevada, described as follows:

Parcel 1 of the Greg Jackson Parcel Map recorded February 25, 1983, under Document No. 194366, Official Records, Churchill County, Nevada.

Excepting therefrom that portion of said Parcel transferred to the State of Nevada by Quitclaim Deed recorded April 17, 2012, under Document No. 342891, Official Records, Churchill County, Nevada.

Subject to

Together with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, reversionary issues or profits thereof.

March 12, 2014

  
Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-



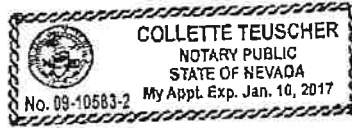
439671

03/18/2014  
002 of 2

State of Nevada  
County of Washoe

This instrument was acknowledged before me on March 12, 2014 by Reza Zandain.

Collette Teuscher  
Notary Public



-THIS ACKNOWLEDGEMENT IS ATTACHED TO A GRANT DEED  
Dated March 12, 2014

**"UNOFFICIAL COPY"**

DOC # DV-439671

03/18/2014 10:58 AM

Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Recording requested By  
A+ PARALEGALS

Churchill County - NV

Joan Sims - Recorder

Page 1 of 1 Fee: \$15.00  
Recorded By: TH RPTT:

- 1. Assessors Parcel Number(s)
  - a) 007-151-77
  - b) \_\_\_\_\_
  - c) \_\_\_\_\_
  - d) \_\_\_\_\_

- 2. Type of Property
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Twnh
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agricultural
  - h)  Mobile Home
  - i)  Other \_\_\_\_\_

**FOR RECORDERS OPTIONAL USE ONLY**

DOCUMENT/INSTRUMENT #: \_\_\_\_\_

BOOK \_\_\_\_\_ PAGE \_\_\_\_\_

DATE OF RECORDING: \_\_\_\_\_

NOTES: Grantor = Etal TH

3. Total Value/Sales Price of Property: \$ 20,160.00

Deed in Lieu of Foreclosure (Only value of property) ( \_\_\_\_\_ )

Transfer Tax Value: \$ \_\_\_\_\_

Real Property Transfer Tax Due: \$ 0

- 4. If Exemption Claimed:
  - a. Transfer Tax Exemption per NRS 375.090 Section # 5
  - b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of legal consanguinity or affinity: adding Wife and Son

5. Partial Interest: Percentage being transferred: 80 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantor

Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Reza Zandian

Address: 6 rue Edouard Fournier

City: 75116 Paris, France

State: \_\_\_\_\_ Zip: \_\_\_\_\_

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Alborz Zandian & Niloofar Foughani

Address: 6 rue Edouard Fournier

City: 75116 Paris, France

State: \_\_\_\_\_ Zip: \_\_\_\_\_

COMPANY/PERSON REQUESTING RECORDING

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_

Address: 312 W. Fourth Street

City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 15

Exhibit 15



DOC # 439672

03/18/2014 10:59 AM

Official Record

Recording requested By  
A+ PARALEGALS

Churchill County - NV  
Joan Sims - Recorder

Page 1 of 2 Fee: \$15.00  
Recorded By: TH RPTT: #5

APN: 009-33-104

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofer Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN and NILOOFAR FOUGHANI, husband and wife, as Joint Tenants with Right of Survivorship, to ALBORZ ZANDIAN, an unmarried man, 20% and NILOOFAR FOUGHANI, 60% (on behalf of herself 20%, Nikan Zandian Jazi 20% and Payan Zandian 20%) (per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003), as joint tenants with right of survivorship.

The real property situate in the County of Churchill, State of Nevada, described as follows:

Township 20 North, Range 27 East, 3rd Meridian, Section 29; The NW ¼ of the NW ¼; and the NW ¼ of the SW ¼ of the NW ¼.

Excepting therefrom, 75% of heat, fluid and mining rights as reserved by a prior grantor.

Further excepting and reserving unto Southern Pacific Land Company, its successors and assigns, all petroleum, oil, natural gas, and products derived therefrom, within or underlying said land or that may be produced therefrom, and all rights thereto, together with the exclusive right at all times to enter upon or in said land to prospect for and to drill, bore, recover, and remove the same.

Subject to

Together with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

March 12, 2014

Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-





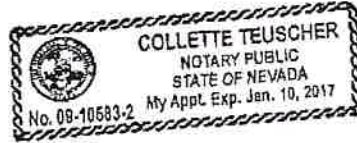
439672

03/18/2014  
002 of 2

State of Nevada  
County of Washoe

This instrument was acknowledged before me on March 12, 2014 by Reza Zandain.

Collette Teuscher  
Notary Public



-THE ACKNOWLEDGEMENT IS ATTACHED TO A GRANT DEED  
Dated March 12, 2014

**"UNOFFICIAL COPY"**

DOC # DV-439672

03/18/2014 10:59 AM

Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Recording requested By  
A+ PARALEGALS

Churchill County - NV

Joan Sims - Recorder

Page 1 of 1 Fee: \$15.00

Recorded By: TH RPTT:

- 1. Assessors Parcel Number(s)
  - a) 009-33-104
  - b) \_\_\_\_\_
  - c) \_\_\_\_\_
  - d) \_\_\_\_\_

- 2. Type of Property:
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Twnh
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agricultural
  - h)  Mobile Home
  - i)  Other \_\_\_\_\_

**FOR RECORDERS OPTIONAL USE ONLY**

DOCUMENT/INSTRUMENT #: \_\_\_\_\_

BOOK \_\_\_\_\_ PAGE \_\_\_\_\_

DATE OF RECORDING: \_\_\_\_\_

NOTES: \_\_\_\_\_

Grantee = Ctal TH

- 3. Total Value/Sales Price of Property: \$ 7,500.00
- Deed in Lieu of Foreclosure Only (value of property) ( \_\_\_\_\_ )
- Transfer Tax Value: \$ \_\_\_\_\_
- Real Property Transfer Tax Due: \$ 0

- 4. If Exemption Claimed:
  - a. Transfer Tax Exemption per NRS 375.095 Section # 5
  - b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding Son and Wife
- 5. Partial Interest: Percentage being transferred: 80 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature Grantor Capacity Grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Reza Zandian  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Alborz Zandian & Niloofar Foughani  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

COMPANY/PERSON REQUESTING RECORDING

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
 Address 312 W. Fourth Street  
 City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 16

# Exhibit 16

The undersigned hereby affirms that this document contains no individual's Federal Social Security number.

A.P.N.: 007-151-12  
File No: 132-2273980 (CAC)  
R.P.T.T.: \$1,435.00  
# 05-27525-06

383845  
OFFICIAL RECORDS  
CHURCHILL COUNTY NEVADA  
RECORDED BY  
WESTERN NEVADA TITLE CO.  
2006 JUL 10 PM 2:05

TRENA FURETTO  
COUNTY RECORDER  
FEE \$16.00 DEPA

When Recorded Mail To: Mail Tax Statements To:  
Reza Zandian and Niloofar Zandian  
8775 Costa Verde Blvd #1416  
San Diego, CA 92112

UNOFFICIAL COPY

**GRANT, BARGAIN and SALE DEED**

FOR A VALUABLE CONSIDERATION the receipt of which is hereby acknowledged,

Ruth M. Keith, as Successor Co-trustees of the Karl M. Keith Family Trust

do(es) hereby GRANT, BARGAIN and SELL to

Reza Zandian and Niloofar Zandian, husband and wife as joint tenants with right of survivorship

the real property situate in the County of Churchill, State of Nevada, described as follows:

**SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF**

Subject to

TOGETHER with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

Date: 06/27/2006



DESCRIPTION

383845

All that certain lot, piece or parcel of land situate in the County of Churchill, State of Nevada, described as follows:

A portion of the Northeast quarter of the Southeast quarter of Section 15, Township 19 North, Range 27 East, M.D.B. 6201, described as follows:

Commencing at the Northeast corner of the Southeast quarter of the Southeast quarter of said Section 15; thence North along the East line of said Section 15 a distance of 716 feet to a point on the Southerly right-of-way line of State Highway No. 50; thence North  $58^{\circ}51'$  West along the Southerly right-of-way line of said State Highway No. 50 a distance of 503 feet to the true point of beginning; thence continuing along said right-of-way line North  $58^{\circ}51'$  West a distance of 437 feet to a point of intersection with the Southeasterly line of "T" Line Canal; thence along the Southeasterly and Easterly line of said "T" Line Canal the following courses and distances: South  $67^{\circ}18'$  West 310 feet; thence on a curve to the left having a radius of 287.94 feet through a central angle of  $89^{\circ}52'$  for an arc distance of 331 feet; South  $22^{\circ}34'$  East 172 feet; thence on a curve to the right having a radius of 573.69 feet through a central angle of  $53^{\circ}24'$  for an arc distance of 730.00 feet; thence South  $30^{\circ}50'$  West a distance of 82.5 feet to a point on the South line of the Northeast quarter of the Southeast quarter of said Section 15; thence along said line East a distance of 770.69 feet to the Southwest corner of parcel conveyed to James W. Cozart, et ux, by deed recorded March 7, 1956 in Book 32 of Deeds, Page 423, Churchill County, Nevada, records, thence North along the West line of said Cozart parcel a distance of 215 feet to the Southeasterly line of parcel conveyed to Andy J. Wilkins, et ux, by deed recorded December 2, 1954 in Book 31 of Deeds, Page 467, Churchill County, Nevada, records; thence along the Southerly line of said Wilkins parcel North  $58^{\circ}51'$  West 200 feet; thence North along the West line of said Wilkins parcel and the West line of parcel conveyed to Carl H. Johnston, et ux, by deed recorded October 14, 1954 in Book 31 of Deeds, Page 423, Churchill County, Nevada, records, a distance of 653.40 feet to the true point of beginning.

EXCEPTING from the herein above described parcel a parcel conveyed to Florence Caskell Mills by deed recorded July 6, 1956 in Book 32 of Deeds, Page 589, Churchill County, Nevada, records.

Note: The above Metes and Bounds description appeared previously in that certain instrument recorded October 8, 1980 in Book 184, Page 438, under Document No. 176006, Official Records.

END OF DOCUMENT



**STATE OF NEVADA  
DECLARATION OF VALUE**

1. Assessor Parcel Number(s)

- a) 007-151-12
- b) \_\_\_\_\_
- c) \_\_\_\_\_
- d) \_\_\_\_\_

2. Type of Property

- a)  Vacant Land
- b)  Single Fam. Res.
- c)  Condo/Apt/Whse
- d)  2-4 Plex
- e)  Apt. Bldg
- f)  Comm'l/Ind'l
- g)  Agricultural
- h)  Mobile Home
- i)  Other \_\_\_\_\_

383845

<b>FOR RECORDERS OPTIONAL USE</b>	
Book _____	Page: _____
Date of Recording: <b>JUL 10 2006</b>	
Notes: _____	

3. Total Value/Sales Price of Property:

\$350,000.00

Deed in Lieu of Foreclosure (only value of property)

( \$ \_\_\_\_\_ )

Transfer Tax Value:

\$350,000.00

Real Property Transfer Tax Due

\$1,435.00

4. If Exemption Claimed:

- a. Transfer Tax Exemption, per 375.090, Section: \_\_\_\_\_
- b. Explain reason for exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: \_\_\_\_\_ %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature: \_\_\_\_\_

Capacity: Grantee

Signature: \_\_\_\_\_

Capacity: \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION**  
**(REQUIRED)**

**BUYER (GRANTEE) INFORMATION**  
**(REQUIRED)**

Print Name: Karl M. Kelth Family Trust

Print Name: Reza Zandian and

Address: 3201 Plumas St #313

Address: 8775 Costa Verde Blvd,

City: Reno

City: San Diego

State: NV Zip: 89509

State: CA Zip: 92122

**COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)**

First American Title Company of

Print Name: Nevada

File Number: 132-2273980 CAC/CAC

Address: 1987 North Carson, Suite 65

City: Carson City

State: NV Zip: 89701

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)



# Exhibit 17

Exhibit 17

The undersigned hereby affirms that this document contains no individual's Federal Social Security number.

A.P.N.: 007-151-77

File No: 132-2275220 (CAC)

R.P.T.T.: \$295.20

05-27558-05

384273  
OFFICIAL RECORDS  
CHURCHILL COUNTY NEVADA  
RECORDED BY  
WESTERN NEVADA TITLE CO.

2006 JUL 27 PM 2:07

TRACY MARETTO  
COUNTY RECORDER  
FEE 15<sup>00</sup> DEP *[Signature]*

When Recorded Mail To: Mail Tax Statements To:  
Reza Zandian and Niloofar Zandian  
8775 Costa Verde Blvd, 1416  
San Diego, CA 92122

UNOFFICIAL COPY

**GRANT, BARGAIN and SALE DEED**

FOR A VALUABLE CONSIDERATION, the receipt of which is hereby acknowledged,

Kent J. Regll and Dawn Regll, husband and wife as joint tenants

do(es) hereby GRANT, BARGAIN and SELL to

Reza Zandian and Niloofar Zandian, husband and wife as joint tenants with right of survivorship

the real property situate in the County of Churchill, State of Nevada, described as follows:

**Parcel 1 of the Greg Jackson Parcel Map recorded February 25, 1983, under Document No. 194366, Official Records, Churchill County, Nevada.**

**Excepting therefrom that portion of said Parcel 1 transferred to the State of Nevada by Quitclaim Deed recorded April 17, 2002, under Document No. 342891, Official Records, Churchill County, Nevada.**

Subject to

TOGETHER with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

Date: 07/05/2006

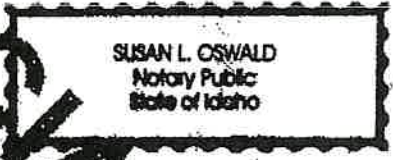
*Kent J. Regli*  
Kent J. Regli  
*Dawn M. Regli*  
Dawn Regli

384273

STATE OF Idaho ss.  
COUNTY OF CARSON

This instrument was acknowledged before me on July 10, 2006 by Kent J. Regli and Dawn Regli.

*Susan L. Oswald*  
Notary Public  
(My commission expires: 4/26/2012)



This Notary Acknowledgement is attached to that certain Grant/Bargain Sale Deed dated **July 05, 2006** under Escrow No. **132-2275220**.

"UNOFFICIAL COPY"

END OF DOCUMENT

STATE OF NEVADA  
DECLARATION OF VALUE

1. Assessor Parcel Number(s)

- a) 007-151-77
- b) \_\_\_\_\_
- c) \_\_\_\_\_
- d) \_\_\_\_\_

384273

2. Type of Property

- a)  Vacant Land
- b)  Single Fam. Res.
- c)  Condominium
- d)  2-4 Plex
- e)  Apt. Bldg.
- f)  Comm'l/Ind'l
- g)  Agricultural
- h)  Mobile Home
- i)  Other \_\_\_\_\_

FOR RECORDERS OPTIONAL USE

Book \_\_\_\_\_ Page: \_\_\_\_\_  
 Date of Recording: JUL 27 2008  
 Notes: \_\_\_\_\_

3. Total Value/Sales Price of Property:

\$71,900.00

Deed In Lieu of Foreclosure (only value of property)

( \$ \_\_\_\_\_ )

Transfer Tax Value:

\$71,900.00

Real Property Transfer Tax Due

\$295.20

4. **If Exemption Claimed:**

a. Transfer Tax Exemption, per 375.090, Section: \_\_\_\_\_

b. Explain reason for exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: \_\_\_\_\_ %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature: [Signature]

Capacity: Grantor

Signature: [Signature]

Capacity: \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION**

**BUYER (GRANTEE) INFORMATION**

(REQUIRED)

(REQUIRED)

Print Name: Kent J. Regil and Dawn Regil

Print Name: Reza Zandian and

Address: 7639S McDermott

Address: 8775 Costa Verde Blvd,

City: Kuna

City: San Diego

State: ID Zip: 83634

State: CA Zip: 92122

**COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)**

First American Title Company of

Print Name: Nevada

File Number: 132-2275220 CAC/CAC

Address: 1987 North Carson, Suite 65

City: Carson City

State: NV Zip: 89701

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 18

Exhibit 18

A.P.N.: 009-33-104  
File No: 131-2206243 (CAC)  
R.P.T.T.: \$82.00  
04-25346-05

372686  
OFFICIAL RECORDS  
CHURCHILL COUNTY NEVADA  
RECORDED BY  
WESTERN NEVADA TITLE CO  
2005 JUL -6 PM 2:30  
TRENA MORETTO  
COUNTY RECORDER  
FEE \$500/DEP \$2

When Recorded Mail To: Mail Tax Statements To:  
Reza Zandian and Niloofar Foughani  
220 Sussex Place  
Carson City, NV 89703

**GRANT, BARGAIN and SALE DEED**

FOR A VALUABLE CONSIDERATION receipt of which is hereby acknowledged,

Mary E. Yost, an unmarried woman and R. E. Yost, Jr., a married man as joint tenants

do(es) hereby GRANT, BARGAIN and SELL to

Reza Zandian and Niloofar Foughani, husband and wife as joint tenants with Right of Survivorship the real property situate in the County of Churchill, State of Nevada, described as follows:

**Township 20 North, Range 27 East, M.D.B. & M., Section 29: The NW 1/4 of the NW 1/4; and the NW 1/4 of the SW 1/4 of the NW 1/4.**

**Excepting therefrom, 75% of heat, fluid and mineral rights as reserved by a prior grantor.**

**Further excepting and reserving unto Southern Pacific Land Company, its successors and assigns, all petroleum, oil, natural gas, and products derived therefrom, whether or not underlying said land or that may be produced therefrom, and all rights thereto, together with the exclusive right at all times to enter upon or in said land to prospect for and to drill, bore, recover, and remove the same.**

Subject to

TOGETHER with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

Date: 06/23/2005

UNOFFICIAL COPY

372686

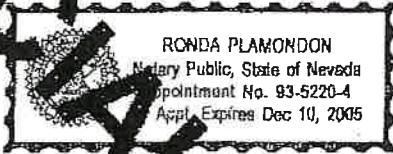
Mary E Yost  
Mary E. Yost

A. E. Yost Jr.  
A. E. Yost Jr.

STATE OF NEVADA )  
                  Church ) SS.  
COUNTY OF CARSON CITY

This instrument was acknowledged before me on 7/1/05 by  
**Mary E. Yost, an unmarried woman and A. E. Yost, Jr., an unmarried man as joint tenants.**

Ronda Plamondon  
Notary Public  
(My commission expires: 12-10-05)



This Notary Acknowledgement is attached to that certain Grant, Bargain Sale Deed dated **June 23, 2005** under Escrow No. **131-2206243**.

"UNOFFICIAL COPY"

END OF DOCUMENT



STATE OF NEVADA  
DECLARATION OF VALUE

1. Assessor Parcel Number(s)

- a) 009-33-104
- b) \_\_\_\_\_
- c) \_\_\_\_\_
- d) \_\_\_\_\_

372686

2. Type of Property

- a)  Vacant Land
- b)  Single Fam. Res.
- c)  Condo/Twnhse
- d)  2-4 Plex
- e)  Apt. Bldg
- f)  Comm'l/Ind'l
- g)  Agriculture
- h)  Mobile Home
- i)  Other \_\_\_\_\_

FOR RECORDERS OPTIONAL USE

Book \_\_\_\_\_ Page: \_\_\_\_\_  
 Date of Recording: \_\_\_\_\_  
 Notes: JUL 06 2005

3. Total Value/Sales Price of Property: \$20,000.00

Deed in Lieu of Foreclosure Option value of property) (\$ \_\_\_\_\_)

Transfer Tax Value: \$20,000.00

Real Property Transfer Tax Due \$82.00

4. If Exemption Claimed:

- a. Transfer Tax Exemption, per 375.090, Section: \_\_\_\_\_
- b. Explain reason for exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: \_\_\_\_\_%

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation called upon to substantiate the information provided herein. Furthermore, the parties agree that rescission of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.090, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature: Mary E. Yost

Capacity: owner

Signature: [Signature]

Capacity: owner

**SELLER (GRANTOR) INFORMATION**

**BUYER (GRANTEE) INFORMATION**

(REQUIRED)

(REQUIRED)

Print Name: Mary E. Yost

Print Name: Reza Zandian and Niloofar Foughani

Address: P.O. Box 1616

Address: 220 Sussex Place

City: Fallon

City: Carson City

State: NV Zip: 89407

State: NV Zip: 89406 89703

**COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)**

First American Title Company of

Print Name: Nevada

File Number: 131-2206243 CAC/CAC

Address: 1213 South Carson Street

City: Carson City

State: NV Zip: 89701

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 19

Exhibit 19

DOC # 684351

03/17/2014 10:50 AM

Official Record

Requested By  
A+ PARALEGALS INC

Elko County - NV

D. Miles Smiles - Recorder

Page 1 of 4 Fee \$17.00

Recorded By: ST RPTT

APN: 001-660-034

Recording Requested by,  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofer Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN and FOUGHANI NILOOFAR ZANDIAN, husband and wife, as Joint Tenants with Right of Survivorship, to ALBORZ ZANDIAN, an unmarried man, 10% and NILOOFAR FOUGHANI, 30% (on behalf of herself 10%, Nikan Zandian Jazi 10% and Rayan Zandian 10%) (per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003), as joint tenants with right of survivorship.

The land referred to herein is situated in the State of Nevada, Elko County, described as follows:

See Exhibit "A" attached hereto and incorporated herein;

TOGETHER WITH any and all buildings and improvements situate thereon.

TOGETHER WITH the tenements, hereditaments and appurtenances thereunto belonging or appertaining, and the reversions, remainder and remainders, rents, issues and profits thereof; it being the intent of the parties that all Grantors' interests, known or unknown, in the above-described property, be conveyed hereby.

SUBJECT, however, to all taxes and other assessments, reservations in patents and all reservations, easements, encumbrances, liens, covenants, rights, rights-of-way and other interests as they may appear of record.

TO HAVE AND TO HOLD, all and singular, the said premises, together with the appurtenances unto the said Grantee, and to the survivor of them, and to the heirs, successors and assigns of the survivor of the Grantee forever.

