

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 XIII

REZA ZANDIAN
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APPELLANT IN PROPER PERSON

ATTORNEYS FOR RESPONDENT

THE SUPREME COURT OF THE STATE OF NEVADA

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9 REZA JAZI aka
J. REZA JAZI aka
10 G. REZA JAZI aka
GHONONREZA ZANDIAN JAZI
11

12 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

13 IN AND FOR CARSON CITY

14 JED MARGOLIN, an individual,

15 Plaintiff,

16 vs.

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

23 Defendants.
24

Case No. 090C00579 1B

Dept. No. 1

NOTICE OF APPEAL

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 **NOTICE OF APPEAL**

2 Please take notice that Defendant Reza Zandian appeals to the Supreme Court of Nevada
3 from "Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents,"
4 notice of entry of which was served by mail on November 10, 2015 (Exhibit A).

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

7 DATED this 10th day of December, 2015.

8 KAEMPFER CROWELL


9
10 BY: 

11 SEVERIN A. CARLSON
12 Nevada Bar No. 9373
13 TARA C. ZIMMERMAN
14 Nevada Bar No. 12146
15 510 West Fourth Street
16 Carson City, Nevada 89703
17 **Attorneys for Defendant**
18 **REZA ZANDIAN aka**
19 **GOLAMREZA ZANDIANJAZI aka**
20 **GHOLAM REZA ZANDIAN aka**
21 **REZA JAZI aka**
22 **J. REZA JAZI aka**
23 **G. REZA JAZI aka**
24 **GHONONREZA ZANDIAN JAZI**

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 10th day of December, 2015, I caused the
3 foregoing **NOTICE OF APPEAL** to be served by depositing a true copy of the same for mailing
4 at Reno, Nevada, first class postage fully prepaid and addressed to the following:

5 Matthew D. Francis, Esq.
6 Adam P. McMillen, Esq.
7 Watson Rounds
8 5371 Kietzke Lane
9 Reno, Nevada 89511
10 775.324.4100
11 775.333.8171 - facsimile
12 **Attorneys for Plaintiff**

13 
14 _____
15 an employee of Kaempfer Crowell

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SUSAN MERRINWETHER
CLERK

BY [Signature] DEPUTY

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10 G. REZA JAZI aka
GHONONREZA ZANDIAN JAZI
11

12 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
13 IN AND FOR CARSON CITY

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

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

CASE APPEAL STATEMENT

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

22 Defendants.
23

24 //././

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 CASE APPEAL STATEMENT

2 Pursuant to NRAP 3(f), Defendant REZA ZANDIAN aka GOLAMREZA
3 ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G.
4 REZA JAZI aka GHONONREZA ZANDIAN JAZI (“Defendant”), hereby provides the
5 following *Case Appeal Statement*:

6 1. Name of appellant filing this case appeal statement (NRAP 3(f)(3)(C)): Reza
7 Zandian.

8 2. Identify the judge issuing the decision, judgment, or order appealed from
9 (NRAP 3(f)(3)(B)): The Honorable James T. Russell, District Judge, First Judicial District Court
10 of the State of Nevada in and for Carson City, Department I.

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

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

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

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

23 //././

24 //././

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

3 (a) Matthew D. Francis
4 Adam P. McMillen
5 WATSON ROUNDS
6 5371 Kietzke Lane
7 Reno, Nevada 89511
8 (775) 324-4100
9 *Counsel for Respondent JED MARGOLIN*

10 (b) Severin A. Carlson
11 Tara C. Zimmerman
12 KAEMPFER CROWELL
13 510 West Fourth Street
14 Carson City, Nevada 89703
15 (775) 884-8300
16 *Counsel for Appellant REZA ZANDIAN¹*

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

20 **7. Indicate whether appellant is represented by appointed or retained counsel**
21 **on appeal (NRAP 3(f)(3)(F)):** Appellant is represented by retained counsel on appeal.²

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

24 Appellant was not granted leave to proceed in forma pauperis.

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

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

///

///

¹ Counsel is seeking to withdraw based on SCR 46, FJDCR 22 and NRPC 1.16(b)(4) and (5).

1 **10. District court case number and caption showing the names of all parties to**
2 **the proceedings below, but the use of et al. to denote parties is prohibited (NRAP**

3 **3(f)(3)(A):**

4 (a) Case number: First Judicial District Court Case Number: 09 OC 00579 1B
5 Department Number: I

6 (b) Caption:

7 JED MARGOLIN, an individual,

8 Plaintiff,

9 vs.