IN WITNESS WHEREOF, the said Grantors have caused this deed to be executed as of the day and year first hereinbelow written.

March 12, 2014

Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-



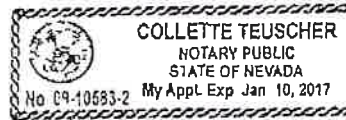
684351

03/17/2014  
002 of 4

State of Nevada  
County of Washoe

This instrument was acknowledged before me on March 12, 2014 by Reza Zandain.

Collette Teuscher  
Notary Public



-THIS ACKNOWLEDGEMENT IS ATTACHED TO A GRANT DEED  
Dated March 12, 2014



684351

09/17/2014  
003 of 4

EXHIBIT "A"

The land referred to herein is situated in the State of Nevada, County of Elko, described as follows:

Parcel 2 as shown on that certain Parcel Map for JAMES W. JENNINGS, etal filed in the office of the County Recorder of Elko County, State of Nevada, on December 31, 1987, as File No. 245403, being a portion of SE1/4 of Section 17, Township 34 North, Range 55 East, M.D.B.&M.

EXCEPTING THEREFROM all those portions of said land lying within the exterior boundaries of Clover Hills Subdivision, Phases 1, 2, and 3, as shown on the official maps thereof, filed in the office of the Elko County Recorder, Elko, Nevada, on October 20, 1988, July 11, 1989 and November 16, 1989, as File No. 264290, 278494 and 284716 respectively.

FURTHER EXCEPTING THEREFROM all that portion of said land conveyed to J. ROSS MACLEAN by Deed recorded September 20, 1991, in Book 762, Page 902, Official Records, Elko County, Nevada.

FURTHER EXCEPTING THEREFROM that portion of said land conveyed to RICHARD G. FLEMING and KERLY L. FLEMING, by Deed recorded on September 15, 1992, in Book 796, Page 134, Official Records, Elko County, Nevada.

EXCEPTING THEREFROM one-half of all oil, gas, mineral and other hydrocarbon substances, reserved by STRATHEARN CATTLE CO., in Deed recorded November 19, 1957, in Book 73, Page 38, Official Records, Elko County, Nevada.

EXCEPTING THEREFROM one-half of all oil, gas, mineral and other hydrocarbon substances, reserved by A.B. MCKINLEY & SONS, INC. in Deed recorded June 14, 1960, in Book 4, Page 272, Official Records, Elko County, Nevada.

At date hereof, exceptions to coverage in addition to the printed exceptions and exclusions in a Policy of Title Insurance are as follows:

1. Rights incidental to the ownership and development of the mineral interests excepted from the land described herein.
2. The fact that the ownership of said land does not include any rights of ingress or egress to or from Interstate 80, as set forth in instrument.  
Recorded : October 25, 1973  
: in Book 186, Page 58, as Document No. 78982  
: Official Records of Elko County, Nevada



684351

03/17/2014  
004 of 4

3. An easement affecting a portion of said land for the purposes stated herein, together with incidental rights thereto,  
Granted to : CP NATIONAL CORPORATION  
: electric power or telephone lines and/or  
: gas or water mains  
Recorded : May 13, 1986  
: in Book 523, Page 457  
: Official Records of Elko County, Nevada
  
4. An easement affecting a portion of said land for the purposes stated herein, together with incidental rights hereto,  
Granted to : AMERICAN TELEPHONE AND TELEGRAPH COMPANY  
Purpose : communication systems and underground cables  
Recorded : August 10, 1988  
: in Book 635, Page 55  
: Official Records of Elko County, Nevada

DOC # DV - 684351  
03/17/2014 10:50 AM  
Official Record

STATE OF NEVADA  
DECLARATION OF VALUE

Requested By  
A+ PARALEGALS INC

Elko County - NV

D Mike Smiles - Recorder

Page 1 of 1 Fee: \$17.00  
Recorded By ST RPTT

- 1. Assessors Parcel Number(s)
  - a) 001-660-034 \_\_\_\_\_
  - b) \_\_\_\_\_
  - c) \_\_\_\_\_
  - d) \_\_\_\_\_

- 2. Type of Property:
  - a)  Vacant Land
  - b)  Single Fam. Res.
  - c)  Condo/Twnhse
  - d)  2-4 Plex
  - e)  Apt. Bldg
  - f)  Comm'l/Ind'l
  - g)  Agricultural
  - h)  Mobile Home
  - i)  Other \_\_\_\_\_

<b>FOR RECORDERS OPTIONAL USE ONLY</b>	
DOCUMENT/INSTRUMENT #:	_____
BOOK _____	PAGE _____
DATE OF RECORDING:	_____
NOTES:	_____

3. Total Value/Sales Price of Property: \$ 70,400.00  
 Deed in Lieu of Foreclosure Only (value of property) ( \_\_\_\_\_ )  
 Transfer Tax Value: \$ \_\_\_\_\_  
 Real Property Transfer Tax Due: \$ 0

- 4. If Exemption Claimed:
  - a. Transfer Tax Exemption per NRS 375.090, Section # 5
  - b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding Wife and Son
- 5. Partial Interest: Percentage being transferred: 40 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030 the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Reza Zandian  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Alborz Zandian & Niloofar Foughani  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

COMPANY/PERSON REQUESTING RECORDING

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
 Address: 312 W. Fourth Street  
 City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)



# Exhibit 20

Exhibit 20

DOC # 560545  
09/25/2006 02:47 PM

**Official Record**

Requested By  
STEWART TITLE

Elko County - NV

Jerry D. Reynolds - Recorder

Page 1 of 4 Fee: \$17.00  
Recorded By: MR RPTT: \$20.10

APN: 001-660-034  
After recording return,  
and mail tax statements, to:

Reza Zandian  
8775 Costa Verde Blvd, #1416  
San Diego, CA 92122



The undersigned hereby affirms this document submitted  
for recording does not contain a social security number.

06212283

**GRANT, BARGAIN AND SALE DEED**

**THIS GRANT, BARGAIN AND SALE DEED**, made this 25<sup>th</sup> day of September, 2006,  
by and between Elko Land and Livestock Company, successor by merger to CG Properties, Inc.,  
Grantor; and Reza Zandian and Foughani Niloofar Zandian, husband and wife, Grantees;

**WITNESSETH:**

That the Grantor, for and in consideration of the sum of TEN DOLLARS (\$10.00),  
lawful, current money of the United States of America, to it in hand paid by the Grantees, the  
receipt whereof is hereby acknowledged, does by these presents grant, bargain, sell, convey and  
confirm unto the said Grantees, as joint tenants with the right of survivorship, all Grantors' right,  
title, estate and interest in and to that certain real property located in Elko County, Nevada, more  
particularly described as follows:

See Exhibit "A" attached hereto and incorporated herein;

TOGETHER WITH any and all buildings and improvements situate thereon.

TOGETHER WITH the tenements, hereditaments and appurtenances thereunto  
belonging or appertaining, and the reversions, remainder and remainders, rents,  
issues and profits thereof; it being the intent of the parties that all Grantors'  
interests, known or unknown, in the above-described property, be conveyed  
hereby.

SUBJECT, however, to all taxes and other assessments, reservations in patents  
and all reservations, easements, encumbrances, liens, covenants, rights, rights-of-  
title and other interests as they may appear of record.

**TO HAVE AND TO HOLD**, all and singular, the said premises, together with the  
appurtenances unto the said Grantees, and to the survivor of them, and to the heirs, successors  
and assigns of the survivor of the Grantees, forever.



560545

09/25/2006  
002 of 4

IN WITNESS WHEREOF, the said Grantor has caused this Deed to be executed as of the day and year first hereinabove written,

ELKO LAND AND LIVESTOCK COMPANY  
Successor by merger to CG PROPERTIES, INC.

By: Leland W. Krugerud  
LELAND W. KRUGERUD

Title: President

STATE OF NEVADA        )  
                                  ) SS  
COUNTY OF ELKO        )

On this 25<sup>th</sup> day of Sept., 2006, personally appeared before me, a Notary Public, Leland W. Krugerud, President of Elko Land and Livestock Company, personally known or proved to me to be the person whose name is subscribed to the above instrument who acknowledged to me that he executed the above instrument on behalf of Elko Land and Livestock Company.

P.J. Glass  
Notary Public

My Commission Expires:

April 11, 2010





560545

09/25/2008  
003 of 4

**SUBJECT PROPERTY DESCRIPTION**

**EXHIBIT "A"**

The land referred to herein is situated in the State of Nevada, County of ELKO, described as follows:

Parcel 2 as shown on that certain Parcel Map for JAMES W. JENNINGS, etal filed in the office of the County Recorder of Elko County, State of Nevada, on December 31, 1987, as File No. 245403, being a portion of SE1/4 of Section 17, Township 34 North, Range 55 East, M.D.B. &M.

EXCEPTING THEREFROM all those portions of said land lying within the exterior boundaries of Clover Hills Subdivision, Phases 1, 2 and 3, as shown on the official maps thereof, filed in the office of the Elko County Recorder, Elko, Nevada, on October 20, 1988, July 11, 1989, and November 16, 1989, as File No. 264290, 278494 and 284716 respectively.

FURTHER EXCEPTING THEREFROM all that portion of said land conveyed to J. ROSS MACLEAN by Deed recorded September 20, 1991, in Book 762, Page 902, Official Records, Elko County, Nevada.

FURTHER EXCEPTING THEREFROM that portion of said land conveyed to RICHARD G. FLEMING and KERLY L. FLEMING, by Deed recorded September 15, 1992, in Book 796, Page 134, Official Records, Elko County, Nevada.

EXCEPTING THEREFROM one-half of all oil, gas, mineral and other hydrocarbon substances, reserved by STRATHEARN CATTLE CO., in Deed recorded November 19, 1957, in Book 73, Page 38, Deed Records, Elko County, Nevada.

FURTHER EXCEPTING THEREFROM one-half of all oil, gas, mineral and other hydrocarbon substances reserved by A.B. MCKINLEY & SONS, INC. in Deed Recorded June 14, 1960, in Book 4, Page 272, Official Records, Elko County, Nevada.

CS



560545

09/25/2008  
004 of 4

At the date hereof, exceptions to coverage in addition to the printed exceptions and exclusions in a Policy of Title Insurance are as follows:

1. Taxes for the fiscal year July 1, 2006 to June 30, 2007, including any secured personal property taxes and any special or district assessments collected therewith, and any other assessments levied by City or County authorities, a lien now due and payable,  
Total amount : \$603.01  
1<sup>st</sup> installment : \$150.76 Delinquent plus penalties  
2<sup>nd</sup> installment : \$150.75 due October 2, 2006  
3<sup>rd</sup> installment : \$150.75 due January 1, 2007  
4<sup>th</sup> installment : \$150.75 due March 5, 2007  
Assessor Parcel No. : 001-660-034
2. The lien, if any, of supplemental taxes, assessed pursuant to provisions adopted by the Nevada Legislature, and as disclosed by the Nevada Revised Statutes.
3. Rights incidental to the ownership and development of the mineral interests excepted from the land described herein.
4. The fact that the ownership of said land does not include any rights of ingress or egress to or from Interstate 80, as set forth in instrument.  
Recorded : October 25, 1973  
: in Book 186, page 58, as Document No. 78982  
: Official Records of Elko County, Nevada
5. An easement affecting a portion of said land for the purposes stated herein, together with incidental rights thereto,  
Granted to : CP NATIONAL CORPORATION  
: electric power or telephone lines and/or  
: gas or water mains  
Recorded : May 13, 1986  
: in book 523, Page 457,  
: Official Records of Elko County, Nevada.
6. An easement affecting a portion of said land for the purposes stated herein, together with incidental rights hereto,  
Granted to : AMERICAN TELEPHONE AND TELEGRAPH COMPANY  
Purpose : communication systems and underground cables  
Recorded : August 10, 1988  
: in Book 635, Page 55,  
: Official Records of Elko County, Nevada

DOC # DV -

560545

09/25/2006

02:47 PM

Official Record

Requested By  
STEWART TITLE

STATE OF NEVADA  
DECLARATION OF VALUE

Elko County - NV

FOR RE:  
Document

Jerry D. Reynolds - Recorder

Book: \_\_\_\_\_

Page 1 of 1 Fee: \$17.00  
Recorded By: NR RPTT: \$230.10

Date of Re: \_\_\_\_\_

Notes: \_\_\_\_\_

1. Assessor Parcel Number(s):

- a) 001-660-034
- b) \_\_\_\_\_
- c) \_\_\_\_\_
- d) \_\_\_\_\_

2. Type of Property:

- a)  Vacant Land
- b) \_\_\_\_\_ Single Family Res.
- c) \_\_\_\_\_ Condo/Townhouse
- d) \_\_\_\_\_ 2-4 Plex
- e) \_\_\_\_\_ Apartment Bldg.
- f) \_\_\_\_\_ Comm'l/Ind'l
- g) \_\_\_\_\_ Agricultural
- h) \_\_\_\_\_ Mobile Home
- i) Other: \_\_\_\_\_

3. Total Value/Sales Price of Property

\$ 59,000.00

Deed in Lieu of Foreclosure Only (Value of Property)

\$ \_\_\_\_\_

Transfer Tax Value

\$ 59,000.00

Real Property Transfer Tax Due:

\$ 230.10

4. If Exemption Claimed:

- a. Transfer Tax Exemption, per NRS 375.090, Section: \_\_\_\_\_
- b. Explain Reason for Exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: 100 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the disallowance of any claimed exemption or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed

Signature: \_\_\_\_\_ Capacity: \_\_\_\_\_

Signature: \_\_\_\_\_ Capacity: \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(required)

Print Name: Elko Land and Livestock  
Address: 555 5th Street  
City/State/Zip: Elko, NV 89801

BUYER (GRANTEE) INFORMATION  
(required)

Print Name: Reza Zandian  
Address: 8775 Costa Verde Blvd #1416  
City/State/Zip: San Diego, CA 92122

COMPANY/PERSON REQUESTING RECORDING (required if not the Seller or Buyer)

Company Name: STEWART TITLE OF NORTHEASTERN NEVADA Escrow No.: 06212283  
Address: 810 Idaho Street  
City/State/Zip: Elko, Nevada 89801

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 21

# Exhibit 21



3-1

APN: 071-02-000-005

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France

Inst #: 20140530-0001037  
Fees: \$18.00 N/C Fee: \$0.00  
RPTT: \$0.00 Ex: #005  
05/30/2014 09:50:42 AM  
Receipt #: 2040576  
Requestor:  
NILOOFAR FOUGHANI  
Recorded By: SCA Pgs: 3  
DEBBIE CONWAY  
CLARK COUNTY RECORDER

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN a married man, to my son ALBORZ ZANDIAN, an unmarried man, 20% and my wife NILOOFAR FOUGHANI ZANDIAN, 60% as joint tenants with right of survivorship (per financial agreement entered into in Las Vegas, Nevada and dated August 21, 2003).

All that real property situated in the County of Clark, State of Nevada, described as follows:

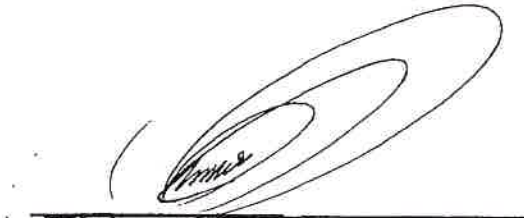
The Southeast Quarter (SE1/4) of the Northeast Quarter (NE1/4) of the Northeast Quarter (NE1/4) of section 2, Township 16 South, Range 68 East, M.D.M.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging to or in anywise appertaining.

SUBJECT TO:

1. General and special taxes for the current fiscal year.
2. Covenants, conditions, restrictions, rights of way, easements and reservations of record.

May 20, 2014



Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED

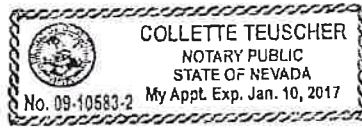
State of Nevada  
Carson City

On May 20, 2014 before me, a notary public personally appeared Reza Zandian who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Collette Teuscher  
Notary Public



THIS ACKNOWLEDGMENT IS ATTACHED TO A GRANT DEED  
Dated May 20, 2014

STATE OF NEVADA  
DECLARATION OF VALUE

1. Assessors Parcel Number(s)  
 a) 071-02-000-005  
 b) \_\_\_\_\_  
 c) \_\_\_\_\_  
 d) \_\_\_\_\_

2. Type of Property:  
 a)  Vacant Land    b)  Single Fam. Res.  
 c)  Condo/Twnhse    d)  2-4 Plex  
 e)  Apt. Bldg    f)  Comm'l/Ind'l  
 g)  Agricultural    h)  Mobile Home  
 i)  Other \_\_\_\_\_

<b>FOR RECORDERS OPTIONAL USE ONLY</b>	
DOCUMENT/INSTRUMENT #:	_____
BOOK _____	PAGE _____
DATE OF RECORDING: _____	
NOTES: _____	

3. Total Value/Sales Price of Property: \$ \_\_\_\_\_  
 Deed in Lieu of Foreclosure Only (value of property) ( \_\_\_\_\_  
 Transfer Tax Value: \$ \_\_\_\_\_  
 Real Property Transfer Tax Due: \$ \_\_\_\_\_ 0 \_\_\_\_\_

4. If Exemption Claimed:  
 a. Transfer Tax Exemption per NRS 375.090, Section # 5  
 b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding wife & son  
 5. Partial Interest: Percentage being transferred: 80 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature \_\_\_\_\_ Capacity Grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION  
(REQUIRED)**

Print Name: Reza Zandian  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

**BUYER (GRANTEE) INFORMATION  
(REQUIRED)**

Print Name: Alborz Zandian & Niloofar Foughani  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

**COMPANY/PERSON REQUESTING RECORDING  
(required if not the seller or buyer)**

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
 Address: 312 W. Fourth Street  
 City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)

# Exhibit 22

# Exhibit 22

3-1

APN: 071-02-000-013

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France

Inst #: 20140530-0001038  
Fees: \$18.00 N/C Fee: \$0.00  
RPTT: \$0.00 Ex: #005  
05/30/2014 09:50:42 AM  
Receipt #: 2040576  
Requestor:  
NILOOFAR FOUGHANI  
Recorded By: SCA Pgs: 3  
DEBBIE CONWAY  
CLARK COUNTY RECORDER

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

I, Reza Zandian, hereby grant said property from, REZA ZANDIAN a married man, to my son ALBORZ ZANDIAN, an unmarried man, 20% and my wife NILOOFAR FOUGHANI ZANDIAN, 60% as joint tenants with right of survivorship (per financial agreement entered into in Las Vegas, Nevada and dated August 21, 2003).

All that real property situated in the County of Clark, State of Nevada, described as follows:

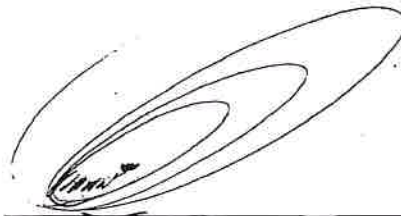
The South Half (S1/2) of the Southeast Quarter (SE1/4) of the Northeast Quarter (NE1/4) of section 2, Township 16 South, Range 68 East, M.D.M.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging to or in anywise appertaining.

SUBJECT TO:

1. General and special taxes for the current fiscal year.
2. Covenants, conditions, restrictions, rights of way, easements and reservations of record.

May 20, 2014



Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED

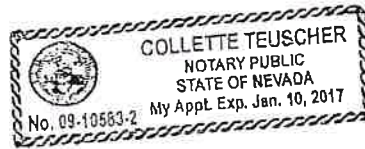
State of Nevada  
Carson City

On May 20, 2014 before me, a notary public personally appeared Reza Zandian who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of Nevada that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Collette Teuscher  
Notary Public



THIS ACKNOWLEDGMENT IS ATTACHED TO A GRANT DEED  
Dated May 20, 2014

STATE OF NEVADA  
DECLARATION OF VALUE

1. Assessors Parcel Number(s)  
 a) 071-02-000-013  
 b) \_\_\_\_\_  
 c) \_\_\_\_\_  
 d) \_\_\_\_\_

2. Type of Property:  
 a)  Vacant Land    b)  Single Fam. Res.  
 c)  Condo/Twnhse    d)  2-4 Plex  
 e)  Apt. Bldg    f)  Comm'l/Ind'l  
 g)  Agricultural    h)  Mobile Home  
 i)  Other \_\_\_\_\_

<b>FOR RECORDERS OPTIONAL USE ONLY</b>	
DOCUMENT/INSTRUMENT #:	_____
BOOK _____	PAGE _____
DATE OF RECORDING:	_____
NOTES:	_____

3. Total Value/Sales Price of Property: \$ \_\_\_\_\_  
 Deed in Lieu of Foreclosure Only (value of property) ( \_\_\_\_\_  
 Transfer Tax Value: \$ \_\_\_\_\_  
 Real Property Transfer Tax Due: \$ \_\_\_\_\_ 0 \_\_\_\_\_

4. If Exemption Claimed:  
 a. Transfer Tax Exemption per NRS 375.090, Section # 5  
 b. Explain Reason for Exemption: A transfer of real property if the owner is related to the person to whom it is conveyed within the first degree of lineal consanguinity or affinity: adding wife & son  
 5. Partial Interest: Percentage being transferred: 80 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month.

**Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.**

Signature \_\_\_\_\_ Capacity Grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION  
(REQUIRED)**

Print Name: Reza Zandian  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

**BUYER (GRANTEE) INFORMATION  
(REQUIRED)**

Print Name: Alborz Zandian & Niloofer Foughani  
 Address: 6 rue Edouard Fournier  
 City: 75116 Paris, France  
 State: \_\_\_\_\_ Zip: \_\_\_\_\_

**COMPANY/PERSON REQUESTING RECORDING**

(required if not the seller or buyer)

Print Name: A+ Paralegals, Inc. Escrow # \_\_\_\_\_  
 Address: 312 W. Fourth Street  
 City: Carson City State: NV Zip: 89703

(AS A PUBLIC RECORD THIS FORM MAY BE RECORDED/MICROFILMED)



# Exhibit 23

# Exhibit 23

52

20050419-0004639

Fee: \$16.00 RPTT: \$122.40  
N/C Fee: \$25.00

04/19/2005 15:31:57  
T20050070845

Requestor:  
EQUITY TITLE OF NEVADA

Frances Deane PUN  
Clark County Recorder Pgs: 3

**RECORDING REQUESTED BY:  
EQUITY TITLE OF NEVADA  
AND WHEN RECORDED MAIL TO:**

Reza Zandian  
8775 Costa Verde Ste 1416  
San Diego, CA 92122

**AND WHEN RECORDED MAIL**

**TAX STATEMENTS TO:  
SAME AS ABOVE**

APN NO. 071-02-000-005

Affix RPTT: \$122.40

ESCROW NO.: 05480076

(CB)

**GRANT, BARGAIN, SALE DEED**

THIS INDENTURE WITNESSETH THAT:

George W. Wilkinson, an unmarried man

in consideration of the sum of Ten Dollars (\$10.00), the receipt of which is hereby acknowledged, do hereby Grant, Bargain Sell and convey to

Reza Zandian, a married man

all that real property situated in the County of Clark, State of Nevada, described as follows:

The Southeast Quarter (SE ¼) of the Northeast Quarter (NE ¼) of the Northeast Quarter (NE ¼) of Section 2, Township 16 South, Range 68 East, M.D.M.

TOGETHER WITH all and singular the tenements, hereditaments and appurtenances thereunto belonging to in anywise appertaining.

**SUBJECT TO:**

1. General and special taxes for the current fiscal year.
2. Covenants, conditions, restrictions, rights of way, easements and reservations of record.

**SELLER:**

George W. Wilkinson Sr.  
George W. Wilkinson SR.

STATE OF NEVADA Montana  
COUNTY OF CLARK Ravalli

} SS:

On April 12, 2005

Personally appeared before me, a Notary Public

George W. Wilkinson

who acknowledged that he/she/they executed the above instrument.



NOTARY PUBLIC-MONTANA

Residing at Hamilton, Montana

My Comm. Expires July 22, 2006

Judy Owings  
Notary Public

My commission expires: July 22, 2006

32.

STATE OF NEVADA  
DECLARATION OF VALUE FORM

1. Assessor Parcel Number(s)

a) 071-02-000-005

b)

c)

d)

2. Type of Property:

a)  Vacant Land

b)  Single Fam. Res.

c)  Condo/Twnhse

d)  2-4 Plex

e)  Apt. Bldg

f)  Comm'l/Ind'l

g)  Agricultural

h)  Mobile Home

Other \_\_\_\_\_

FOR RECORDER'S OPTIONAL USE ONLY	
Book: _____	Page: _____
Date of Recording: _____	
Notes: _____	

3. Total Value/Sales Price of Property

\$24,000.00

Deed in Lieu of Foreclosure Only (value of property)

(\_\_\_\_\_)

Transfer Tax Value:

\$24,000.00

Real Property Transfer Tax Due

~~\$24,000.00~~ \$122.40

4. If Exemption Claimed:

a. Transfer Tax Exemption per NRS 375.090, Section \_\_\_\_\_

b. Explain Reason for Exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: 100 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature George W. Wilkinson Sr.

Capacity owner

Signature \_\_\_\_\_

Capacity \_\_\_\_\_

**SELLER (GRANTOR) INFORMATION  
(REQUIRED)**

Print Name: George W. Wilkinson Sr.

Address: 535 Ashtan Dr.

City: Carroll

State: MT Zip: 59828

**BUYER (GRANTEE) INFORMATION  
(REQUIRED)**

Print Name: Reza Zardian

Address: 8775 Costa Verde

City: Sandiego

State: CA Zip: 92122

**COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)**

Print Name: Equity Title Of Nevada

Escrow #: 05480076

Address: 742 W. Pioneer Blvd. Suite D.

City: LV

State: NV Zip: 89147

AN ADDITIONAL RECORDING FEE OF \$1.00 WILL APPLY FOR EACH DECLARATION OF VALUE FORM PRESENTED TO CLARK COUNTY, EFFECTIVE JUNE 1, 2004.

*Handwritten initials: U639*

Exhibit 24

Exhibit 24

30

20050420-0000563

Fee: \$16.00 RPTT: \$204.00  
N/C Fee: \$0.00

04/20/2005 09:03:41  
T20050071150

Requestor:  
EQUITY TITLE OF NEVADA

Frances Deane KGP  
Clark County Recorder Pgs: 3

**RECORDING REQUESTED BY:  
EQUITY TITLE OF NEVADA  
AND WHEN RECORDED MAIL TO:**

Reza Zandian  
8775 Costa Verde Ste 1416  
San Diego, CA 92122

**AND WHEN RECORDED MAIL**

**TAX STATEMENTS TO:**

SAME AS ABOVE

3

APN NO. 071-02-000-013

Affix RPTT: \$204.00

ESCROW NO.: 05480075

**GRANT, BARGAIN, SALE DEED**

**THIS INDENTURE WITNESSETH THAT:**

Lois R. Adams, surviving joint tenant

in consideration of the sum of Ten Dollars (\$10.00), the receipt of which is hereby acknowledged, do hereby Grant, Bargain Sell and convey to

Reza Zandian, a *married man*

all that real property situated in the County of Clark, State of Nevada, described as follows:

The South Half (S ½) of the Southeast Quarter (SE ¼) of the Northeast Quarter (NE ¼) of Section 2, Township 16 South, Range 68 East, M.D.M.

TOGETHER WITH all and singular the tenements, hereditaments and appurtenances thereunto belonging to in anywise appertaining.

SUBJECT TO:

1. General and special taxes for the current fiscal year.
2. Covenants, conditions, restrictions, rights of way, easements and reservations of record.

SELLERS:

Lois R Adams  
Lois R. Adams

*ARIZONA*  
STATE OF NEVADA  
COUNTY OF CLARK *MARICOPA*  
On MARCH 12 2005

} SS:

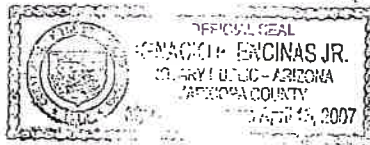
Personally appeared before me, a Notary Public  
LOIS R ADAMS

who acknowledged that he/she/they executed the above instrument.

Ignacio F Encinas Jr  
Notary Public Ignacio F. Encinas, Jr.

Ignacio F. Encina Jr.  
exp Apr 15, 2007

My commission expires: 4-15-2007





STATE OF NEVADA  
DECLARATION OF VALUE FORM

1. Assessor Parcel Number(s)

- a) 071-02-000-013
- b)
- c)
- d)

2. Type of Property:

- a)  Vacant Land
- b)  Single Fam. Res.
- c)  Condo/Twnhse
- d)  2-4 Plex
- e)  Apt. Bldg
- f)  Comm' / Ind'l
- g)  Agricultural
- h)  Mobile Home
- Other \_\_\_\_\_

FOR RECORDER'S OPTIONAL USE ONLY	
Book: _____	Page: _____
Date of Recording: _____	
Notes: _____	

3. Total Value/Sales Price of Property \$40,000.00  
 Deed in Lieu of Foreclosure Only (value of property) \_\_\_\_\_  
 Transfer Tax Value: \$40,000.00  
 Real Property Transfer Tax Due \$204.00

4. If Exemption Claimed:

- a. Transfer Tax Exemption per NRS 375.090, Section \_\_\_\_\_
- b. Explain Reason for Exemption: \_\_\_\_\_

5. Partial Interest: Percentage being transferred: 100 %

The undersigned declares and acknowledges, under penalty of perjury, pursuant to NRS 375.060 and NRS 375.110, that the information provided is correct to the best of their information and belief, and can be supported by documentation if called upon to substantiate the information provided herein. Furthermore, the parties agree that disallowance of any claimed exemption, or other determination of additional tax due, may result in a penalty of 10% of the tax due plus interest at 1% per month. Pursuant to NRS 375.030, the Buyer and Seller shall be jointly and severally liable for any additional amount owed.

Signature [Signature] Capacity grantor  
 Signature \_\_\_\_\_ Capacity \_\_\_\_\_

SELLER (GRANTOR) INFORMATION  
(REQUIRED)

Print Name: Lois R Adams  
 Address: 22102 W Hilton Ave  
 City: Burke  
 State: AZ Zip: 85326

BUYER (GRANTEE) INFORMATION  
(REQUIRED)

Print Name: Reza Zardan  
 Address: 8775 Costa Verde #1410  
 City: San Diego  
 State: CA Zip: 92122

COMPANY/PERSON REQUESTING RECORDING (required if not seller or buyer)

Print Name: Equity Title Of Nevada Escrow #: 05480075  
 Address: 742 W. Pioneer Blvd, Suite D.  
 City: Mesquite State: NV Zip: 89027

AN ADDITIONAL RECORDING FEE OF \$1.00 WILL APPLY FOR EACH DECLARATION OF VALUE FORM PRESENTED TO CLARK COUNTY, EFFECTIVE JUNE 1, 2004.

563

# Exhibit 25

# Exhibit 25

**DOC # 4335754**

03/18/2014 04:28:04 PM

Requested By

A+ PARALEGALS INC

Washoe County Recorder

Lawrence R. Burtness - Recorder

Fee: \$18.00 RPTT: \$0.00

Page 1 of 2

APN: 079-150-12

Recording Requested by:  
Grantor, Reza Zandian

When Recorded Mail Document and tax statements to:  
Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France



SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

**GRANT DEED**

I, Reza Zandian (also known as Resa Zandian), hereby grants his 50% of said property from, RESA ZANDIAN and NILOOFAR FOUGHANI, husband and wife as joint tenants with right of survivorship, to NILOOFAR FOUGHANI 30% (on behalf of herself 10%, Nikan Zandian Jazi 10% and Rayan Zandian 10%) (per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003) and ALBORZ ZANDIAN, 10% an unmarried man, as joint tenants with right of survivorship.

The land referred to herein is situated in the State of Nevada, Washoe County, described as follows:

**The Southwest Quarter (SW ¼) of Section 25, Township 21 North, Range 23 East, M.D.M.**

Together with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

March 12, 2014

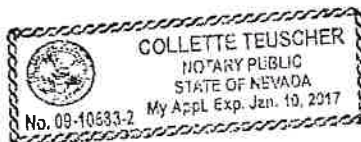
  
\_\_\_\_\_  
Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-

State of Nevada  
County of Washoe

This instrument was acknowledged before me on March 12, 2014 by Reza Zandain.

Collette Teuscher  
Notary Public



-THIS ACKNOWLEDGEMENT IS ATTACHED TO A GRANT DEED  
Dated March 12, 2014

COPY

Exhibit 26

Exhibit 26

A.P.N.: 079-150-12  
File No: 121-2208137 (JB)  
R.P.T.T.: \$369.00



When Recorded Mail To: Mail Tax Statements To:  
Resa Zandian and Niloofar Foughani  
8775 Costa Verde #1416  
San Diego, CA 92122

**GRANT, BARGAIN and SALE DEED**

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

John Clifton, an unmarried man

do(es) hereby GRANT, BARGAIN and SELL to

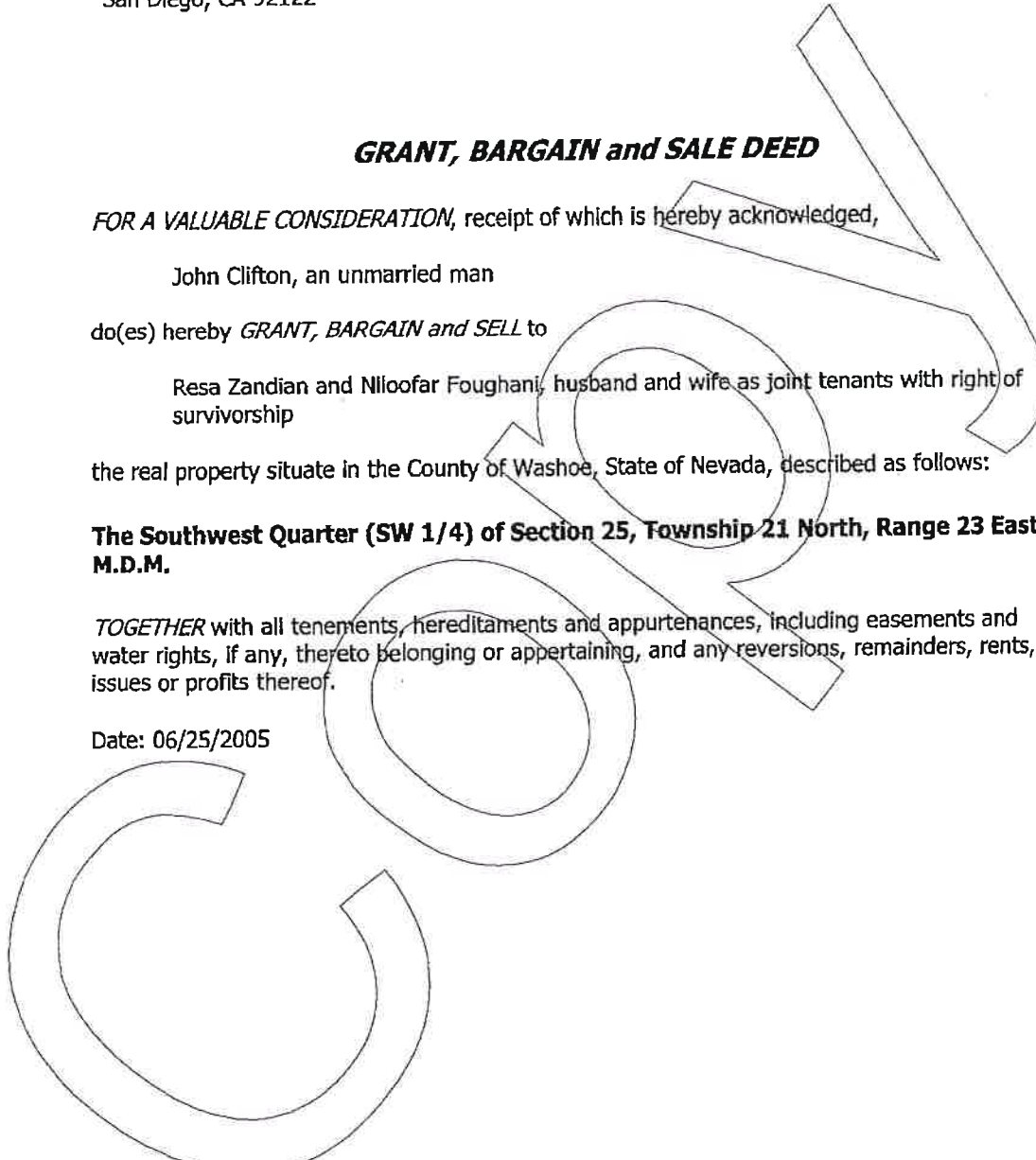
Resa Zandian and Niloofar Foughani, husband and wife as joint tenants with right of survivorship

the real property situate in the County of Washoe, State of Nevada, described as follows:

**The Southwest Quarter (SW 1/4) of Section 25, Township 21 North, Range 23 East, M.D.M.**

TOGETHER with all tenements, hereditaments and appurtenances, including easements and water rights, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

Date: 06/25/2005



John Clifton  
John Clifton

STATE OF <sup>CALIFORNIA</sup> ~~NEVADA~~ )  
: ss.  
COUNTY OF ORANGE

This instrument was acknowledged before me on  
JUNE 3, 2005 by  
John Clifton.

Clifford C. Chard  
Notary Public  
(My commission expires: 2/7/08 )



This Notary Acknowledgement is attached to that certain Grant, Bargain Sale Deed dated  
06/02/2005 under Escrow No. 121-2208137

COPY

3236343  
86/27/2885  
2 of 2



# Exhibit 27

# Exhibit 27

APN: 079-150-09, 079-150-10, 07-150-13  
084-040-02, 084-040-04, 084-040-06,  
084-040-10, 084-130-07, 084-140-17

DOC # 2900592  
08/08/2003 03:48P Fee:20.00  
BK1  
Requested By  
WESTERN TITLE COMPANY INC  
Washoe County Recorder  
Kathryn L. Burke - Recorder  
Pg 1 of 7 RPTT 1500.00

RPTT \$1,500.00 130277-TX

RECORDING REQUESTED BY AND  
WHEN RECORDED RETURN TO:

Star Living Trust  
950 Seven Hills Drive, Ste 1026  
Henderson, NV 89052

2827 S. MONTA CRISTO  
LAS VEGAS, NV 89117

Mail Tax Statement to Above

25269-0012

00130277 GRANT, BARGAIN AND SALE DEED



THIS GRANT, BARGAIN AND SALE DEED is made this 1st day of AUGUST, 2003 by and between NEVADA LAND AND RESOURCE COMPANY, LLC, a Delaware limited liability company, whose address is 704 W. Nye Lane, Suite 201, Carson City, Nevada, 89703 (referred to as "GRANTOR") and FRED SADRI TRUSTEE OF THE STAR LIVING TRUST, DATED APRIL 14, 1997, AS TO AN UNDIVIDED 1/3 INTEREST, RAY KOROGHLI, AN UNMARRIED MAN, AS TO AN UNDIVIDED 1/3 INTEREST AND REZA ZANDIAN, A MARRIED MAN AS HIS SOLE AND SEPARATE PROPERTY, AS TO AN UNDIVIDED 1/3 INTEREST, AS TENANTS IN COMMON, (referred to as "GRANTEE").

GRANTOR, in consideration of the sum of Ten Dollars (\$10.00), lawful money of the United States, and other good and valuable consideration to GRANTOR paid by the GRANTEE, the receipt of which GRANTOR acknowledges, by these presents grants, bargains and sells to GRANTEE, and to GRANTEE's successors and assigns forever, all right, title and interest in and to that certain real property situated in Washoe County, State of Nevada, and more particularly described on Exhibit A, except the easement and mineral estate and interest reserved to GRANTOR.

Together with all and singular the tenements, hereditaments and appurtenances belonging, or in anywise appertaining, to the real property, and the reversion and reversions, remainder and remainders, rents, issues and profits of the real property;

To have and to hold the real property above described with the appurtenances, unto GRANTEE, and to GRANTEE's heirs, and successors and assigns forever.

GRANTOR reserves to itself and its successors and assigns a 20 foot wide access easement over, through, within, under, across and along the East and South boundaries of Section 3, Township 20 North, Range 23 East.

GRANTOR reserves to itself the exclusive right and privilege to enter on the property for the purposes of exploration and prospecting for the development, extraction, mining, production, removal and sale of all minerals, mineral substances, metals, ore-bearing materials, coal, oil, gas, other hydrocarbons, geothermal steam, liquids or brines, heat, other geothermal resources and rocks of every kind, except sand and gravel. The mineral estate and rights reserved to Grantor include all of the right, title and interest to minerals in, on or under the property, including, but not limited to, the surface and subsurface of the property, all minerals, mineral elements and compounds and ores, together with all easements and rights-of-way reserved or granted in, on or under the property, together with any and all lodes, veins and mineral deposits extending from or into or contained in the



property. The term "minerals" shall include all mineral elements and compounds, including by way of example and not by limitation, all barite, copper, gold, iron, silver and other metals, whether the same are presently known to exist on the property or are subsequently discovered on the property, and regardless of the method of extraction, mining or processing of the same (whether open pit or strip mining, underground mining, surface or subsurface leaching) whether presently or subsequently employed, invented, or developed. Grantor reserves to itself the rights of egress and ingress to and from the property for any and all purposes related to the mineral estate reserved to Grantor. Grantor shall conduct all of its activities in accordance with all applicable laws, regulations, and ordinances, and shall defend, indemnify and hold Grantee from and against all actions, claims, damages and losses resulting from Grantor's exercise of the rights appurtenant to its reserved mineral estate. Grantor shall compensate Grantee for surface damages resulting from Grantor's activities related to Grantor's reserved mineral estate. If Grantee and Grantor are unable to mutually determine the damages resulting to the surface, such damages shall be determined by a mutually acceptable independent appraiser who shall determine the fair market value of the surface damaged as a result of Grantor's activities.

**GRANTOR** makes no representation or warranty concerning the effect of those Minerals Leases, by and between Southern Pacific Land Company, a California corporation, as lessor, and SFP Minerals Corporation, a Delaware corporation, as lessee, to the degree or the extent that the same applies and is enforceable against the property described in this Grant, Bargain and Sale Deed, if at all.

**GRANTOR** has executed this Grant, Bargain and Sale Deed the day and year first above written.

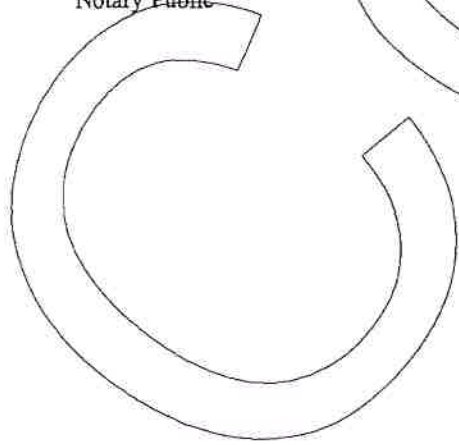
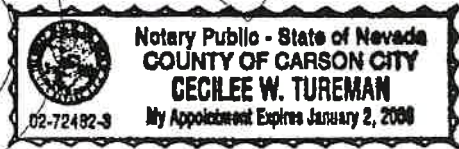
**NEVADA LAND AND RESOURCE COMPANY, LLC, A  
DELAWARE-LIMITED LIABILITY COMPANY**

By: *Dorothy A. Timian-Palmer*  
Dorothy A. Timian-Palmer  
Chief Operating Officer

STATE OF NEVADA )  
 ) ss.  
COUNTY OF CARSON CITY )

This instrument was acknowledged before me on August 1, 2003, by Dorothy A. Timian-Palmer its Chief Operating Officer of and for Nevada Land and Resource Company, LLC, a Delaware limited liability company.