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

16 Defendants.

17 **11. Whether any of respondents' attorneys are not licensed to practice law in**
18 **Nevada and, if so, whether the district court granted that attorney permission to appear**
19 **under SCR 42, including a copy of any district court order granting that permission**

20 **(NRAP 3(f)(3)(E)):** Based upon information and belief, all attorneys for respondents are
21 licensed to practice law in Nevada.

22 **12. Brief description of the nature of the action and result in district court,**
23 **including the type of judgment or order being appealed and the relief granted by the**
24 **district court (NRAP 3(f)(3)(I)):** The subject matter of this case concerns various patents and a

dispute over their ownership. Plaintiff claims to be the owner of the patents at issue. Plaintiff
claims that certain conduct and actions of Optima Technology Corporation, a California

² Counsel is seeking to withdraw based on SCR 46, FJDCR 22 and NRPC 1.16(b)(4) and (5).

1 corporation, Optima Technology Corporation, a Nevada corporation, (together these corporations
2 are referred to hereinafter as the “Corporate Defendants”) and Reza Zandian (“Zandian”)
3 (collectively the Corporate Defendants and Zandian are referred to as the “Defendants”)
4 disrupted his ownership and control over the patents, thereby causing him damages.

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

9 On December 20, 2013, Zandian filed a Motion to Set Aside Default Judgment with the
10 District Court. Plaintiff filed a response, and Zandian replied. No hearing was held on the
11 Motion to Set Aside. On February 6, 2014, the District Court entered its Order Denying
12 Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi
13 aka J. Reza Jazi aka G. Reza Jazi aka Ghonoreza Zandian Jazi’s Motion to Set Aside Default
14 Judgment. The District Court’s Order Denying Defendant Reza Zandian aka Golamreza
15 Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka
16 Ghonoreza Zandian Jazi’s Motion to Set Aside Default Judgment was affirmed on appeal by this
17 Court in consolidated docket number 65950 on October 15, 2015.

18 Plaintiff has been pursuing post-judgment enforcement remedies against Zandian. On or
19 about June 10, 2015, Plaintiff filed a Motion for Debtor Examination and to Produce Documents.
20 On June 29, 2015, Zandian filed an Opposition and a Motion for Protective Order. On July 10,
21 2015, Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce
22 Documents and an Opposition to Defendant’s Motion for Protective Order. On July 20, 2015,
23 Zandian filed his Reply in Support of the Motion for Protective Order. On November 5, 2015,
24 the District Court held oral argument on the motions. Thereafter, on or about November 6, 2015,

1 the Court entered its Order Granting Plaintiff's Motion for Debtor Examination and to Produce
2 Documents ("Order"). Notice of Entry of such Order was served upon Zandian via US mail on
3 November 10, 2015.

4 In its Order, the District Court rejected evidence that Zandian was a resident of France,
5 and thus could not be made to appear for a judgment debtor examination outside of France
6 pursuant to NRS 21.271 (1)(b). Instead, relying on Zandian's last known address on file with the
7 District Court, as provided by Zandian's former counsel, John Peter Lee, when he withdrew from
8 the case on or about March 2012, the District Court found that San Diego, California was an
9 appropriate place for the conducting of the debtor examination. The District Court ordered that
10 Zandian appear for a debtor examination in San Diego, California during the month of February
11 2016, as well as produce documents and information to Plaintiff's counsel on or before
12 December 21, 2015.

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

- 16 • Nevada Supreme Court docket number 65205:

17 REZA ZANDIAN A/K/A GOLAMREZA ZANDIANJAZI A/K/A GHOLAM
18 REZA ZANDIAN A/K/A REZA JAZI A/K/A J. REZA JAZI A/K/A G. REZA
19 JAZI A/K/A GHONOREZA ZANDIAN JAZI, AN INDIVIDUAL,

20 Appellant,

21 vs.

22 JED MARGOLIN, AN INDIVIDUAL,

23 Respondent.

24 //././

//././

- Nevada Supreme Court docket number 65960:

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.

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

The appeal does not involve child custody or visitation.

15. In civil cases, whether the appeal involves the possibility of settlement (NRAP

3(f)(3)(L)): The appeal involves the possibility of settlement.

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

DATED this 10th day of December, 2015.