*Cecilee W. Tureman*  
Notary Public





**EXHIBIT " A "**

All that real property situate in the County of Washoe, State of Nevada,  
described as follows:

**PARCEL A:**

A.P.N. 079-150-09

The Northeast  $\frac{1}{4}$  and the South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  and the South  $\frac{1}{2}$  in  
Section 33, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar  
and other valuable minerals as reserved by the United States of America or the  
State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores  
within or underlying the property, including, without limitation, oil, natural gas  
and hydrocarbon substances, geothermal steam, brines and minerals in solution,  
and sand gravel and aggregates, and products derived therefrom, together with  
any rights of ingress and egress in, upon or over the property and to make such  
use of the property and the surface thereof as is necessary or useful in  
connection therewith, as reserved in the Deed recorded January 09, 1990 in  
Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL B:**

A.P.N. 079-150-10

Section 31, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar  
and other valuable minerals as reserved by the United States of America or the  
State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores  
within or underlying the property, including, without limitation, oil, natural gas  
and hydrocarbon substances, geothermal steam, brines and minerals in solution,  
and sand gravel and aggregates, and products derived therefrom, together with





any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL C:**

A.P.N. 079-150-13

The Northeast  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of Section 27, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL D:**

A.P.N. 084-040-02

Section 5, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such



use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL E:**

A.P.N. 084-040-04

Section 3, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL F:**

A.P.N. 084-040-06

Section 1, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection



therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL G:**

A.P.N. 084-040-10

The North  $\frac{1}{2}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the Southwest  $\frac{1}{4}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northeast  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$ , all in Section 11, Township 20 North, Range 23 East, M.D.B.&M.

ALSO EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL H:**

A.P.N. 084-130-07

The Northwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Southwest  $\frac{1}{4}$  and Government Lot 1 in the Southwest  $\frac{1}{4}$  of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with





any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL I:**

A.P.N. 084-140-17

The Northeast  $\frac{1}{4}$  of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

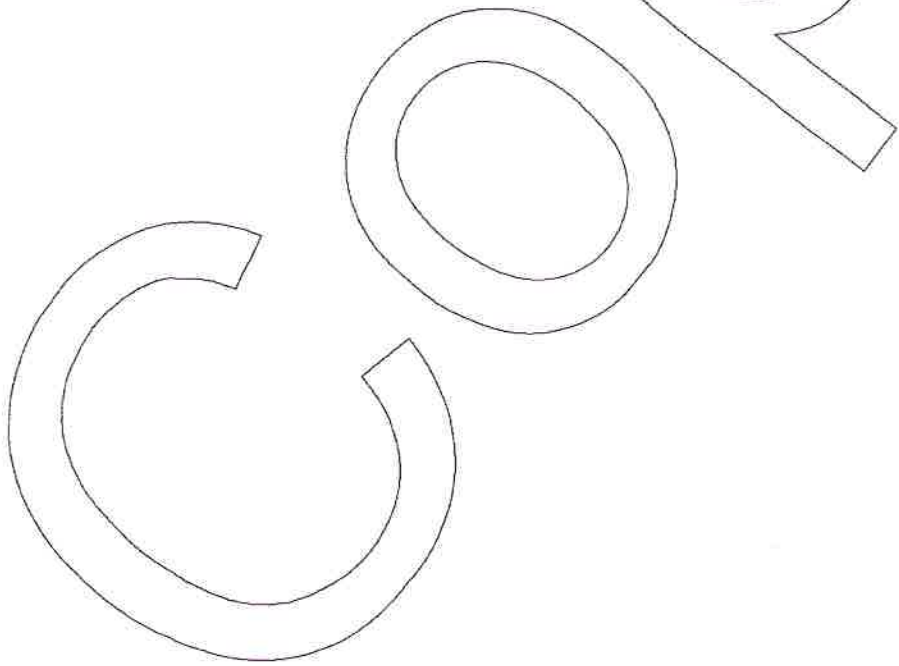


Exhibit 28

Exhibit 28

APN: 079-150-09,10,13 084-040-02,04,06,10 084-130-07  
RPTT \$#3 **0844017**

**DOC # 2900593**  
08/08/2003 03:48P Fee:18.00  
BK1  
Requested By  
WESTERN TITLE COMPANY INC  
Washoe County Recorder  
Kathryn L. Burke - Recorder  
Pg 1 of 8 RPTT 0.00



**WHEN RECORDED MAIL TO:**  
Name REZA ZANDIAN C/O  
Street 2827 S. MONTE CRISTO WAY  
City,State LAS VEGAS, NV 89117-2952  
Zip

**MAIL TAX STATEMENTS TO:**  
Name STAR LIVING TRUST DATED APRIL 14,  
1997  
Street 2827 S. MONTE CRISTO WAY  
City,State LAS VEGAS, NV 89117-2952  
Zip  
Order No. 00025269-501- DBR 00130277

(SPACE ABOVE THIS LINE FOR RECORDERS USE)

### GRANT, BARGAIN AND SALE DEED

THIS INDENTURE WITNESSETH: That NILOO FAR FOUGHANI, a married woman, in consideration of \$10.00, the receipt of which is hereby acknowledged, does hereby Grant, Bargain, Sell and Convey to REZA ZANDIAN, a married man as his sole and separate property all that real property situated in the City of N/A, County of Washoe, State of Nevada described as follows:

SEE LEGAL ATTACHED HERETO AND MADE A PART HEREOF

TOGETHER with all and singular the tenements, hereditaments and appurtenances, if any, thereto belonging or appertaining, and any reversions, remainders, rents, issues or profits thereof.

Grantor and Grantee are wife and husband. It is the intention of Grantor that Grantee shall henceforth have and hold said real property as his sole and separate property. By this conveyance, Grantor releases any community interest that she might now have or be presumed to hereafter acquire in the above described property.

Dated: July 31, 2003

STATE OF NEVADA

COUNTY OF CLARK

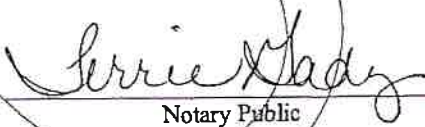
} ss

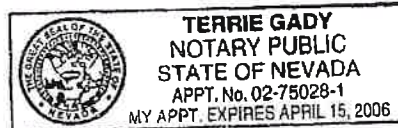
  
NILOO FAR FOUGHANI

This instrument was acknowledged before me on

AUGUST 5, 2003

by NILOO FAR FOUGHANI

  
Notary Public





**EXHIBIT " A "**

All that real property situate in the County of Washoe, State of Nevada,  
described as follows:

**PARCEL A:**

A.P.N. 079-150-09

The Northeast ¼ and the South ½ of the Northwest ¼ and the South ½ in  
Section 33, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar  
and other valuable minerals as reserved by the United States of America or the  
State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores  
within or underlying the property, including, without limitation, oil, natural gas  
and hydrocarbon substances, geothermal steam, brines and minerals in solution,  
and sand gravel and aggregates, and products derived therefrom, together with  
any rights of ingress and egress in, upon or over the property and to make such  
use of the property and the surface thereof as is necessary or useful in  
connection therewith, as reserved in the Deed recorded January 09, 1990 in  
Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL B:**

A.P.N. 079-150-10

Section 31, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar  
and other valuable minerals as reserved by the United States of America or the  
State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores  
within or underlying the property, including, without limitation, oil, natural gas  
and hydrocarbon substances, geothermal steam, brines and minerals in solution,  
and sand gravel and aggregates, and products derived therefrom, together with



any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL C:**

A.P.N. 079-150-13

The Northeast  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of Section 27, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL D:**

A.P.N. 084-040-02

Section 5, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such





use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL E:**

A.P.N. 084-040-04

Section 3, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL F:**

A.P.N. 084-040-06

Section 1, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection



therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL G:**

A.P.N. 084-040-10

The North  $\frac{1}{2}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the Southwest  $\frac{1}{4}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northeast  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$ , all in Section 11, Township 20 North, Range 23 East, M.D.B.&M.

ALSO EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL H:**

A.P.N. 084-130-07

The Northwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Southwest  $\frac{1}{4}$  and Government Lot 1 in the Southwest  $\frac{1}{4}$  of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with





any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

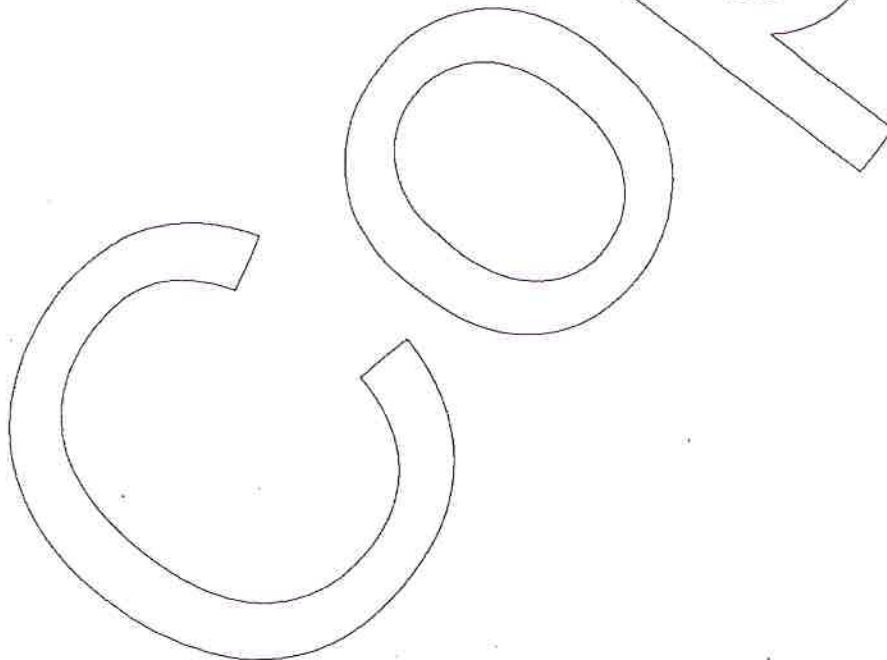
**PARCEL I:**

A.P.N. 084-140-17

The Northeast  $\frac{1}{4}$  of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.



# Exhibit 29

# Exhibit 29

**DOC # 3547263**

06/22/2007 04:41:06 PM

Requested By  
JOHN PETER LEE

Washoe County Recorder

Kathryn L. Burke - Recorder

Fee: \$132.00 RPTT: \$0.00

Page 1 of 119



JUDGMENT CONFIRMING  
ARBITRATION AWARD

Recording requested by:

JOHN PETER LEE, LTD.

Return to:

John Peter Lee, Ltd.  
830 Las Vegas Boulevard South  
Las Vegas, NV 89101

This page added to provide additional information required by NRS 111.312  
Sections 1-2. (Additional recording fee applies.)

**JOHN PETER LEE, LTD.**  
ATTORNEYS AT LAW  
830 LAS VEGAS BOULEVARD SOUTH  
LAS VEGAS, NEVADA 89101  
Telephone (702) 382-4044  
Telecopier (702) 383-9950

1 JUDGE  
JOHN PETER LEE, LTD.  
2 JOHN PETER LEE, ESQ.  
Nevada Bar No. 001768  
3 MICHAEL A. REYNOLDS, ESQ.  
Nevada Bar No. 008631  
4 830 Las Vegas Boulevard South  
Las Vegas, Nevada 89101  
5 (702) 382-4044 Fax: (702) 383-9950  
Attorneys for Plaintiff/Counterdefendant

FILED  
JUN 8 10 51 AM '07  
*[Signature]*  
CLERK OF THE COURT

**DISTRICT COURT**  
**CLARK COUNTY, NEVADA**

9 GHOLAMREZA ZANDIAN JAZI,  
10 Plaintiff,

CASE NO.: A511131  
DEPT. NO.: XI

11 v.

12 RAY KOROGHLI, individually, FARIBORZ FRED  
13 SADRI, individually, and as Trustee of the Star  
Living Trust, WENDOVER PROJECT, LLC, a  
14 Nevada limited liability company; BIG SPRING  
RANCH, LLC, a Nevada limited liability company,  
15 and NEVADA LAND AND WATER  
RESOURCES, LLC, a Nevada limited liability  
16 company,

Defendants.

**JUDGMENT CONFIRMING**  
**ARBITRATION AWARD**

18 RAY KOROGHLI, individually and FARIBORZ  
19 FRED SADRI, individually,

Counterclaimants,

DATE: 6-5-07  
TIME: 9:00 a.m.

20 v.

21 GHOLAMREZA ZANDIAN JAZI,  
22 Counterdefendant.

24 WENDOVER PROJECT, LLC,  
25 Counterclaimant,

26 v.

27 GHOLAMREZA ZANDIAN JAZI,  
28 Counterdefendant.

1 GHOLAMREZA ZANDIAN JAZI,  
 2 Counterclaimant,  
 3 v.  
 4 WENDOVER PROJECT, LLC,  
 5 Counterdefendant.

6 1334.022860-JLR

7 ZANDIAN'S MOTION FOR CONFIRMATION AND ENTRY OF JUDGMENT ON  
 8 ARBITRATION AWARD and the Defendants' COUNTERMOTION TO VACATE  
 9 ARBITRATION AWARD having come before this Court on Tuesday, June 5, 2007, the Honorable  
 10 Elizabeth Gonzalez presiding, and the Court being fully apprised in the premises and good cause  
 11 appearing, it is hereby

12 ORDERED that Plaintiff's MOTION FOR CONFIRMATION AND ENTRY OF  
 13 JUDGMENT ON ARBITRATION AWARD is granted, and Defendants' COUNTERMOTION TO  
 14 VACATE ARBITRATION AWARD is denied.

15 IT IS FURTHER ORDERED that this Court confirms the Arbitration Awards made and  
 16 entered by Floyd A. Hale, Esq., and enters judgment on the Arbitration Awards as follows:

17 IT IS ORDERED, ADJUDGED AND DECREED that all of the relief granted by the  
 18 aforesaid Arbitrator in his Arbitration Decision dated the 20th day of September, 2006, a copy of  
 19 which is attached hereto as Exhibit "1" is granted by this Court.

20 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Arbitrator's Decision  
 21 Denying Defendants' Motion to Change Award dated the 11th day of October, 2006, a copy of which  
 22 is attached hereto as Exhibit "2" is granted by this Court.

23 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all relief granted in the  
 24 Implementation Award dated the 29th day of November, 2006, a copy of which is attached hereto  
 25 as Exhibit "3" is granted by this Court.

26 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Arbitrator's Report  
 27 and Recommendation to District Court dated the 28th day of February, 2007, a copy of which is  
 28 attached hereto as Exhibit "4" is granted by this Court.

JOHN PETER LEE, LTD.  
 ATTORNEYS AT LAW  
 830 LAS VEGAS BOULEVARD SOUTH  
 LAS VEGAS, NEVADA 89101  
 Telephone (702) 382-4044  
 Telecopier (702) 383-9950



1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this Court retains  
2 jurisdiction to implement this Judgment.


3 Dated this 7 day of June, 2007.

4   
5 Honorable Elizabeth Gonzalez  
6 District Court Judge

7 SUBMITTED BY:

8 JOHN PETER LEE, LTD.

9  
10 BY:

  
11 JOHN PETER LEE, ESQ.  
12 Nevada Bar No. 001768  
13 MICHAEL A. REYNOLDS, ESQ.  
14 Nevada Bar No. 008631  
15 830 Las Vegas Boulevard South  
16 Las Vegas, Nevada 89101  
17 Ph: (702) 382-4044/Fax: (702) 383-9950  
18 Attorneys for Plaintiff/Counterdefendant

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25  
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27  
28  
JOHN PETER LEE, LTD.  
ATTORNEYS AT LAW  
830 LAS VEGAS BOULEVARD SOUTH  
LAS VEGAS, NEVADA 89101  
Telephone (702) 382-4044  
Telecopier (702) 383-9950

  
CLERK OF COURT

JUN 8 '07

DOCUMENT ATTACHED IS A  
TRUE AND CORRECT COPY  
OF THE ORIGINAL  
- 3 - ON FILE

COPY

**EXHIBIT ONE**



**RECEIVED**  
SEP 22 2006  
JOHN PETER LEE, LTD.

1 ARB  
2 FLOYD A. HALE, ESQ.  
3 Nevada Bar No. 1873  
4 JAMS  
5 2300 W. Sahara, #900  
6 Las Vegas, NV 89102  
7 Ph: (702) 457-5267  
8 Fax: (702) 437-5267  
9 Arbitrator

DISTRICT COURT  
CLARK COUNTY, NEVADA

10 GHOLAMREZA ZANDIAN JAZI,  
11 Plaintiff,

Case No. A51N31  
Dept. No. XII

12 vs.

13 RAY KOROGHLI, individually,  
14 FABIRORZ FRED SADRI, individually,  
15 and as Trustee of the Star Living Trust,  
16 WENDOVER PROJECT, LLC, a Nevada  
17 limited liability company; BIG SPRING  
18 RANCH, LLC, a Nevada limited liability  
19 company, and NEVADA LAND AND  
20 WATER RESOURCES, LLC, a Nevada  
21 limited liability company,

Defendants.

ARBITRATION DECISION

22 Arbitration Hearings in this matter were conducted for two full days. The parties  
23 submitted voluminous exhibits, depositions and briefs to the Arbitrator. Having reviewed the  
24 documentation submitted and having heard the testimony and representations of the parties, the  
25 following Arbitration Decision is entered:

26 1. The entire interest in the Pah Rah, LLC, property will be transferred to Gholamreza  
27  
28

FLOYD A. HALE,  
SPECIAL MASTER  
2300 W. SAHARA, SUITE 900  
LAS VEGAS, NEVADA 89102  
PHONE (702) 457-5267 EMAIL fhaale@floyd hale.com

1 Zandian Jazi, free and clear of all encumbrances, including the promissory note secured by Deed  
2 of Trust issued for the benefit of Fariborz Fred Sadri; any obligation owed to Jeff Codega, related  
3 to work that was performed as to the Pah Rah real estate will be the obligation of Gholamreza  
4 Zandian Jazi;

5  
6 2. The 320 acres referenced in the briefs and this lawsuit will be transferred free and clear  
7 to Gholamreza Zandian Jazi without any obligation to the other litigants or parties to this  
8 Arbitration or to any other party who may profess to have an interest in the 320 acres that are  
9 bound by this lawsuit and Arbitration;

10  
11 3. Fariborz Fred Sadri and Ray Koroghli will, within 30 days from the service of this  
12 Arbitration Decision, pay Gholamreza Zandian Jazi \$250,000.00 in return for Gholamreza  
13 Zandian Jazi waiving any claims or any rights as to the Big Springs Ranch, LLC or any of its  
14 assets;

15  
16 4. That Gholamreza Zandian Jazi will transfer any interest in the Wendover project, LLC,  
17 including all assets and real estate to Fariborz Fred Sadri and Ray Koroghli;

18  
19 5. All of the entities and properties that are the subject of this Arbitration and lawsuit,  
20 including Pah Rah, LLC, the owners of the 300 acres referenced above, the Big Springs Ranch,  
21 LLC, and the Wendover purchase or Wendover Project, LLC, referenced in this lawsuit and  
22 Arbitration waive any claims to reimbursement or participation in any consulting fees previously  
23 paid to Gholamreza Zandian Jazi from the seller of the real estate to those entities;


24  
25 6. That the parties, through counsel, will prepare all necessary documents to effect the  
26 transfers of the real estate assets and LLC entities and the parties to this lawsuit and Arbitration  
27 will execute all necessary documents to effect this Arbitration Order, including a mutual Release  
28 to be executed by all parties.

FLUVIDA, MALE  
SPECIAL MASTER  
2300 W. . AVE. SUITE 900  
LAS VEGAS, NEVADA 89102  
PHONE (702) 457-5267 EMAIL fma@fluyd.com

7. That each party pay their own fees and costs incurred herein.

DATED this 20<sup>th</sup> day of September, 2006.

By:

  
FLOYD HALE, Arbitrator  
2300 West Sahara Avenue, #900  
Las Vegas, NV 89102

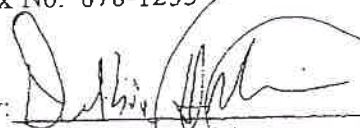
CERTIFICATE OF FACSIMILE AND MAIL

I hereby certify that on the 21 day of September, 2006, I faxed and mailed a true and correct copy of the foregoing addressed to:

John Peter Lee, Esq.  
830 Las Vegas Boulevard South  
Las Vegas, NV 89101  
Attorneys for Plaintiffs  
Fax No. 383-9950

John Netzorg, Esq.  
2810 West Charleston Blvd. #H-81  
Las Vegas, NV 89102  
Attorneys for Defendants  
Fax No. 878-1255

By:

  
Employee of Jams

FLOYD A. HALE  
SPECIAL MASTER  
2300 W. S  
VE. SUITE 900  
LAS VEG,  
NVADA 89102  
PHONE (702) 457-5267 EMAIL fhaile@floydhaile.com

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2989592  
06/22/2007  
3 of 7

**EXHIBIT " A "**

All that real property situate in the County of Washoe, State of Nevada,  
described as follows:

**PARCEL A:**

A.P.N. 079-150-09

The Northeast  $\frac{1}{4}$  and the South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  and the South  $\frac{1}{2}$  in  
Section 33, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar  
and other valuable minerals as reserved by the United States of America or the  
State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores  
within or underlying the property, including, without limitation, oil, natural gas  
and hydrocarbon substances, geothermal steam, brines and minerals in solution,  
and sand gravel and aggregates, and products derived therefrom, together with  
any rights of ingress and egress in, upon or over the property and to make such  
use of the property and the surface thereof as is necessary or useful in  
connection therewith, as reserved in the Deed recorded January 09, 1990 in  
Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL B:**

A.P.N. 079-150-10

Section 31, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar  
and other valuable minerals as reserved by the United States of America or the  
State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores  
within or underlying the property, including, without limitation, oil, natural gas  
and hydrocarbon substances, geothermal steam, brines and minerals in solution,  
and sand gravel and aggregates, and products derived therefrom, together with





2989592  
08/06/2003  
4 of 7

any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL C:**

A.P.N. 079-150-13

The Northeast  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of Section 27, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL D:**

A.P.N. 084-040-02

Section 5, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such



2988592  
08/06/2003  
5 of 7

use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL E:**

A.P.N. 084-040-04

Section 3, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

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**PARCEL F:**

A.P.N. 084-040-06

Section 1, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

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2988592  
08/06/2003  
6 of 7

therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL G:**

A.P.N. 084-040-10

The North  $\frac{1}{2}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the Southwest  $\frac{1}{4}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northeast  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$ , all in Section 11, Township 20 North, Range 23 East, M.D.B.&M.

ALSO EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL H:**

A.P.N. 084-130-07

The Northwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Southwest  $\frac{1}{4}$  and Government Lot 1 in the Southwest  $\frac{1}{4}$  of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with

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2988592  
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7 of 7

any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

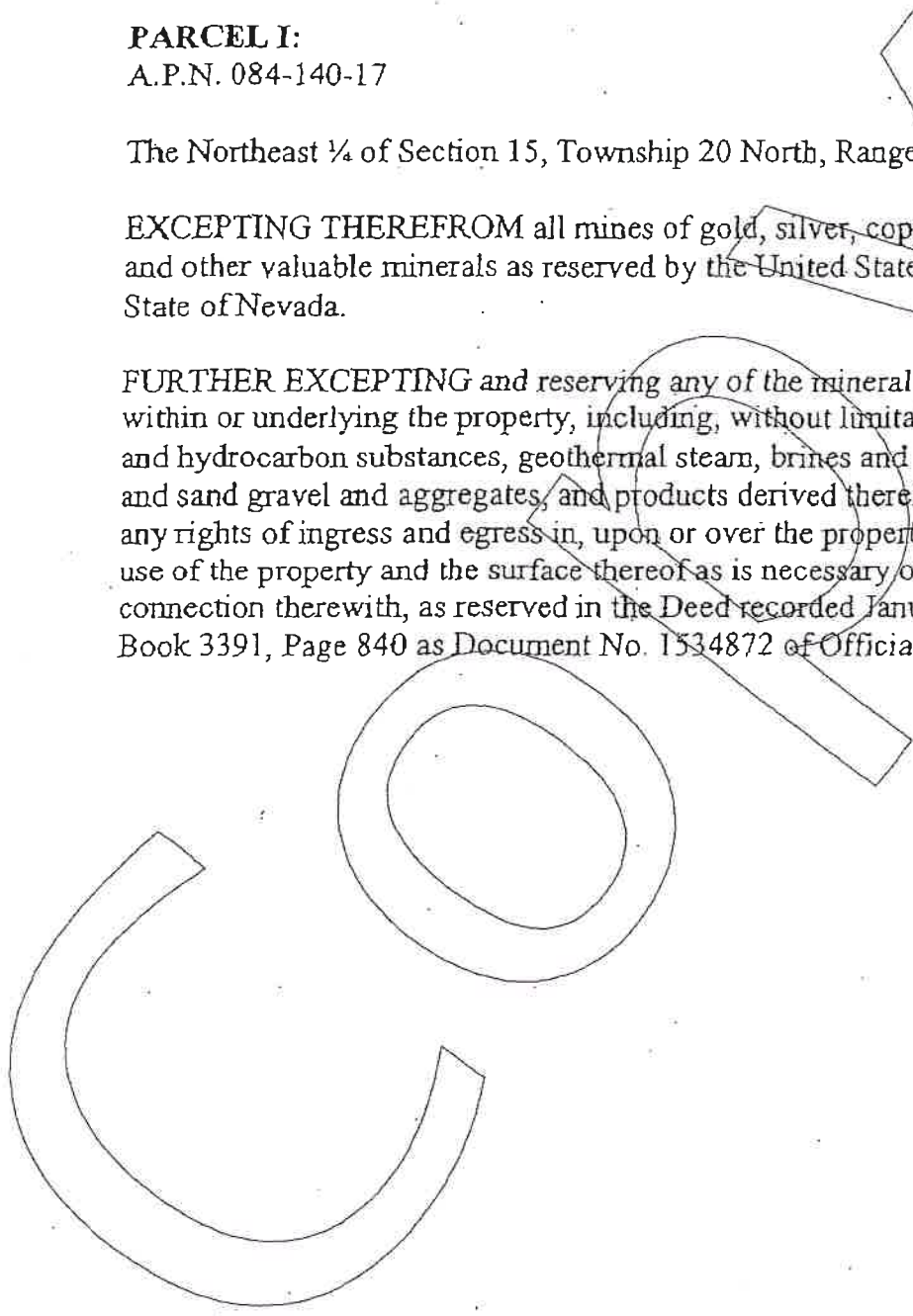
**PARCEL I:**

A.P.N. 084-140-17

The Northeast ¼ of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.



COPY

**Exhibit 5**

**REQUEST FOR FULL RECONVEYANCE**

TO: Western Title Company, Inc., Trustee

The undersigned is the legal owner and holder of the Note or Notes, and of all other indebtedness secured by the attached Deed of Trust. Said Note or Notes, together with all other indebtedness secured by said Deed of Trust, have been fully paid and satisfied; and you are hereby requested and directed to cancel said note or notes above mentioned, and all other evidences of indebtedness secured by said Deed of Trust delivered to you herewith, together with the Deed of Trust, and to reconvey, without warranty, to Gholamreza Zandian Jazi all the estate now held by you under the same.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
Fariborz Fred Sadri

STAR LIVING TRUST

BY: \_\_\_\_\_  
Fariborz Fred Sadri, Trustee

Pah Rah parcel

Exhibit 30

Exhibit 30

**DOC # 4335755**

03/18/2014 04:28:04 PM  
Requested By  
A+ PARALEGALS INC  
Washoe County Recorder  
Laurence R. Burtness - Recorder  
Fee: \$22.00 RPTT: \$0.00  
Page 1 of 6

APN: 079-150-09, 079-150-10, 079-150-13,  
084-040-02, 084-040-04, 084-040-06,  
084-040-10, 084-130-07, 084-140-17

Recording Requested by:  
Grantor, Reza Zandian



When Recorded Mail Document and tax statements to:  
Niloofar Foughani  
6 rue Edouard Fournier  
75116 Paris, France

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

**GRANT DEED**

I, Reza Zandian, hereby grant said property from, FRED SADRI Trustee of the Star Living Trust, dated April 14, 1997, as to an undivided 1/3 interest, RAY KOROGHLI and SATHSOWI THAY KOROGHLI, as Managing Trustees of the KOROGHLI MANAGEMENT TRUST, as to an undivided 1/3 interest and REZA ZANDIAN, a married man as his sole and separate property, as to an undivided 1/3 interest, as tenants in common, to, FRED SADRI Trustee of the Star Living Trust, dated April 14, 1997, as to an undivided 1/3 interest, RAY KOROGHLI and SATHSOWI THAY KOROGHLI, as Managing Trustees of the KOROGHLI MANAGEMENT TRUST, as to an undivided 1/3 interest and ALBORZ ZANDIAN, an unmarried man, 6.66%, and Niloofar Foughani, 19.98% (on behalf of herself 6.66%, Nikan Zandian Jazi 6.66% and Rayan Zandian 6.66%) (per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003), as tenants in common.

The land referred to herein is situated in the State of Nevada, Washoe County, described as follows:

See Exhibit "A"

Together with all and singular the tenements, hereditaments and appurtenances belonging or in anywise appertaining, to the real property, and any reversions, remainders, rents, issues and profits of the real property.

March 12, 2014

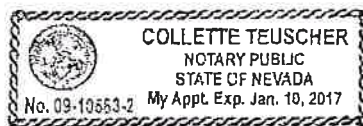
Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-

State of Nevada  
County of Washoe

This instrument was acknowledged before me on March 12, 2014 by Reza Zandain.

Collette Teuscher  
Notary Public



-THIS ACKNOWLEDGEMENT IS ATTACHED TO A GRANT DEED  
Dated March 12, 2014

COPY



EXHIBIT "A"

All that real property situate in the County of Washoe, State of Nevada, described as follows:

**PARCEL A:**  
**APN 079-150-09**

The Northeast  $\frac{1}{4}$  and the South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  and the South  $\frac{1}{2}$  in Section 33, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL B:**  
**APN 079-150-10**

Section 31, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL C:**  
**APN 079-150-13**

The Northeast  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$ ; South  $\frac{1}{2}$  of Section 27, Township 21 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 09, 1990 in Book 3019, Page 756 as Document No. 1373452 of Official Records.

**PARCEL D:  
APN 084-040-02**

Section 5, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded February 22, 1991 in Book 3216, Page 526 as Document No. 1461483 of Official Records.

**PARCEL E:  
APN 084-040-04**

Section 3, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL F:**  
**APN 084-040-06**

Section 1, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL G:**  
**APN 084-040-10**

The North  $\frac{1}{2}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the Southwest  $\frac{1}{4}$  of the Northwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northeast  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  of the Southeast  $\frac{1}{4}$ , all in Section 11, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL H:**  
**APN 084-130-07**

The Northwest  $\frac{1}{4}$  and the North  $\frac{1}{2}$  of the Southwest  $\frac{1}{4}$  and Government Lot 1 in the Southwest  $\frac{1}{4}$  of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon

substances, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

**PARCEL I:**  
**APN 084-140-17**

The Northeast ¼ of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

EXCEPTING THEREFROM all mines of gold, silver, copper, lead, cinnabar and other valuable minerals as reserved by the United States of America or the State of Nevada.

FURTHER EXCEPTING and reserving any of the minerals and mineral ores within or underlying the property, including, without limitation, oil, natural gas and hydrocarbon substance, geothermal steam, brines and minerals in solution, and sand gravel and aggregates, and products derived therefrom, together with any rights of ingress and egress in, upon or over the property and to make such use of the property and the surface thereof as is necessary or useful in connection therewith, as reserved in the Deed recorded January 03, 1992 in Book 3391, Page 840 as Document No. 1534872 of Official Records.

COPR



# Exhibit 31

# Exhibit 31

Schedule K-1 (Form 1065)

Department of the Treasury Internal Revenue Service

2014

For calendar year 2014, or tax year beginning ... 2014 ending ... 20

Partner's Share of Income, Deductions, Credits, etc.

See back of form and separate instructions.

Final K-1 Amended K-1

Part III Partner's Share of Current Year Income, Deductions, Credits, and Other Items

Table with 3 columns: Line number, Description, and Amount. Includes rows for Ordinary business income (loss), Net rental real estate income (loss), Other net rental income (loss), Guaranteed payments, Interest income, Ordinary dividends, Qualified dividends, Royalties, Net short-term capital gain (loss), Net long-term capital gain (loss), Alternative minimum tax (AMT) items, Collectibles (28%) gain (loss), Unrecaptured section 1250 gain, Net section 1231 gain (loss), Tax-exempt income and nondeductible expenses, Other income (loss), Distributions, Section 179 deduction, Other deductions, Other information, Self-employment earnings (loss).

Part I Information About the Partnership

Form section for Part I: A Partnership's employer identification number (20-3009062), B Partnership's name, address, city, state, and ZIP code (DAYTON PLAZA LLC, 1401 S LAS VEGAS BLVD, LAS VEGAS, NV 89104), C IRS Centar where partnership filed return (e-file), D Check if this is a publicly traded partnership (PTP).

Part II Information About the Partner

Form section for Part II: E Partner's identifying number (Partner: 1), F Partner's name, address, city, state, and ZIP code (REZA ZANDIAN, 1401 LAS VEGAS BLVD SOUTH, LAS VEGAS, NV 89104), G General partner or LLC member-manager (checked), Limited partner or other LLC member, H Domestic partner (checked), Foreign partner, I1 What type of entity is this partner? (Passive individual), I2 If this partner is a retirement plan (IRA/SEP/Keogh/etc.), check the box, J Partner's share of profit, loss, and capital (see instructions) table, K Partner's share of liabilities at year end.

Form section for L Partner's capital account details: Beginning capital account (\$94,515), Capital contributed during the year, Current year increase (decrease) (-311), Withdrawals & distributions, Ending capital account (\$94,204). Includes checkboxes for Tax basis, GAAP, Section 704(b) book, and Other (explain). M Did the partner contribute property with a built-in gain or loss? (No checked).

Section for IRS Use Only: \*See attached statement for additional information.



# Exhibit 32

# Exhibit 32

**Item C.** If the partnership is filing its return electronically, enter "e-file." Otherwise, enter the name of the IRS service center where the partnership will file its return. See *Where to File*, earlier.

## Part II. Information About the Partner

Complete a Schedule K-1 for each partner. On each Schedule K-1, enter the partner's name, address, identifying number, and distributive share items.

### Items E and F

For an individual partner, enter the partner's social security number (SSN) or individual taxpayer identification number (ITIN). For all other partners, enter the partner's EIN. However, if a partner is an individual retirement arrangement (IRA), enter the identifying number of the custodian of the IRA. Do not enter the identification number of the person for whom the IRA is maintained.

Foreign partners without a U.S. identifying number should be notified by the partnership of the necessity of obtaining a U.S. identifying number. Certain aliens who are not eligible to obtain SSNs can apply for an ITIN on Form W-7, Application for IRS Individual Taxpayer Identification Number.

If a single member limited liability company (LLC) owns an interest in the partnership, and the LLC is treated as a disregarded entity for federal income tax purposes, enter the owner's identifying number in item E and the owner's name and address in item F.

**Truncating recipient's identification number on Schedule K-1.** The partnership can truncate a partner's identifying number on the Schedule K-1 the partnership sends to the partner. Truncation is not allowed on the Schedule K-1 the partnership files with the IRS. Also, the partnership cannot truncate its own identification number on any form.

To truncate, where allowed, replace the first five digits of the nine-digit number with asterisks (\*) or Xs (for example, an SSN xxx-xx-xxxx would appear as \*\*\*-\*\*-xxxx or XXX-XX-xxxx). For more information, see Regulations section 301.6109-4.

**Foreign address.** If the partner has a foreign address, enter the information in the following order: City or town, state or province, country and ZIP or foreign postal code. Follow the country's practice for entering the postal code. Do not abbreviate the country name.

### Item G

Complete item G on all Schedules K-1. If a partner holds interests as both a general and limited partner, check both boxes and attach a statement for each activity that shows the amounts allocable to the partner's interest as a limited partner.

### Item H. Domestic/Foreign Partner

Check the foreign partner box if the partner is a nonresident alien individual, foreign partnership, foreign corporation, foreign estate, foreign trust, or foreign government. Otherwise, check the domestic partner box.

### Item I1. What Type of Entity Is This Partner?

State whether the partner is an individual, a corporation, an estate, a trust, a partnership, a disregarded entity, an exempt organization, a foreign government, or a nominee (custodian). If the entity is a limited liability company (LLC) and it is treated as other than a disregarded entity for federal income tax purposes, the partnership must enter the LLC's classification for federal income tax purposes (that is, a corporation or partnership). If the partner is a nominee, use one of the following codes after the word "nominee" to indicate the type of entity the nominee represents: I—Individual; C—Corporation; F—Estate or Trust; P—Partnership; DE—Disregarded Entity; E—Exempt Organization; IRA—Individual Retirement Arrangement; or FGOV—Foreign Government.

### Item J. Partner's Profit, Loss, and Capital

On each line, enter the partner's percentage share of the partnership's profit, loss, and capital as of the beginning and end of the partnership's tax year, as determined under the partnership agreement. If a partner's interest commences after the beginning of the partnership's tax year, enter in the *Beginning* column the percentages that existed for the partner immediately after admission. If a partner's interest terminates before the end of the partnership's tax year, enter in the *Ending* column the percentages that existed immediately before termination.

On the line for *Capital*, enter the percentage share of the capital that the partner would receive if the partnership was liquidated by the distribution of undivided interests in partnership assets and liabilities. If the partner's capital account is negative or zero, express the percentage ownership of capital as zero.

The partner's percentage share of each category must be expressed as a percentage. The percentage must not be negative. The total percentage interest in each category must total 100% for all partners. To determine whether the total beginning and ending percentages are 100%, do not include the beginning percentage for a partner that was not a partner at the beginning of the partnership's tax year or the ending percentage for a partner that left the partnership before the end of the partnership's tax year. If the partnership agreement does not express the partner's share of profit, loss, and capital as fixed percentages, the partnership may use a reasonable method in arriving at each percentage for purposes of completing the

items required by item J, as long as such method is consistent with the partnership agreement and is applied consistently from year to year. Maintain records to support the share of profits, share of losses, and share of capital reported for each partner.

### Item K. Partner's Share of Liabilities

Enter each partner's share of nonrecourse liabilities, partnership-level qualified nonrecourse financing, and other recourse liabilities at the end of the year.

"Nonrecourse liabilities" are those liabilities of the partnership for which no partner (or related person) bears the economic risk of loss. The extent to which a partner bears the economic risk of loss is determined under the rules of Regulations section 1.752-2. Do not include partnership-level qualified nonrecourse financing (defined below) on the line for nonrecourse liabilities.

If the partner terminated his or her interest in the partnership during the year, enter the share that existed immediately before the total disposition. In all other cases, enter it as of the end of the year.

If the partnership is engaged in two or more different types of at-risk activities, or a combination of at-risk activities and any other activity, attach a statement showing the partner's share of nonrecourse liabilities, partnership-level qualified nonrecourse financing, and other recourse liabilities for each activity. See Pub. 925 to determine if the partnership is engaged in more than one at-risk activity.

The at-risk rules of section 465 generally apply to any activity carried on by the partnership as a trade or business or for the production of income. These rules generally limit the amount of loss and other deductions a partner can claim from any partnership activity to the amount for which that partner is considered at risk. However, for partners who acquired their partnership interests before 1987, the at-risk rules do not apply to losses from an activity of holding real property the partnership placed in service before 1987. The activity of holding mineral property does not qualify for this exception. Identify on an attached statement to Schedule K-1 the amount of any losses that are not subject to the at-risk rules.

If a partnership is engaged in an activity subject to the limitations of section 465(c)(1) (such as films or videotapes, leasing section 1245 property, farming, or oil and gas property), give each partner his or her share of the total pre-1978 losses from that activity for which there existed a corresponding amount of nonrecourse liability at the end of each year in which the losses occurred. See Form 6198, At-Risk Limitations, and related instructions for more information.

Qualified nonrecourse financing secured by real property used in an activity of holding real property that is subject to the at-risk rules is treated as an amount at risk.

# Exhibit 33

# Exhibit 33

trade or business activity in which the partner had an interest (either directly or indirectly).

e. Net royalty income from intangible property if the partner acquired the partner's interest in the partnership after the partnership created the intangible property or performed substantial services, or incurred substantial costs in developing or marketing the intangible property.

15. Identify separately the credits from each activity conducted by or through the partnership.

16. Identify the partner's distributive share of the partnership's self-charged interest income or expense (see *Self-Charged Interest*, earlier).

a. **Loans between a partner and the partnership.** Identify the lending or borrowing partner's share of the self-charged interest income or expense. If the partner made the loan to the partnership, also identify the activity in which the loan proceeds were used. If the proceeds were used in more than one activity, allocate the interest to each activity based on the amount of the proceeds used in each activity.

b. **Loans between the partnership and another partnership or an S corporation.** If the partnership's partners have the same proportional ownership interest in the partnership and the other partnership or S corporation, identify each partner's share of the interest income or expense from the loan. If the partnership was the borrower, also identify the activity in which the loan proceeds were used. If the loan proceeds were used in more than one activity, allocate the interest to each activity based on the amount of the proceeds used in each activity.

## Net Investment Income Tax Reporting Requirements

**Note.** The information described in this section should be given directly to the partner and should not be reported by the partnership to the IRS.

To allow partners to correctly figure the net investment income tax where a partner disposes of an interest in the partnership during the tax year, the partnership may be required to provide the partner with certain information. The net investment income tax is a tax imposed on an individual, trust, or estate's net investment income. Net investment income includes the net gains or losses from the sale of an interest in the partnership. A partner who is actively involved in one or more of the partnership or lower tier pass-through entities' trades or businesses (other than trading in financial instruments or commodities) can reduce the amount of the gain or loss from the sale of the partnership or lower tier pass-through entity interest included in its net investment income. However, to figure its net investment income, the active partner needs certain information from the partnership.

Generally, the partnership must provide certain information to the partner if the

partnership knows, or has reason to know, the following.

1. The partner disposed of an interest in the partnership.

2. The partner materially participates (within the meaning of the passive activity loss rules (section 469)) in one or more of the trades or businesses (within the meaning of section 162) of the partnership or a lower tier pass-through entity (other than trading in financial instruments or commodities).

3. The partner does not qualify for the optional simplified reporting method for figuring its net investment income associated with the disposition of the interest. For more information, see the Instructions for Form 8960, Line 5c.

### Information to be provided to partner.

Generally, the partnership must provide the partner with its distributive share of the net gain and loss from the deemed sale for fair market value of the partnership's property, other than property that relates to the trades or businesses in which the partner materially participates, as determined under the passive activity loss rules applicable to the transfer of an interest in a pass-through entity. For more information see the Instructions for Form 8960, Line 5c.

**Note.** If a partner, who qualifies for the optional simplified reporting method, prefers to determine net gain or loss under the general calculation, the partnership may, but is not obligated to, provide the information to the partner at that partner's request.

## Extraterritorial Income Exclusion

See the Form 8873, Extraterritorial Income Exclusion, to determine whether the partnership qualifies for the exclusion and to figure the amount of the exclusion. If the partnership's foreign trading gross receipts do not exceed \$5 million and the partnership does not meet the foreign economic process requirements for the exclusion, it must report certain information to its partners. See the instructions below on how to report the exclusion on the partnership's return and the information it must report to its partners.

The partnership must report the extraterritorial income exclusion on its return as follows.

1. If the partnership met the foreign economic process requirements explained in the Instructions for Form 8873, it can report the exclusion as a nonseparately stated item on whichever of the following lines apply to that activity.

- Form 1065, page 1, line 20;
- Form 8825, line 15; or
- Form 1065, Schedule K, line 3b.