KAEMPFER CROWELL

BY: 

SEVERIN A. CARLSON

Nevada Bar No. 9373

TARA C. ZIMMERMAN

Nevada Bar No. 12146

510 West Fourth Street

Carson City, Nevada 89703

Attorneys for Defendant REZA ZANDIAN

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 10th day of December, 2015, I caused the
3 foregoing **CASE APPEAL STATEMENT** to be served this date by depositing a true copy of
4 the same for mailing at Reno, Nevada, first class postage fully prepaid and addressed to the
5 following:

6 Matthew D. Francis, Esq.
7 Adam P. McMillen, Esq.
8 Watson Rounds
9 5371 Kietzke Lane
10 Reno, Nevada 89511
11 775.324.4100
12 775.333.8171 - facsimile
13 **Attorneys for Plaintiff**

14 
15 an employee of Kaempfer Crowell

REC'D & FILED

2015 DEC 10 PM 2:43

SUSAN MERRIWETHER
CLERK

BY  DEPUTY

FIRST JUDICIAL DISTRICT COURT
885 EAST MUSSER ST SUITE 3031

Receipt Number 42307

Receipt Date 12/10/2015

Case Number 09 OC 00579 1B

Description MARGOLIN, JED VS. OPTIMA TECHNOLOGY CORPORATION et al

Received From KAEMPFER CROWELL

Total Received	500.00
Net Received	500.00
Change	0.00

Receipt Payments	Amount	Reference	Description
CHECK	500.00	11322	

Receipt Applications	Amount
HOLDING	500.00

Balance Due 0.00


Comments:

Deputy Clerk: 1BCCOOPER Transaction Date 12/10/2015
14:42:31.27

ORIGINAL

REC'D & FILED

2015 DEC 10 PM 2:43

SUSAN MERRIWEATHER
CLERK
BY  DEPUTY

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 aka
8 GOLAMREZA ZANDIANJAZI aka
GHOLAM REZA ZANDIAN aka
9 REZA JAZI aka
J. REZA JAZI aka
10 G. REZA JAZI aka
GHONONREZA ZANDIAN JAZI
11

12 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

13 IN AND FOR CARSON CITY

14 JED MARGOLIN, an individual,

Case No. 090C00579 1B

Dept. No. 1

15 Plaintiff,

16 vs.

**MOTION TO WITHDRAW AS
COUNSEL**

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

22 Defendants.
23

24 //././

KAEMPFER CROWELL
510 West Fourth Street,
Carson City, Nevada 89703

1 **MOTION TO WITHDRAW AS COUNSEL**

2 Severin A. Carlson, Tara C. Zimmerman and Kaempfer Crowell (collectively "Counsel"),
3 counsel for Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM
4 REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA
5 ZANDIAN JAZI ("Defendant"), pursuant to Supreme Court Rule ("SCR") 46, First Judicial
6 District Court Rule ("FJDCR") 22, and Nevada Rule of Professional Conduct ("NRPC") 1.16,
7 move this Court for an order granting Counsel's motion to withdraw as counsel of record in this
8 matter.

9 This motion is made based upon the following Points and Authorities and the Affidavit of
10 Severin A. Carlson, attached hereto as **Exhibit 1**.

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 **I. FACTUAL BACKGROUND**

13 Kaempfer Crowell entered an appearance on behalf of Defendant on or about March 3,
14 2014, to, among other things; seek to set aside orders of this Court that had been entered against
15 Defendant, directly and via appeals to the Nevada Supreme Court.

16 Most recently, this Court, in its November 6, 2015 Order Granting Plaintiff's Motion for
17 Debtor Examination and to Produce Documents (the "November 6 Order"), ordered Defendant
18 to produce to Plaintiff's counsel on or before December 21, 2015, various information and
19 documents as set forth in the November 6 Order. The November 6 Order also directed Defendant
20 to appear for a Judgment Debtor Examination at a location to be specified by Plaintiff's counsel
21 in San Diego, California in February 2016.

22 //././

23 //././

24 //././

1 During Counsel's representation, Defendant has substantially failed to fulfill his
2 obligations to Kaempfer Crowell regarding its services, despite Kaempfer Crowell having given
3 Defendant reasonable warning that it would withdraw as counsel unless the obligations are
4 fulfilled. Further representation would result in an unreasonable financial burden on the assigned
5 lawyers and law firm. The representation has also been rendered unreasonably difficult as a
6 result of Defendant's failure to meet his obligations to Counsel.

7 Furthermore, Defendant insists upon taking action that the lawyer considers repugnant or
8 with which the lawyer has fundamental disagreement, therefore making the immediate request to
9 withdraw reasonable.