In addition, the partnership must report as an item of information on Schedule K-1, box 16, using code O, the partner's distributive share of foreign trading gross receipts from Form 8873, line 15.

2. If the foreign trading gross receipts of the partnership for the tax year are \$5 million

or less and the partnership did not meet the foreign economic process requirements, it cannot report the extraterritorial income exclusion as a nonseparately stated item on its return. Instead, the partnership must report the following separately stated items to the partners on Schedule K-1, box 16.

- Foreign trading gross receipts (code O). Report each partner's distributive share of foreign trading gross receipts from line 15 of Form 8873 in box 16 using code O.

- Extraterritorial income exclusion (code P). Report each partner's distributive share of the extraterritorial income exclusion from line 52 of Form 8873 in box 16 using code P and identify on an attached statement the activity to which the exclusion relates. If the partnership is required to complete more than one Form 8873, combine the exclusions from line 52 and report a single exclusion amount in box 16.

**Note.** Upon request of a partner, the partnership should furnish a copy of the partnership's Form 8873 if that partner has a reduction for international boycott operations, illegal bribes, kickbacks, etc.

## Specific Instructions

These instructions follow the line numbers on the first page of Form 1065. The accompanying schedules are discussed separately. Specific instructions for most of the lines are provided. Lines that are not discussed are self-explanatory.

Fill in all applicable lines and schedules.

Enter any items specially allocated to the partners in the appropriate box of the applicable partner's Schedule K-1. Enter the total amount on the appropriate line of Schedule K. Do not enter separately stated amounts on the numbered lines on Form 1065, page 1, on Form 1125-A, or on Schedule D.

File all five pages of Form 1065. However, if the answer to question 6 of Schedule B is "Yes," Schedules L, M-1, and M-2 on page 5 are optional. Also attach a Schedule K-1 to Form 1065 for each partner.

File only one Form 1065 for each partnership. Mark "Duplicate Copy" on any copy you give to a partner.

If a syndicate, pool, joint venture, or similar group files Form 1065, it must attach a copy of the agreement and all amendments to the return, unless a copy has previously been filed.

**Note.** A foreign partnership required to file a return generally must report all of its foreign and U.S. source income. For rules regarding whether a foreign partnership must file Form 1065, see *Who Must File*, earlier.

## Name and Address

Print or type the legal name of the partnership, address, and EIN on the appropriate lines. If the partnership has



changed its name, check box G(3). Include the suite, room, or other unit number after the street address. If the Post Office does not deliver mail to the street address and the partnership has a P.O. box, show the box number instead.

If the partnership receives its mail in care of a third party (such as an accountant or an attorney), enter on the street address line "C/O" followed by the third party's name and street address or P.O. box.

If the partnership's address is outside the United States or its possessions or territories, enter the information on the line for "City or town, state or province, country, and ZIP or foreign postal code" in the following order: city, province or state, and the foreign country. Follow the foreign country's practice in placing the postal code in the address. Do not abbreviate the country name.

If the partnership has changed its address since it last filed a return (including a change to an "in care of" address), check box G(4) for "Address change."

**Note.** If the partnership changes its mailing address or the responsible party after filing its return, it can notify the IRS by filing Form 8822-B, Change of Address or Responsible Party-Business.

## Items A and C

Enter the applicable activity name and the code number from the list, *Codes for Principal Business Activity and Principal Product or Service*, near the end of the instructions.

For example, if, as its principal business activity, the partnership (a) purchases raw materials, (b) subcontracts out for labor to make a finished product from the raw materials, and (c) retains title to the goods, the partnership is considered to be a manufacturer and must enter "Manufacturer" in item A and enter in item C one of the codes (311110 through 339900) listed under "Manufacturing" on the list, *Codes for Principal Business Activity and Principal Product or Service*, near the end of the instructions.

## Item D. Employer Identification Number (EIN)

Show the correct EIN in item D. If the partnership does not have an EIN, it must apply for one:

- Online—Click on the Employer ID Numbers (EINs) link at [www.irs.gov/Businesses/Small-Businesses-&Self-Employed/Small-Business-and-Self-Employed-Tax-Center-1](http://www.irs.gov/Businesses/Small-Businesses-&Self-Employed/Small-Business-and-Self-Employed-Tax-Center-1). The EIN is issued immediately once the application information is validated.
- By mailing or faxing Form SS-4, Application for Employer Identification Number.

A limited liability company must determine which type of federal tax entity it will be (that is, partnership, corporation, or

disregarded entity) before applying for an EIN (see Form 8832, Entity Classification Election, for details). If the partnership has not received its EIN by the time the return is due, enter "Applied for" and the application date in the space for the EIN. For more details, see the Instructions for Form SS-4.

**Note.** The online application process is not yet available for partnerships with addresses in foreign countries. If you are located outside the United States, please call 1-267-941-1099.

Do not request a new EIN for a partnership that terminated because of a sale or exchange of at least 50% of the total interests in partnership capital and profits.

## Item F. Total Assets

You are not required to complete item F if the answer to question 6 of Schedule B is "Yes."

If you are required to complete this item, enter the partnership's total assets at the end of the tax year, as determined by the accounting method regularly used in keeping the partnership's books and records. If there were no assets at the end of the tax year, enter -0-.

## Item G

A technical termination (box G(6)) occurs when there has been a sale or exchange of 50% or more of the interests in partnership capital and profits within a 12-month period.

If this Form 1065 is being filed for the tax period ending on the date a technical termination has occurred, check box G(2) and box G(6). See *Termination of the Partnership*, earlier.

If this Form 1065 is being filed for the tax period beginning immediately after a technical termination has occurred, check box G(1) and box G(6). A new EIN is not needed in a technical termination. The new partnership that is formed will continue to use the EIN of the terminated partnership.

For information on amended returns, see *Amended Return*, earlier.

## Item J. Schedule C and Schedule M-3

A partnership must file Schedule M-3, Net Income (Loss) Reconciliation for Certain Partnerships, instead of Schedule M-1, if any of the following apply.

1. The amount of total assets at the end of the tax year reported on Schedule L, line 14, column (d) is \$10 million or more.
2. The amount of adjusted total assets for the tax year is \$10 million or more. Adjusted total assets is defined in the Instructions for Schedule M-3.
3. The amount of total receipts (as defined later, in the instructions for Schedule B, question 6), for the tax year, is \$35 million or more.
4. An entity that is a reportable entity partner of the partnership owns or is deemed to own, directly or indirectly, an interest of

50% or more in the partnership's capital, profit, or loss, on any day during the tax year of the partnership. Reportable entity partner is defined in the Instructions for Schedule M-3.

A partnership filing Form 1065 that is not required to file the Schedule M-3 may voluntarily file Schedule M-3 instead of Schedule M-1.


Any partnership that files Schedule M-3 must also complete and file Schedule C, Additional Information for Schedule M-3 Filers. See *Eased requirements* below.

**Eased requirements.** For tax years ending December 31, 2014, and later, partnerships that (a) are required to file Schedule M-3 and have less than \$50 million in total assets at tax-year-end, or (b) are not required to file Schedule M-3 and voluntarily file Schedule M-3, must either: (i) complete Schedule M-3 entirely; or (ii) complete Schedule M-3 through Part I and complete Schedule M-1 instead of completing Parts II and III of Schedule M-3. See *Schedule M-3* for more information.

In addition, partnerships that meet the requirements of (a) and (b) above are not required to file Schedule C (Form 1065) nor Form 8916-A.

See the Instructions for Schedule C and Schedule M-3 for more information.

## Income

 **Report only trade or business activity income on lines 1a through 8. Do not report rental activity income or portfolio income on these lines. See Passive Activity Limitations, earlier, for definitions of rental income and portfolio income. Rental activity income and portfolio income are reported on Schedules K and K-1. Rental real estate activities are also reported on Form 8825.**

**Tax-exempt income.** Do not include any tax-exempt income on lines 1a through 8. A partnership that receives any tax-exempt income other than interest, or holds any property or engages in any activity that produces tax-exempt income, reports this income on line 18b of Schedule K and in box 18 of Schedule K-1 using code B.

Report tax-exempt interest income, including exempt-interest dividends received as a shareholder in a mutual fund or other regulated investment company, on line 18a of Schedule K and in box 18 of Schedule K-1 using code A.

See *Deductions*, after the instructions for lines 1a through 8 and before the instructions for lines 9 through 21, for information on how to report expenses related to tax-exempt income.

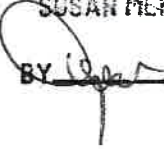
**Election to defer income from cancelled debt.** If the partnership elected to defer cancellations of debt (COD) income under section 108(i), the exclusions for COD under sections 108(a)(1)(A), (B), (C), and (D) do not apply to the income from the COD for the

1 SEVERIN A. CARLSON  
Nevada Bar No. 9373  
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Telephone: (775) 882-1311  
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scarlson@kcnvlaw.com  
6 tzimmerman@kcnvlaw.com

7 Attorneys for Defendant  
REZA ZANDIAN

REC'D & FILED

2015 JUL 20 PM 2:14

SUSAN MERRIWETHER  
CLERK  
BY  DEPUTY

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

11 JED MARGOLIN, an individual,  
12 Plaintiff,  
13 vs.

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

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

20  
21 **DEFENDANT REZA ZANDIAN'S REPLY IN SUPPORT OF**  
22 **MOTION FOR PROTECTIVE ORDER**

23 Defendant REZA ZANDIAN ("Defendant" or "Zandian"), by and through his counsel  
24 Kaempfer Crowell, hereby submits his Reply ("Reply") in Support of Motion for Protective

KAEMPFER CROWELL  
510 West Fourth Street  
Carson City, Nevada 89703



1 Order ("Motion"). This Reply is supported by the papers and pleadings on file herein, the  
2 accompanying Memorandum of Points and Authorities, and any oral argument that may be  
3 entertained by this Court.

4 DATED this 20th day of July, 2015.

5 KAEMPFER CROWELL

6 BY:  #1027 per

7 SEVERIN A. CARLSON

Nevada Bar No. 9373

8 TARA C. ZIMERMANN

Nevada State Bar No. 12146

9 510 West Fourth Street

Carson City, Nevada 89703

10 **Attorneys for Defendant REZA ZANDIAN**

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 **I. LEGAL ARGUMENT**

13 **A. Mr. Zandian Cannot Be Made to Appear Before this Court for the**  
14 **Requested Judgment Debtor Examination.<sup>1</sup>**

15 The plain language of NRS 21.270 precludes Plaintiff from requiring Zandian to travel to  
16 Carson City, Nevada for the purpose of conducting the judgment debtor examination. Pursuant to  
17 NRS 21.270, "no judgment debtor may be required to appear [for a judgment debtor  
18 examination] outside the county in which he resides." NRS 21.271 (1)(b). Zandian is a resident  
19 of France, and not of Carson City. Attached hereto is a utility bill for Mr. Zandian's residence in  
20

21 <sup>1</sup> Zandian is permitted to respond to arguments presented by Plaintiff regarding the debtor examination of  
22 Zandian and the requested discovery from Zandian in this Reply. Zandian's Motion applied to both the debtor  
23 examination and discovery requests propounded on Zandian, as well as the third-party subpoenas. *See* Defendant  
24 Reza Zandian's Opposition to Plaintiff's Motion for Judgment Debtor Examination and to Produce Documents and  
Motion for Protective Order at 8:22-9:2 (requesting as follows: "to the extent that this Court orders that any debtor's  
examination is permitted at all, a protective order should be issued limiting the first phase of post-judgment  
discovery to the judgment debtor only. And such discovery should be limited to information and documents that are  
relevant to judgment debtor's current assets, meaning at most, such information and documents should be limited to  
the past three years."). Accordingly, it is proper for Zandian to address these arguments in this Reply, and Plaintiff's  
request to respond to the arguments presented herein must be denied.

1 France. See **Exhibit 1**. The due date for this bill is June 25, 2015 and reflects Zandian's address  
2 at 6 Rue Edouard Fournier 75116 Paris. *Id.* Attached as well are Mr. Zandian's most recent  
3 Paris residency and French ownership taxes for 2014, which similarly reflect Zandian's French  
4 address of 6 Rue Edouard Fournier 75116 Paris. See **Exhibit 2**. Finally, attached hereto are  
5 copies of Zandian's passport listing his Country of Residency as France, as well as a copy of  
6 Zandian's French residency permit with the date of entry to France of March 15, 2012 and an  
7 expiration date of August 5, 2015. See **Exhibit 3**.

8 The documents relied upon by Plaintiff in his Opposition to Motion for Protective Order  
9 ("Opposition") do not, as Plaintiff asserts, "indicate[] that Zandian resides and does business  
10 throughout Nevada, including Carson City, Nevada." Opposition at 5:21-23. The deeds Plaintiff  
11 cites to and attaches as Exhibits 7-9, 13-15, 19, 21-22 and 25 were all signed in the spring of  
12 2014, approximately 15 months ago. That Mr. Zandian traveled to Carson City to execute the  
13 deeds in 2014 does not evidence his residency as of today. The 2014 Schedule K-1 is similarly  
14 inapposite. We are now seven and a half months removed from the last day covered by the 2014  
15 K-1. What's more, this K-1 was filed by Zandian's partners - not Zandian himself - and his  
16 partners did not have his updated information in France at the time they filed this schedule.

17 Moreover, despite Plaintiff's assertion to the contrary, Nevada case law does not mandate  
18 that Zandian appear at a debtor examination before this Court in Carson City even if he were a  
19 resident of Nevada. Plaintiff has cited absolutely no Nevada case law supporting this assertion,  
20 relying instead on a non-binding Federal District of Nevada case. See *Rausch v. World Series of*  
21 *Golf, Inc.*, 2012 U.S. Dist. LEXIS 59911, 2012 WL 1517294 (D.Nev. Apr. 23, 2012). This case,  
22 however, does not stand for the proposition that Plaintiff relies upon it for. The issue in this case  
23 was not whether a non-resident of Nevada can be hailed into Court for a debtor examination in  
24 contradiction of the plain language of NRS 21.270(1). Nowhere in *Rausch* was the issue of

1 residency and NRS 21.270(1) discussed or contemplated. Rather, the issue before that court was  
2 simply the application of NRS 21.270(3), which states:

3 [a] judgment debtor who is regularly served with an order issued  
4 pursuant to [NRS 21.270], and who fails to appear at the time and  
5 place specified in the order, may be punished for contempt by the  
6 judge issuing the order.

7 Unlike in *Rausch*, this Court has not yet issued an order requiring Zandian to appear for a  
8 judgment debtor examination – this is in fact the very issue remaining to be resolved by this  
9 motion practice. Accordingly, Plaintiff’s reliance on the *Rausch* case is misplaced. Nevada law is  
10 clear: “no judgment debtor may be required to appear [for a judgment debtor examination]  
11 outside the county in which he resides.” NRS 21.270(1). Plaintiff has cited no authority to the  
12 contrary, and has provided no evidentiary proof that Zandian is a resident of Carson City. For  
13 these reasons, Zandian must not be required to appear for the debtor examination and Plaintiff’s  
14 motion to require such must be denied. For the same reasons, Zandian’s Motion must be granted.

15 **B. The Documents Sought From Zandian Are Not Reasonably Calculated to**  
16 **Lead to the Discovery of Relevant Evidence.**

17 The requests upon Zandian amount to an over-sweeping, overly broad and burdensome  
18 review of all of Zandian’s financial records. Zandian appreciates Plaintiff’s concession that  
19 request k. is limitless in duration, but disagrees with Plaintiff’s characterization of a. and j. as  
20 being limited. Neither of these requests contains a time frame or limit on the information being  
21 sought, and are each objectionable for that reason.

22 The remaining requests, while they do contain a time frame, are similarly overbroad and  
23 oppressive. Plaintiff has not shown why he needs records dating back more than eight years.  
24 That Zandian executed an agreement with his family on August 21, 2003, and that he allegedly  
signed fraudulent assignment documents with the U.S. Patent and Trademark office in 2007,

1 have absolutely no bearing on his current assets. Moreover, all of the transfers of real estate  
2 Plaintiff complains of occurred in 2014. These 2014 transfers do not make it reasonable for  
3 Plaintiff to seek discovery of documents going back more than seven years prior to 2007.  
4 Instead, it appears that Plaintiff is improperly trying to use discovery related to the requested  
5 judgment debtor examination to harass Zandian by conducting a “carte blanche” invasion into  
6 facts entirely unrelated to Zandian’s current assets available to satisfy the judgment. *Schlatter v.*  
7 *Eighth Judicial District Court*, 93 Nev. 189, 561 P.2d 1342 (1977) (Nevada recognizes that the  
8 discovery rules do not provide for a “carte blanche” invasion into a party’s private affairs); *In re*  
9 *Surety Assoc. of Am.*, 388 F.2d 412, 414 (2nd Cir. 1967) (Parties are not permitted to “roam in  
10 the shadow zones of relevancy” in an attempt to explore irrelevant matters on the theory that they  
11 may conceivably become so.). Given the overbroad nature of the requests, Zandian requests that  
12 the Court deny Plaintiff’s Motion to Produce Documents in its entirety. Alternatively, Zandian  
13 requests that this Court modify the requests and permit discovery of only such records related to  
14 the current assets of the judgment debtor, or those dating back no further than the last three  
15 years.

16  
17 **C. A Protective Order Prohibiting the Production Requested in the Subpoenas is Proper.**

18 As an initial matter, Zandian did attempt in good faith to resolve this issue. Contrary to  
19 the representation made in Plaintiff’s Opposition, in attempting to resolve the discovery dispute,  
20 Zandian’s counsel, Ms. Zimmerman,<sup>2</sup> did not propose to resolve the dispute by offering to have

21  
22 <sup>2</sup> It is not inappropriate for Ms. Zimmerman to represent Zandian in this action on account of her serving as a  
23 law clerk to Judge Russell. The Nevada Rules of Professional Conduct do not require Ms. Zimmerman to recuse  
24 herself from representation as she neither participated in this action personally nor substantially while serving as a  
law clerk to Judge Russell. *See* NEV. R. PROF. COND. 1.12(a) (“Except as stated in paragraph (d), a lawyer shall not  
represent anyone in connection with a matter in which the lawyer participated personally and substantially as a judge  
or other adjudicative officer, or law clerk to such a person or as an arbitrator, mediator or other third-party neutral,  
unless all parties to the proceeding give informed consent confirmed in writing.”). Ms. Zimmerman has no personal  
recollection of this case, and explained such to counsel for Plaintiff. Ms. Zimmerman further explained that she  
clerked for Judge Russell from August 2010 through August 2011 and that, given the nature of the actions that

1 Zandian produce the records requested in the subpoena in lieu of the subpoenaed parties.  
2 Likewise, Ms. Zimmerman never took any such resolution off any table. Rather,  
3 Ms. Zimmerman simply stated that which is presented in Zandian's Motion: that this discovery  
4 being sought from third-parties related to Zandian's assets is available from a less-intrusive  
5 source – the judgment debtor himself. This is a basic principle of discovery and is codified in  
6 Nevada's Rules of Civil Procedure. *See* NRCPP 26(b)(1). Seeking these records from a third-party  
7 without first requesting the same from the party himself makes the subpoenas objectionable.  
8 Plaintiff must follow the required procedure for obtaining discovery and cannot simply ignore  
9 NRCPP 26. Given the nature of these documents, Plaintiff cannot bypass requesting these records  
10 from a less-intrusive source and instead issue harassing, oppressive, burdensome and annoying  
11 subpoenas to third-parties at his own misguided discretion.

12 Plaintiff makes the nonsensical argument that he should be permitted to seek these  
13 records from third-parties because he “has not been provided the requested documents by  
14 Zandian himself.” Opposition at 10:14-15. However, Zandian has not been ordered to produce  
15 any records related to his assets. The issue of any such production is still pending before this  
16 Court pursuant to Plaintiff's Motion for Judgment Debtor Examination and to Produce  
17 Documents. Thus, that Zandian has not produced these documents cannot serve as a valid basis  
18 for permitting this improper third-party discovery.

19 Plaintiff asserts that he “is not aware of any rule that requires ‘concrete evidence of a  
20 concealed or fraudulently transferred asset’ before the discovery can go forward”. *See*  
21 Opposition at 10:22-25. While the Nevada Rules of Civil Procedure do not contain this language  
22 verbatim, interpreting substantially similar rules, courts have held that the rules of civil

23 occurred during that time, even if she had been personally involved in the matter, that involvement was not  
24 “substantial”. As importantly, none of the actions taken in this case during Ms. Zimmerman's clerkship are currently  
at issue before this Court. The only actions that occurred in this action during that time were the entry of default(s)  
and the issuance of an order denying Zandian's Motion to Dismiss and setting aside a default against him. Default  
was later reentered against Zandian, leading to the present proceedings.



1 procedure do not permit discovery intended as a “fishing expedition” on the basis of the  
2 propounding party’s speculation of relevancy. *Zuk v. E. Penn. Psych. Inst.*, 103 F.3d 294, 299  
3 (3rd Cir. 1996); *see also Oppenheimer Fund*, 437 U.S. at 351 (stating that “discovery, like all  
4 matters of procedure, has ultimate and necessary boundaries”). Parties are not entitled to open-  
5 ended and unlimited discovery based solely on the theory that there may be concealed assets and  
6 cannot use this supposition to gain access to financial books and records of third-parties without  
7 concrete evidence that specific assets are being concealed. *Id.* at 299. Furthermore, Plaintiff must  
8 show undue hardship with respect to not being able to proceed without the requested  
9 information. *Wardleigh v. Second Judicial Dist. Court*, 111 Nev. 345, 891 P.2d 1180 (1995). As  
10 shown herein and in Zandian’s Motion, Plaintiff will not be able to show such a hardship given  
11 the narrow issue – judgment debtor’s present assets currently available to pay the judgment  
12 against him. Accordingly, consistent with Zandian’s Motion, to the extent that this Court orders  
13 that any debtor examination is permitted at all, a protective order should be issued limiting the  
14 first phase of post-judgment discovery to the judgment debtor only. And such discovery should  
15 be limited to information and documents that are relevant to judgment debtor’s current assets,  
16 meaning at most, such information and documents should be limited to the past three years.  
17 Then, only if concrete evidence of a concealed or fraudulently transferred asset is developed,  
18 should this Court even consider expanding discovery to any third-party who allegedly has the  
19 asset.

## 20 II. CONCLUSION

21 For the reasons stated herein, a protective order should be issued with respect to  
22 Plaintiff’s Motion for Judgment Debtor Examination and to Produce Documents, as well as the  
23 third-party subpoenas.

24 //././



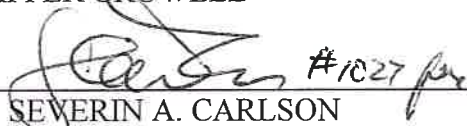
1 /././  
2 /././  
3 /././  
4 /././

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

7 DATED this 20<sup>th</sup> day of July, 2015.

8 KAEMPFER CROWELL

9 BY:

 #1027 pr

SEVERIN A. CARLSON

Nevada Bar No. 9373

TARA C. ZIMMERMAN

State Bar No. 12146

510 West Fourth Street

Carson City, Nevada 89703

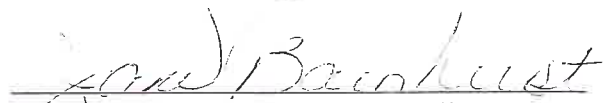
**Attorneys for Defendant REZA ZANDIAN**

**CERTIFICATE OF SERVICE**

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I, the undersigned, hereby certify that on the 20<sup>th</sup> day of July, 2015, I caused the foregoing DEFENDANT REZA ZANDIAN'S REPLY IN SUPPORT OF MOTION FOR PROTECTIVE ORDER to be served this date by depositing a true copy of the same for mailing at Carson City, Nevada, first class postage fully prepaid and addressed to the following:

Matthew D. Francis, Esq.  
Adam P. McMillen, Esq.  
Watson Rounds  
5371 Kietzke Lane  
Reno, Nevada 89511  
775.324.4100  
775.333.8171 - facsimile  
**Attorneys for Plaintiff**

  
James Bankhurst  
an employee of Kaempfer Crowell

# EXHIBIT 1

---

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# EXHIBIT 1

N° client : 6 003 992 790  
Identifiant internet : 3MTNETRBR4



295295 59959 8622  
1 / 3 365



Par Internet et Mobile  
espaceclient.edf.com  
sur Smartphone et Tablette  
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Du lundi au samedi de 8h et jusqu'à 21h  
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Service dépannage Electricité (ERDF)  
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Point de consommation

6 RUE EDOUARD FOURNIER  
75116 PARIS

Titulaire du contrat  
M. ZANDIAN JAZI GHOLAM REZA

Détail du contrat  
N° client : 6 003 992 790  
N° compte : 4 02 4 004 833 996  
à transmettre pour le règlement de  
factures

Electricité "Tarif Bleu"

Service de livraison (PDL)  
N° : 610 633 121  
Puissance : 06 kVA  
Type : Basse

#### INFORMATIONS

Information réglementaire  
Selon la réglementation en vigueur,  
les tarifs de la CSPE et des TCFE ont  
été modifiés au 01/01/2015. Sur décision des  
autorités de régulation, le Tarif Réglementé de Vente  
à partir du 01/11/2014 et le montant de la  
taxe sur le chiffre d'affaires au 01/08/2014. Vos Conditions  
de Vente ont été modifiées au  
01/08/2014. Plus d'information sur le site edf.fr

M. ZANDIAN JAZI GHOLAM REZA  
6 RUE EDOUARD FOURNIER  
75116 PARIS

**Facture du 25/06/2015**  
N° 32 195 821 941

Electricité (relevé client)	176,54 €
TVA	29,10 €

**Facture TTC 205,64 €**

Montant total  
**205,64 €**  
TTC

Prélevé le  
10/07/2015

#### Les prochaines étapes

- Prochaine facture vers le 07/12/2015.
- Prochaine relève ERDF vers le 07/12/2015.

**Prélèvement automatique**

# EXHIBIT 2

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# EXHIBIT 2



DIRECTION GENERALE DES FINANCES PUBLIQUES

# AVIS D'IMPÔT 2014

## TAXES FONCIÈRES

volées et perçues par la commune, le département et divers organismes.

6616006473 0004



CENTRE DES FINANCES PUBLIQUES  
SIP PARIS 16EME MUETTE  
12 RUE GEORGE SAND  
75796 PARIS CEDEX 16

eco' pli 77 LOGNES PIC 17.09.14 C10202



6616006473 0004

**M ZANDIAN JAZI GHOLAMZEZA**  
**GHOLAM REZA**  
**6 RUE EDOUARD FOURNIER**  
**75016 PARIS**

### Vos références

Numéro fiscal : 19 75 393 067 438  
Référence de ravis : 14 75 6034371 31

Numéro de propriétaire : 116 Z00554W

Débiteur(s) légal(aux)  
M ZANDIAN JAZI GHOLAMZEZA  
GHOLAM REZA

PROPRIETAIRE 4121 MGZDG8

Numéro de rôle : 221  
Date d'établissement : 08/08/2014  
Date de mise en recouvrement : 31/08/2014

### Votre situation

#### MONTANT À PAYER

Au plus tard le 15/10/2014

2 913,00 €

*payé  
chèque 272  
12/10/14 Nilod  
2913 €*

Attention modification de la loi :  
il est interdit de payer en espèces  
ce montant supérieur à 300 €

Attention : l'enveloppe retour est réservée au paiement par TIP ou par chèque bancaire. Ne joignez aucun autre document (sauf votre RIB si nécessaire)

Placer à découper en suivant les pointillés

Pour payer cet impôt, contactez vos conseillers d'impôts pour :



les modalités de paiement, les modalités de recours, les modalités de contestation, les modalités de recours en justice.

Les contribuables en résidence habituelle de 2 ans et titulaire du permis de conduire, qui ont un véhicule immatriculé en France, sont assujettis à la taxe foncière sur les véhicules (TFV) à compter du 1<sup>er</sup> janvier 2014. Cette taxe est due par le titulaire du permis de conduire, quel que soit le lieu de résidence du véhicule.

**ENI**  
Les logements situés en zone de loi localité sans accord avec le préfet de la région de l'Etat ou avec son subordonné de l'Agence nationale pour le logement (ANL) ou sans autorisation de l'Etat ou de l'ANL en vue de leur location ou d'habitation à titre temporaire aux personnes démunies peuvent être destinés à être affectés pour 15 ou 20 ans.  
Les logements neufs affectés à l'habitation principale et destinés pour plus de la moitié de leur surface à un usage de logement peuvent être destinés par un Etat ou l'ANL à être affectés pendant 15 ans. Dans certains cas, le durée d'affectation peut être prolongée à 20 ans.  
La durée d'affectation est prolongée à 20 ans si la durée de construction est prolongée. Pour les constructions nouvelles achevées à compter du 1<sup>er</sup> janvier 2014, la durée d'affectation est prolongée à 20 ans si les conditions de construction sont satisfaites.  
La durée d'affectation est prolongée à 20 ans si le logement est affecté à un usage de logement principal.

pendant les 10 (pour les particuliers), 20 (pour les résidents) ou 50 (pour les résidents) années qui suivent la vente, la construction ou la reconstruction du logement.  
Les taxes foncières destinées en équivalence de logement sont soumises à concurrence de 25 % pendant 15 ans.

**Dégrevements jeunes agriculteurs**  
Les jeunes agriculteurs bénéficiaires pendant les 5 années qui suivent celle de leur installation d'un dégrevement égal à 50 % de la taxe foncière sur les propriétés non bâties des propriétés qu'ils exploitent. Les communes ou les groupements peuvent, pour une durée de 1 à 5 ans et pour la part qui leur revient, porter ce dégrevement à 100 %.

**Régimes de CDI**  
- L. n° 1027 du 8 août 2001  
- L. n° 1472 du 30 oct. 1983 art. 736 E bis  
- L. n° 1384 du 2000 art. 1041 bis  
- L. n° 1020 du 04 oct. 1997 art. 6  
- L. n° 728 du 8 août 2003 art. 10



**DIRECTION GÉNÉRALE  
DES FINANCES PUBLIQUES**



**MISE EN DEMEURE DE PAYER**  
Art L 257 0A et L 258 A  
du Livre des procédures fiscales

Le 07/04/2015

L257 0A et L258 A  
POUR

**Pour nous contacter**

**Votre centre des finances publiques**

SIP PARIS 16EME MUETTE  
12 RUE GEORGE SAND  
75796 PARIS CEDEX 16  
Tél : 01 44 30 48 84  
Courriel :  
sip.paris-16e-muette@dgfip.finances.gouv.fr  
Accueil guichet : avec ou sans rendez-vous  
TLJ 9H-12H/13H30-16H SF JEUDI AM  
BCF: BDFEFRPPCCT FR76 3000 1000 6464 7200 0000 085

**Vos références**

Numéro de dossier : 827503315001218 075033  
Action : 1M00001

**CENTRE DES FINANCES PUBLIQUES**  
SIP PARIS 16EME MUETTE  
12 RUE GEORGE SAND  
75796 PARIS CEDEX 16



**M ZANDIAN JAZI  
GHOLAM REZA  
6 RUE EDOUARD FOURNIER  
PARIS  
75016 PARIS 16**

Madame, Monsieur,

Selon mes informations, vous n'avez pas payé les sommes dont le détail figure dans le tableau ci-dessous.

Je vous invite à régulariser votre situation sans délai.

À défaut, j'engagerai à votre encontre, à l'issue d'un délai de huit jours suivant la notification de la présente mise en demeure d'acquiescer, des poursuites pouvant occasionner des frais élevés.

Le présent document **TIENT LIEU DU COMMANDEMENT** prévu par le code des procédures civiles d'exécution.

Désignation des impositions (1)	Date (2)	Montant dû	Versements effectués	Reste à payer
Taxe habitation 2014 Rôle 78001	31/10/2014	4 487,00 €	0,00 €	4 487,00 €
Majoration	15/12/2014	449,00 €	0,00 €	449,00 €
			<b>Total dû :</b>	<b>4 936,00 €</b>

**\* Situation arrêtée au 07/04/2015**

Vous pouvez contester cette mise en demeure de payer auprès du directeur départemental des finances publiques dans les deux semaines suivant sa notification.

Je vous prie de croire, Madame, Monsieur, à l'assurance de ma considération distinguée.

Le comptable public

# EXHIBIT 3

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# EXHIBIT 3





RÉPUBLIQUE FRANÇAISE

AUTORISATION PROVISOIRE DE SÉJOUR

PREFECTURE DE POLICE N° 99130815603  
DOSSIER N° 10ST000000  
ENTRÉE EN FRANCE 15/03/2012

(M.) ZANDIAN JAZI  
PRENOMS GHOLAM REZA  
NÉ(E) LE 15/01/1962 A ISFAHAN  
NATIONALITÉ IRANIENNE  
ADRESSE 06 RUE EDOUARD FOURNIER  
75116 PARIS



EST AUTORISÉ(B) A PROLONGER PROVISOIREMENT  
SON SÉJOUR EN FRANCE JUSQU'AU 05/08/2015

CETTE AUTORISATION N'EST VALABLE QU'ACCOMPAGNÉ DU DOCUMENT  
N° H95628481 VALABLE DU 05/07/2013 AU 05/07/2018  
JUSTIFIANT DE L'IDENTITÉ DE SON TITULAIRE.

SIGNATURE ET CACHET  
DE L'AUTORITÉ

Pour le Préfet de Police et par délégation  
Le Directeur de la Police Générale

*Cyrille MAILLET*  
Cyrille MAILLET - M1

FAIT A PARIS (CITE)  
LE 06/05/2015

SIGNATURE  
DU TITULAIRE

VALABLE JUSQU'AU 05/08/2015  
02455778

CETTE AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

IMPRIMERIE NATIONALE

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  
2015 JUL 23 PM 3:32  
SUSAN MERRIWETHER  
DEPUTY

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

10 JED MARGOLIN, an individual,  
11 Plaintiff,

12 vs.

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

Case No.: 090C00579 1B

Dept. No.: 1

**REQUEST FOR HEARING  
ON MOTION FOR JUDGMENT  
DEBTOR EXAMINATION AND TO  
PRODUCE DOCUMENTS  
(FJDCR, Rule 15)**

21 TO: The Honorable James T. Russell, District Court Judge; and, Defendants and your  
22 attorneys of record:

23 Plaintiff Jed Margolin, by and through his counsel, hereby requests the Court conduct a  
24 hearing on Plaintiff's Motion for Judgment Debtor Examination and to Produce Documents,  
25 filed June 10, 2015.

26 The present request is made upon the following grounds:

27 1. On June 10, 2015, Plaintiff filed a Motion for Judgment Debtor Examination  
28 and to Produce Documents (proposed Order was attached as Exhibit 1);

1           2.       On June 29, 2015, Defendant Reza Zandian filed an Opposition to Plaintiff's  
2 Motion for Judgment Debtor Examination and to Produce Documents and Motion for  
3 Protective Order;

4           3.       On July 10, 2015, Plaintiff filed his Reply in Support of Motion for Judgment  
5 Debtor Examination and to Produce Documents and Opposition to Defendant Reza Zandian's  
6 Motion for Protective Order; and,

7           4.       On July 20, 2015, Defendant Reza Zandian filed his Reply in Support of  
8 Motion for Protective Order.

9           5.       Plaintiff submits that oral argument is warranted in this matter;

10          6.       First Judicial District Court Rule 15(9) provides in relevant part, as follows:

11                   **Rule 15. Motions and similar moving papers in civil cases.**

12                   ...

13                   9. Oral Argument. .... Either party may request a hearing, the grant or denial  
14                   of which shall lie within the Court's discretion.

15          7.       Plaintiff respectfully submits that good cause exists for the Court to conduct a  
16 hearing on Plaintiff's Motion for Judgment Debtor Examination and to Produce Documents.

17                                   **Affirmation Pursuant to NRS 239B.030**

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

20           DATED: July 22, 2015

WATSON ROUNDS

21           BY: 

22           Matthew D. Francis (6978)

23           Adam P. McMillen (10678)

24           5371 Kietzke Lane

25           Reno, NV 89511

26           Telephone: 775-324-4100

27           Facsimile: 775-333-8171

28           Attorneys for Plaintiff Jed Margolin



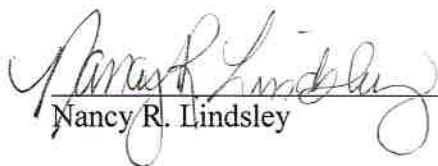
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**CERTIFICATE OF SERVICE**

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, **Request for Hearing on Plaintiff's Motion for Judgment Debtor Examination and to Produce Documents**, addressed as follows:

Severin A. Carlson  
Tara C. Zimmerman  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, NV 89703

Dated: July 22, 2015.

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

1 Adam P. McMillen, Bar No. 10678  
2 [amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)  
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
4 5371 Kietzke Lane,  
5 Reno, Nevada 89511  
6 Telephone: (775) 324-4100  
7 Facsimile: (775) 333-8171

8 Attorney for Plaintiff JED MARGOLIN

REC'D & FILED  
2015 SEP -9 PM 3:08  
SUSAN MERRIWETHER  
BY *[Signature]* CLERK  
DEPUTY

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

11 JED MARGOLIN, an individual,  
12 Plaintiff,

13 v.

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

CASE NO.: 090C00579 1B

DEPT NO.: 1

27 **NOTICE OF CHANGE OF FIRM AFFILIATION**

28 **PLEASE TAKE NOTICE** that effective September 1, 2015, Adam P. McMillen,  
attorney of record for Plaintiff, has changed his firm affiliation and email address. The new  
contact information for Plaintiff's counsel is as follows:

Adam P. McMillen (Nevada Bar No. 10678)  
Brownstein Hyatt Farber Schreck, LLP  
5371 Kietzke Lane  
Reno, Nevada 89511  
Email: [amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)

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**PLEASE TAKE FURTHER NOTICE** that the address and telephone numbers for Plaintiff's counsel remain unchanged.

DATED: This 8<sup>th</sup> day of September, 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: 

Adam P. McMillen  
5371 Kietzke Lane  
Reno, Nevada 89511  
Attorneys for Plaintiff JED MARGOLIN


**BROWNSTEIN HYATT FARBER SCHRECK, LLP**  
5371 Kietzke Lane  
Reno, Nevada 89511  
775-324-4100

**CERTIFICATE OF SERVICE**

Pursuant to NRC 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 8<sup>th</sup> day of September, 2015, I served the foregoing document entitled NOTICE OF CHANGE OF FIRM AFFILIATION AND EMAIL ADDRESSES via first class mail, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery the following:

Severin A. Carlson  
Tara C. Zimmerman  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, Nevada 89703

DATED: September 8, 2015

  
\_\_\_\_\_  
Employee of Brownstein Hyatt Farber Schreck, LLP

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
5371 Kietzke Lane  
Reno, Nevada 89511  
775-324-4100

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1 Adam P. McMillen, Bar No. 10678  
2 [amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)  
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
4 5371 Kietzke Lane,  
5 Reno, Nevada 89511  
6 Telephone: (775) 324-4100  
7 Facsimile: (775) 333-8171  
8 Attorney for Plaintiff JED MARGOLIN

REC'D & FILED  
2015 SEP 14 PM 3:12  
SUSAN MERRINWETHER  
CLERK  
BY *[Signature]* DEPUTY

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

11 JED MARGOLIN, an individual,  
12 Plaintiff,

CASE NO.: 090C00579 1B  
DEPT NO.: 1

13 v.

**REQUEST FOR SUBMISSION**

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

27 It is hereby requested that the Request for Hearing on Motion for Judgment Debtor  
28 Exmation and to Produce Documents, filed on July 23, 2015, be submitted to the Court for  
decision.

**AFFIRMATION**

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding

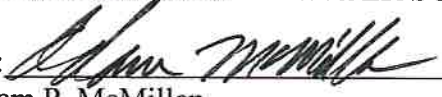
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document does not contain the social security number of any person.

DATED: September 10, 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: 

Adam P. McMillen  
5371 Kietzke Lane  
Reno, Nevada 89511  
Attorneys for Plaintiff JED MARGOLIN

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
5371 Kietzke Lane  
Reno, Nevada 89511  
775-324-4100



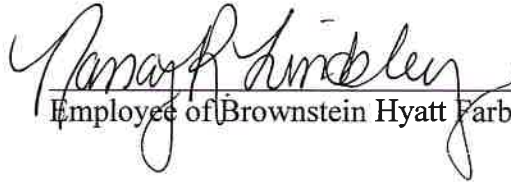
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 10th day of September, 2015, I served the foregoing document entitled REQUEST FOR SUBMISSION via first class mail, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery the following:

Severin A. Carlson  
Tara C. Zimmerman  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, Nevada 89703

DATED: September 11, 2015



Employee of Brownstein Hyatt Farber Schreck, LLP

REC'D & FILED ✓

2015 SEP 22 PM 1:15

SUSAN MERRIWETHER  
CLERK

BY \_\_\_\_\_  
DEPUTY

1 Case No.: 09 OC 00579 1B

2 Dept. No.: 1

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4  
5 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
6 IN AND FOR CARSON CITY  
7

8 JED MARGOLIN, an individual,

9 Plaintiff,

10 vs.

**ORDER TO SET FOR HEARING**

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

22 Defendants.

23 This matter is before this Court on a Request for Hearing on Motion for Judgment Debtor  
24 Examination and to Produce Documents (FJDCR, Rule 15) filed by Plaintiff on July 23, 2015. A  
25 Request for Submission was filed on September 14, 2015.

26 This Court having reviewed the Request and case file, and finds that a hearing regarding this  
27 matter would be helpful in determining the merits of this case. Therefore, good cause appearing;

28 ///

///

///

///

1 IT IS HEREBY ORDERED that the parties shall appear telephonically before the Judicial  
2 Assistant on Wednesday, October 7, 2015, between 9:00 a.m. and 9:30 a.m. to set this matter for  
3 hearing. The day prior to the setting, all parties shall contact the Court's Judicial Assistant (775-  
4 882-1996) to provide contact information for the setting.

5 Dated this 22<sup>nd</sup> day of September, 2015.

6   
7 JAMES T. RUSSELL  
8 DISTRICT JUDGE

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1 **CERTIFICATE OF MAILING**

2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the  
3 22<sup>nd</sup> day of September, 2015, I served a copy of the foregoing Order by United States Mail, postage  
4 prepaid, addressed as follows:

5 Adam P. McMillen, Esq.  
6 5371 Kietzke Lane  
7 Reno, NV 89511

8 Severin A. Carlson, Esq.  
9 Tara C. Zimmerman, Esq.  
10 510 West Fourth Street  
11 Carson City, NV 89703



12 \_\_\_\_\_  
13 Angela Jeffries  
14 Judicial Assistant, Dept. 1  
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In the First Judicial District Court of the State of Nevada  
In and For Carson City

\* \* \* \*

HEARING DATE MEMO

REC'D & FILED

2015 OCT -7 AM 11:30

SUSAN MERRIWETHER  
CLERK

BY  DEPUTY

Case No.: 09 OC 00579 1B

JED MARGOLIN, an individual,  
Plaintiff,

ADAM P. McMILLEN, Esq.  
Attorney for Plaintiff

vs.

OPTIMA TECHNOLOGY CORPORATION, et  
al.,

SEVERIN A. CARLSON, Esq.  
Attorney for Defendant

Defendant.

Set In Department: 1

HEARING on Motion for Judgment Debtor Examination and to Produce Documents

TO COMMENCE on the 5<sup>th</sup> day of November, 2015, at 9:30 a.m.