10 **II. ANALYSIS**

11 Rule 1.16(b)(5) of the Nevada Rules of Professional Conduct provides that an attorney
12 may withdraw from representing a client if "[t]he client fails substantially to fulfill an obligation
13 to the lawyer regarding the lawyer's services and has been given a reasonable warning that the
14 lawyer will withdraw unless the obligation is fulfilled."

15 Rule 1.16(b)(4) of the Nevada Rules of Professional Conduct provides that an attorney
16 may withdraw from representing a client if "[a] client insists upon taking action that the lawyer
17 considers to be repugnant or with which the lawyer has a fundamental disagreement."

18 In this case, Defendant has not only substantially failed to fulfill his obligations to
19 Kaempfer Crowell regarding its services, but also insists upon taking action that the lawyer
20 considers to be repugnant or with which the lawyer has a fundamental disagreement.
21 Consequently, Counsel hereby requests that the Court issue an order allowing withdrawal as
22 Defendant's counsel.

23 Furthermore, SCR 46 provides:

24 /./././

1 The attorney in an action or special proceeding may be changed at any time
2 before judgment or final determination as follows:

3 (2) Upon the order of the court of judge thereof on the application of the
4 attorney or the client.

5 Consistent with SCR 46, FJDCR 22 provides in civil cases that “An attorney of record
6 shall be deemed such in all subsequent related proceedings before the court until such time as a
7 withdrawal of counsel is made pursuant to SCR 46 and 166.”

8 As set forth in the attached Affidavit of Severin A. Carlson, and based upon information
9 and belief, the last known addresses of Defendant are as follows:

10 Reza Zandian
11 9 MacArthur Place, Unit 2105
12 Santa Ana, California 92707-6753

13 Gholam Reza Zandian Jazi
14 6 rue Edouard Fournier
15 75116 Paris
16 France
17 rezazand@hotmail.com

18 This Motion will be served upon Defendant.

19 Counsel has complied with all requirements to withdraw as counsel of record. As such, an
20 order allowing Counsel to withdraw is appropriate. Defendant has been provided a copy of the
21 Court’s November 6 Order, after having been informed of the Court’s ruling from the bench, and
22 therefore is readily aware of the deadlines and requirements set forth in the November 6 Order.

23 **CONCLUSION**

24 For the reasons stated above, Counsel requests an order of this Court allowing them to
withdraw as counsel of record in this action.

///.
///.

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

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

DATED this 10th day of December, 2015.

KAEMPFER CROWELL

BY: 

SEVERIN A. CARLSON
Nevada Bar No. 9373
TARA C. ZIMMERMAN
Nevada Bar No. 12146
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Defendants

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 10th day of December, 2015, I caused the
3 foregoing **MOTION TO WITHDRAW AS COUNSEL** to be served this date by depositing a
4 true copy of the same for mailing at Reno, Nevada, first class postage fully prepaid and
5 addressed to the following:

6 Matthew D. Francis, Esq.
7 Adam P. McMillen, Esq.
8 Watson Rounds
9 5371 Kietzke Lane
10 Reno, Nevada 89511
11 775.324.4100
12 775.333.8171 - facsimile
13 **Attorneys for Plaintiff**

14 Reza Zandian
15 9 MacArthur Place, Unit 2105
16 Santa Ana, California 92707-6753
17 **Defendant**

18 Gholam Reza Zandian Jazi
19 6 rue Edouard Fournier
20 75116 Paris
21 France
22 **Defendant**

23 I also caused the foregoing Motion to be served this date by e-mail to Defendant as
24 follows:
rezazand@hotmail.com


an employee of Kaempfer Crowell

EXHIBIT 1

EXHIBIT 1

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

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

AFFIDAVIT OF SEVERIN A. CARLSON
IN SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL FOR
DEFENDANT REZA ZANDIAN

21 //././
22 //././
23 //././
24 //././

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 **AFFIDAVIT OF SEVERIN A. CARLSON IN SUPPORT OF**
2 **MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT REZA ZANDIAN**

3 STATE OF NEVADA)
4) ss.
5 COUNTY OF WASHOE)

6 1. I am duly licensed to practice law in the State of Nevada and am a partner at the
7 law firm of Kaempfer Crowell, as well as counsel for Defendant REZA ZANDIAN
8 (“Defendant”) in the above-entitled matter. I have personal knowledge of the facts stated herein,
9 except for those stated upon information and belief and, as to those, I believe them to be true.