TIME ALLOWED 1 HOUR

NO. 1 Setting

Telephonic Setting  
Attorney for Plaintiff

DATED: October 7, 2015

Telephonic Setting  
Attorney for Defendant

James T. Russell  
JAMES T. RUSSELL  
District Judge

**CERTIFICATE OF SERVICE**


The undersigned, an employee of the Carson City Clerk/District Judge, hereby certifies that on the 7<sup>th</sup> day of October, 2015 I served the foregoing HEARING DATE MEMO by sending a copy thereof via U.S. Mail, postage prepaid, as follows:

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

Severin A. Carlson, Esq.  
510 West Fourth Street  
Carson City, NV 89703

SUBSCRIBED and SWORN to before me this  
7 day of October, 2015  
SUSAN MERRIWETHER, Clerk

BY:   
Deputy

  
Angela Jeffries  
Judicial Assistant, Dept. 1

0900005791B

IN THE SUPREME COURT OF THE STATE OF NEVADA

REC'D & FILED

2015 OCT 21 AM 10: 57

REZA ZANDIAN, A/K/A GOLAMREZA ZANDIANJAZI, A/K/A GHOLAM REZA ZANDIAN, A/K/A REZA JAZI A/K/A J. REZA JAZI, A/K/A G. REZA JAZI, A/K/A GHONOREZA ZANDIAN JAZI, AN INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL, Respondent.

REZA ZANDIAN A/K/A GOLAMREZA ZANDIANJAZI A/K/A GHOLAM REZA ZANDIAN A/K/A REZA JAZI A/K/A J. REZA JAZI A/K/A G. REZA JAZI A/K/A GHOLAMREZA ZANDIAN JAZI, AN INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL, Respondent.

No. 65205

BY *[Signature]* DEPUTY CLERK

FILED

OCT 19 2015

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
BY *S. Young*  
DEPUTY CLERK

No. 65960

**ORDER OF AFFIRMANCE**

These are appeals from district court post-judgment orders denying an NRCP 60(b) motion and awarding attorney fees and costs in a deceptive trade practice action. First Judicial District Court, Carson City; James Todd Russell, Judge.

Appellant's general denial was stricken by the district court as a sanction for failure to respond to discovery requests. A default judgment was thereafter entered against appellant and attorney fees and costs were awarded to respondent. Over five months after the entry of the default judgment, appellant filed an NRCP 60(b) motion seeking to set aside the



default judgment, which was denied by the district court. These appeals followed.<sup>1</sup>

The district court has broad discretion in deciding whether to grant or deny an NRCP 60(b) motion to set aside a judgment, and this court will not disturb that decision absent an abuse of discretion. *Cook v. Cook*, 112 Nev. 179, 181-82, 912 P.2d 264, 265 (1996); *see also NC-DSH, Inc. v. Garner*, 125 Nev. 647, 657-58, 218 P.3d 853, 861 (2009) (specifying that this court reviews a district court's denial of NRCP 60(b) relief for an abuse of discretion). Having reviewed the parties' briefs and appendices, we perceive no abuse of discretion in the district court's denial of appellant's NRCP 60(b) motion. The district court found that appellant failed to promptly move to set aside the default judgment, he did not show that he lacked intent to delay by failing to respond to the discovery requests and motions in the case, and he demonstrated inexcusable neglect by willfully failing to respond to or participate in the action. *See Kahne v. Orme*, 108 Nev. 510, 513-516, 835 P.2d 790, 792-94 (1992) (setting forth the factors a district court must consider in deciding an NRCP 60(b) motion), *overruled in part by Epstein v. Epstein*, 114 Nev. 1401, 950 P.2d 771 (1997). Accordingly, we affirm the district court's denial of appellant's NRCP 60(b) motion.

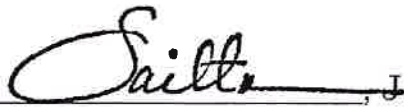
We further conclude that the district court did not abuse its discretion in awarding attorney fees and costs to respondent. Although NRS 598.0999(2) addresses public causes of action, NRS 41.600 provides for a private cause of action for deceptive trade practices under NRS

---

<sup>1</sup>We elect to consolidate these appeals for disposition. *See* NRAP 3(b).

598.0915 to NRS 598.0925 and mandates the award of attorney fees and costs to the claimant if they are the prevailing party. We further conclude that the district court did not abuse its discretion in finding respondent's counsel's hourly rate reasonable. See *Gunderson v. D.R. Horton, Inc.*, 130 Nev., Adv. Op. 9, 319 P.3d 606, 615 (2014) (stating that this court reviews an award or denial of attorney fees and costs for an abuse of discretion); *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 349-50, 455 P.2d 31, 33 (1969). Accordingly, we perceive no abuse of discretion in the district court's decision and affirm its award of attorney fees and costs.

It is so ORDERED.

 J.

Saitta

 J.

Gibbons

 J.

Pickering

cc: Hon. James Todd Russell, District Judge  
David Wasick, Settlement Judge  
Kaempfer Crowell/Carson City  
Kaempfer Crowell/Reno  
Watson Rounds  
Carson City Clerk

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Case No. 09 0C 00579 1B

Dept. No. I

REC'D & FILED

NOV -6 PM 3:38

SUSAN MERRIWETHER  
CLERK

BY  DEPUTY

In The First Judicial District Court of the State of Nevada

In and for Carson City

<p>JED MARGOLIN, an individual,</p> <p>Plaintiff,</p> <p>vs.</p> <p>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,</p> <p>Defendants.</p>
--

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

This matter comes before the Court on Plaintiff Jed Margolin's Motion for Debtor Examination and to Produce Documents, filed on June 10, 2015. On June 29, 2015, Defendant Reza Zandian filed an Opposition and a Motion for Protective Order. On July 10, 2015, Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce Documents and an Opposition to Defendant's Motion for Protective Order. On July 20, 2015, Defendant filed his Reply in Support of the Motion for Protective Order. On November 5, 2015, the Court held oral argument on the motions.

1 After considering the motions, oppositions, replies, oral argument and the papers and  
2 pleadings on file herein, for good cause appearing, the Court hereby grants the Motion for  
3 Debtor's Examination and to Produce Documents.

4 The Court finds that when Defendants' former attorney, John Peter Lee, withdrew from  
5 this matter he provided a last known address for Defendant Zandian in San Diego, California.  
6 Based upon this fact and other evidence in the record, the Court finds San Diego, California, is  
7 an appropriate location for the debtor's examination of Defendant Reza Zandian.

8 NOW, THEREFORE, **IT HEREBY IS ORDERED** as follows:

9  
10 1. That Defendant Reza Zandian is hereby ordered to appear in San Diego, California,  
11 during the month of February 2016 and answer upon oath or affirmation concerning his  
12 property at a Judgment Debtor Examination, with the specific location in San Diego to be  
13 chosen by Plaintiff; and

14 2. That Defendant Reza Zandian is hereby ordered to produce to Plaintiff's counsel on  
15 or before December 21, 2015, all of the following information and documents identifying,  
16 related to, and/or comprising the following:

17 a. Any and all information and documentation identifying real property, computers,  
18 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and  
19 all other assets that may be currently available for execution to satisfy the  
20 Judgments entered by the Court, including, but not limited to, information relating  
21 to financial accounts, monies owed to Defendant Zandian by others, etc.

22 b. Documents sufficient to show Zandian's balance sheet for each month from  
23 December 11, 2009 (the date the original complaint was filed) to the present.

24 c. Documents sufficient to show Zandian's gross revenues for each month from  
25 December 11, 2009 to the present.  
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- 1 d. Documents sufficient to show Zandian's costs and expenses for each month from  
2 December 11, 2009 to the present.
- 3 e. All tax returns filed by Zandian with any governmental body for the years 2010 to  
4 the present, including all schedules, W-2's and 1099's.
- 5 f. All of Zandian's accounting records, computerized electronic and/or printed on  
6 paper format for the years 2010 to the present.
- 7 g. All of Zandian's statements, cancelled checks and related banking documents for  
8 any bank, brokerage or other financial account at least partially controlled by  
9 Zandian, or recorded in the name of Zandian or for Zandian's benefit, from  
10 December 11, 2009 to the present.
- 11 h. All of Zandian's checkbooks, checkbook stubs and checkbook entries from  
12 December 11, 2009 to the present.
- 13 i. Documents sufficient to show the means and source of payment of Zandian's  
14 current residence and any other residence from December 11, 2009 to the present.
- 15 j. Documents sufficient to show the means and source of payment of Zandian's  
16 counsel in this matter from December 11, 2009 to the present.
- 17 k. Any settlement agreements by which another party has agreed to pay money to  
18 Zandian from December 11, 2009.
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21 DATED: This 6<sup>th</sup> day of November, 2015.

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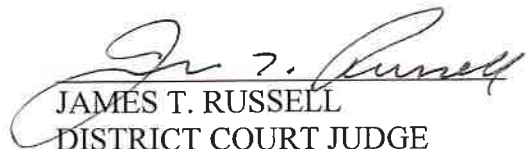
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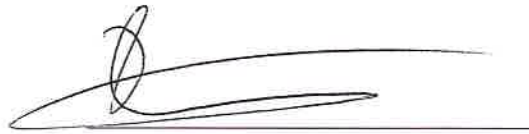
  
JAMES T. RUSSELL  
DISTRICT COURT JUDGE

1 **CERTIFICATE OF MAILING**

2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the  
3 6<sup>th</sup> day of November, 2015, I served a copy of the foregoing Order by United States Mail, postage  
4 prepaid, addressed as follows:

5 Adam P. McMillen, Esq.  
6 5371 Kietzke Lane  
7 Reno, NV 89511

8 Severin A. Carlson, Esq.  
9 Tara C. Zimmerman, Esq.  
10 510 West Fourth Street  
11 Carson City, NV 89703



11 Angela Jeffries  
12 Judicial Assistant, Dept. 1  
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1 Adam P. McMillen, Bar No. 10678  
2 [amcmillen@bhfs.com](mailto:amcmillen@bhfs.com)  
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
4 5371 Kietzke Lane,  
5 Reno, Nevada 89511  
6 Telephone: (775) 324-4100  
7 Facsimile: (775) 333-8171

8 Attorney for Plaintiff JED MARGOLIN

REC'D & FILED  
2015 NOV 12 PM 3:51  
SUSAN HERR WETHER  
BY *[Signature]* CLERK  
DEPUTY

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

11 JED MARGOLIN, an individual,  
12 Plaintiff,

13 v.

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

CASE NO.: 090C00579 1B

DEPT NO.: 1

**NOTICE OF ENTRY OF ORDER**

27 **PLEASE TAKE NOTICE** that the Order Granting Plaintiff's Motion for Debtor  
28 Examination and to Produce Documents, attached hereto as Exhibit 1, was filed in the above-  
entitled Court on November 6, 2015.

///

///

///

**AFFIRMATION**

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

DATED: November 10, 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: 

Adam P. McMillen  
5371 Kietzke Lane  
Reno, Nevada 89511  
Attorneys for Plaintiff JED MARGOLIN

BROWNSTEIN HYATT FARBER SCHRECK, LLP

5371 Kietzke Lane  
Reno, Nevada 89511  
775-324-4100

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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 10<sup>th</sup> day of November, 2015, I served the foregoing document entitled NOTICE OF ENTRY OF ORDER via first class mail, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery the following:

Severin A. Carlson  
Tara C. Zimmerman  
Kaempfer Crowell  
510 West Fourth Street  
Carson City, Nevada 89703

DATED: November 10, 2015

  
Employee of Brownstein Hyatt Farber Schreck, LLP

# Exhibit 1

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

REC'D & FILED

NOV -6 PM 3: 38

SUGAN MERRIWETHER  
CLERK

  
CLERK

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

7  
8 JED MARGOLIN, an individual,  
9 Plaintiff,

10 vs.

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

22 Defendants.

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

23 This matter comes before the Court on Plaintiff Jed Margolin's Motion for Debtor  
24 Examination and to Produce Documents, filed on June 10, 2015. On June 29, 2015, Defendant  
25 Reza Zandian filed an Opposition and a Motion for Protective Order. On July 10, 2015,  
26 Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce  
27 Documents and an Opposition to Defendant's Motion for Protective Order. On July 20, 2015,  
28 Defendant filed his Reply in Support of the Motion for Protective Order. On November 5,  
2015, the Court held oral argument on the motions.

1 After considering the motions, oppositions, replies, oral argument and the papers and  
2 pleadings on file herein, for good cause appearing, the Court hereby grants the Motion for  
3 Debtor's Examination and to Produce Documents.

4 The Court finds that when Defendants' former attorney, John Peter Lee, withdrew from  
5 this matter he provided a last known address for Defendant Zandian in San Diego, California.  
6 Based upon this fact and other evidence in the record, the Court finds San Diego, California, is  
7 an appropriate location for the debtor's examination of Defendant Reza Zandian.

8 NOW, THEREFORE, **IT HEREBY IS ORDERED** as follows:  
9

10 1. That Defendant Reza Zandian is hereby ordered to appear in San Diego, California,  
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13 chosen by Plaintiff; and

14 2. That Defendant Reza Zandian is hereby ordered to produce to Plaintiff's counsel on  
15 or before December 21, 2015, all of the following information and documents identifying,  
16 related to, and/or comprising the following:

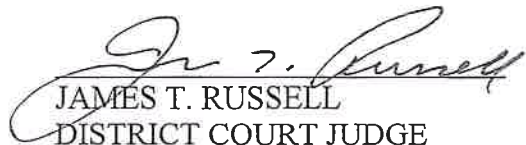
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  - f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2010 to the present.
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  - i. Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence from December 11, 2009 to the present.
  - j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter from December 11, 2009 to the present.
  - k. Any settlement agreements by which another party has agreed to pay money to Zandian from December 11, 2009.

21 DATED: This 6<sup>th</sup> day of November, 2015.

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JAMES T. RUSSELL  
DISTRICT COURT JUDGE

CERTIFICATE OF MAILING

1  
2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the  
3 <sup>6<sup>th</sup></sup> day of November, 2015, I served a copy of the foregoing Order by United States Mail, postage  
4 prepaid, addressed as follows:

5 Adam P. McMillen, Esq.  
6 5371 Kietzke Lane  
7 Reno, NV 89511

8 Severin A. Carlson, Esq.  
9 Tara C. Zimmerman, Esq.  
10 510 West Fourth Street  
11 Carson City, NV 89703



Angela Jeffries  
Judicial Assistant, Dept. 1

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

REZA ZANDIAN, A/K/A GOLAMREZA  
ZANDIANJAZI, A/K/A GHOLAM REZA  
ZANDIAN, A/K/A REZA JAZI A/K/A J. REZA  
JAZI, A/K/A G. REZA JAZI, A/K/A  
GHONOREZA ZANDIAN JAZI, AN  
INDIVIDUAL,  
Appellant,  
vs.  
JED MARGOLIN, AN INDIVIDUAL,  
Respondent.

REZA ZANDIAN A/K/A GOLAMREZA  
ZANDIANJAZI A/K/A GHOLAM REZA  
ZANDIAN A/K/A REZA JAZI A/K/A J. REZA  
JAZI A/K/A G. REZA JAZI A/K/A  
GHOLAMREZA ZANDIAN JAZI, AN  
INDIVIDUAL,  
Appellants,  
vs.  
JED MARGOLIN, AN INDIVIDUAL,  
Respondent.

**Supreme Court No. 65205/65960**  
District Court Case No. 09OC005791B

REC'D & FILED  
2015 NOV 16 PM 2:25  
SUSAN MERRIWETHER, CLERK  
CLERK OF COURT  
CLERK OF COURT  
CLERK OF COURT

**REMITTITUR**

TO: Susan Merriwether, Carson City Clerk /

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

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

DATE: November 13, 2015

Tracie Lindeman, Clerk of Court

By: Joan Hendricks  
Deputy Clerk

cc (without enclosures):

Hon. James Todd Russell, District Judge  
Kaempfer Crowell/Carson City  
Watson Rounds  
Kaempfer Crowell/Reno

### RECEIPT FOR REMITTITUR

Received of Tracie Lindeman, Clerk of the Supreme Court of the State of Nevada, the  
REMITTITUR issued in the above-entitled cause, on November 16, 2015  
**C. GRIBBLE**

\_\_\_\_\_  
District Court Clerk

REC'D & FILED  
NOV 16 PM 2:25  
IN THE SUPREME COURT OF THE STATE OF NEVADA

SUSAN MERRITT  
REZA ZANDIAN, A/K/A GOLAMREZA  
ZANDIANJAZI, A/K/A GHOLAM REZA  
ZANDIAN, A/K/A REZA JAZI A/K/A J.  
REZA JAZI, A/K/A G. REZA JAZI, A/K/A  
GHONOREZA ZANDIAN JAZI, AN  
INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,  
Respondent.

REZA ZANDIAN A/K/A GOLAMREZA  
ZANDIANJAZI A/K/A GHOLAM REZA  
ZANDIAN A/K/A REZA JAZI A/K/A J.  
REZA JAZI A/K/A G. REZA JAZI A/K/A  
GHOLAMREZA ZANDIAN JAZI, AN  
INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,  
Respondent.

No. 65205

FILED

OCT 19 2015

TRACIE K. LINDEMAN  
CLERK OF SUPREME COURT  
BY *S. Young*  
DEPUTY CLERK

No. 65960

*ORDER OF AFFIRMANCE*

These are appeals from district court post-judgment orders denying an NRCP 60(b) motion and awarding attorney fees and costs in a deceptive trade practice action. First Judicial District Court, Carson City; James Todd Russell, Judge.

Appellant's general denial was stricken by the district court as a sanction for failure to respond to discovery requests. A default judgment was thereafter entered against appellant and attorney fees and costs were awarded to respondent. Over five months after the entry of the default judgment, appellant filed an NRCP 60(b) motion seeking to set aside the

default judgment, which was denied by the district court. These appeals followed.<sup>1</sup>

The district court has broad discretion in deciding whether to grant or deny an NRCP 60(b) motion to set aside a judgment, and this court will not disturb that decision absent an abuse of discretion. *Cook v. Cook*, 112 Nev. 179, 181-82, 912 P.2d 264, 265 (1996); *see also NC-DSH, Inc. v. Garner*, 125 Nev. 647, 657-58, 218 P.3d 853, 861 (2009) (specifying that this court reviews a district court's denial of NRCP 60(b) relief for an abuse of discretion). Having reviewed the parties' briefs and appendices, we perceive no abuse of discretion in the district court's denial of appellant's NRCP 60(b) motion. The district court found that appellant failed to promptly move to set aside the default judgment, he did not show that he lacked intent to delay by failing to respond to the discovery requests and motions in the case, and he demonstrated inexcusable neglect by willfully failing to respond to or participate in the action. *See Kahne v. Orme*, 108 Nev. 510, 513-516, 835 P.2d 790, 792-94 (1992) (setting forth the factors a district court must consider in deciding an NRCP 60(b) motion), *overruled in part by Epstein v. Epstein*, 114 Nev. 1401, 950 P.2d 771 (1997). Accordingly, we affirm the district court's denial of appellant's NRCP 60(b) motion.

We further conclude that the district court did not abuse its discretion in awarding attorney fees and costs to respondent. Although NRS 598.0999(2) addresses public causes of action, NRS 41.600 provides for a private cause of action for deceptive trade practices under NRS

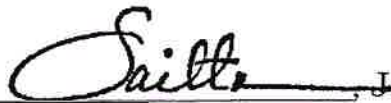
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<sup>1</sup>We elect to consolidate these appeals for disposition. *See* NRAP 3(b).



598.0915 to NRS 598.0925 and mandates the award of attorney fees and costs to the claimant if they are the prevailing party. We further conclude that the district court did not abuse its discretion in finding respondent's counsel's hourly rate reasonable. *See Gunderson v. D.R. Horton, Inc.*, 130 Nev., Adv. Op. 9, 319 P.3d 606, 615 (2014) (stating that this court reviews an award or denial of attorney fees and costs for an abuse of discretion); *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 349-50; 455 P.2d 31, 33 (1969). Accordingly, we perceive no abuse of discretion in the district court's decision and affirm its award of attorney fees and costs.

It is so ORDERED.

 J.

Saitta

 J.

Gibbons

 J.

Pickering

cc: Hon. James Todd Russell, District Judge  
David Wasick, Settlement Judge  
Kaempfer Crowell/Carson City  
Kaempfer Crowell/Reno  
Watson Rounds  
Carson City Clerk

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

REZA ZANDIAN, A/K/A GOLAMREZA  
ZANDIANJAZI, A/K/A GHOLAM REZA  
ZANDIAN, A/K/A REZA JAZI A/K/A J. REZA  
JAZI, A/K/A G. REZA JAZI, A/K/A  
GHONOREZA ZANDIAN JAZI, AN  
INDIVIDUAL,  
Appellant,  
vs.  
JED MARGOLIN, AN INDIVIDUAL,  
Respondent.

**Supreme Court No. 65205/65960**  
District Court Case No. 09OC005791B

BY:   
SUSAN M. GIBSON, CLERK  
2015 NOV 16 PM 2:25  
REC'D & FILED

REZA ZANDIAN A/K/A GOLAMREZA  
ZANDIANJAZI A/K/A GHOLAM REZA  
ZANDIAN A/K/A REZA JAZI A/K/A J. REZA  
JAZI A/K/A G. REZA JAZI A/K/A  
GHOLAMREZA ZANDIAN JAZI, AN  
INDIVIDUAL,  
Appellants,  
vs.  
JED MARGOLIN, AN INDIVIDUAL,  
Respondent.

**CLERK'S CERTIFICATE**

STATE OF NEVADA, ss.

I, Tracie Lindeman, the duly appointed and qualified Clerk of the Supreme Court of the State of Nevada, do hereby certify that the following is a full, true and correct copy of the Judgment in this matter.

**JUDGMENT**

The court being fully advised in the premises and the law, it is now ordered, adjudged and decreed, as follows:

“We perceive no abuse of discretion in this district court's decision and affirm its award of attorney fees and costs.”

Judgment, as quoted above, entered this 19<sup>th</sup> day of October, 2015.

IN WITNESS WHEREOF, I have subscribed  
my name and affixed the seal of the Supreme  
Court at my Office in Carson City, Nevada this  
November 13, 2015.

Tracie Lindeman, Supreme Court Clerk

By: Joan Hendricks  
Deputy Clerk