10 2. I make this Affidavit in support of Kaempfer Crowell’s Motion to Withdraw as
11 Counsel for Defendant.

12 3. Continued representation will result in an unreasonable financial burden on
13 Kaempfer Crowell and the representation has been rendered unreasonably difficult.

14 4. Defendant has been repeated advised of his obligations to Kaempfer Crowell and
15 that failure to meet those obligations could result in Kaempfer Crowell withdrawing as counsel
16 of record.

17 5. Defendant continues to have a substantial obligation owed to Kaempfer Crowell
18 that remains unrectified.

19 6. Despite repeated attempts to counsel Defendant, Defendant insists upon taking
20 action that Kaempfer Crowell and I consider to be repugnant or with which Kaempfer Crowell
21 and I have a fundamental disagreement.

22 7. Defendant’s current mailing address on file with this office, as well as all other
23 known possible addresses are:

24 //././

//././

1 Gholam Reza Zandian Jazi
2 6 rue Edouard Fournier
3 75116 Paris
4 France

5 Reza Zandian
6 9 MacArthur Place, Unit 2105
7 Santa Ana, California 92707-6753

8 rezazand@hotmail.com

9 8. That in the light of the above, I believe an order allowing Kaempfer Crowell to
10 withdraw from representation in this matter is appropriate and that such withdrawal complies
11 with the applicable rules of professional conduct, Nevada Supreme Court Rules, and local rules
12 of practice before the First Judicial District Court.

13 FURTHER YOUR AFFIANT SAYETH NAUGHT.

14 DATED this 10th day of December, 2015.

15 
16 SEVERIN A. CARLSON

17 Subscribed and Sworn to before me
18 this 10th day of December, 2015, by
19 Severin A. Carlson.

20 
21 NOTARY PUBLIC

22 My Commission Expires:
23 10-15-2018



1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 15th day of December, 2015, I caused the
3 foregoing **ERRATA TO MOTION TO WITHDRAW AS COUNSEL** to be served this date
4 by depositing a true copy of the same for mailing at Reno, Nevada, first class postage fully
5 prepaid and addressed to the following:


6 Matthew D. Francis, Esq.
7 Adam P. McMillen, Esq.
8 Watson Rounds
9 5371 Kietzke Lane
10 Reno, Nevada 89511
11 775.324.4100
12 775.333.8171 - facsimile
13 **Attorneys for Plaintiff**

14 Reza Zandian
15 c/o Alborz Zandian
16 9 MacArthur Place, Unit 2105
17 Santa Ana, California 92707-6753
18 **Defendant**

19 Gholam Reza Zandian Jazi
20 6 rue Edouard Fournier
21 75116 Paris
22 France
23 **Defendant**

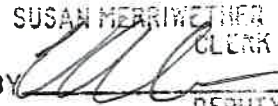
24 I also caused the foregoing Errata to be served this date by e-mail to Defendant as follows:

rezazand@hotmail.com


an employee of Kaempfer Crowell

1 Adam P. McMillen, Bar No. 10678
2 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 DEC 28 PM 3:20
SUSAN MERRIWETHER
CLERK
BY  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

**OPPOSITION TO MOTION TO
WITHDRAW AS COUNSEL**

21 COMES NOW Plaintiff, Jed Margolin, by and through undersigned counsel of record,
22 Adam P. McMillen of Brownstein Hyatt Farber Schreck, and files this opposition to Severin A.
23 Carlson, Tara C. Zimmerman and Kaempfer Crowell's Motion to Withdraw as Counsel for
24 Defendant Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi
25 aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi ("Zandian").
26

27 This opposition is made and based upon the following points and authorities, the papers
28 and pleadings on file herein and any other information or oral argument the Court entertains.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Facts**

3 On March 14, 2012, John Peter Lee filed an amended motion to withdraw as counsel for
4 Zandian and provided the Court and counsel with Zandian's last known address in San Diego.

5 On April 26, 2012, the Court granted John Peter Lee's motion to withdraw.

6
7 Thereafter, Zandian failed to respond to discovery or any other papers or pleadings in this
8 matter. As a result, on June 24, 2013, a default judgment was entered against Zandian. On
9 December 20, 2012, Zandian filed a motion to set aside the default judgment and a notice of
10 appearance of new counsel (Johnathon Fayeghi, Esq., of the law firm Hawkins Melendrez P.C.).

11 On February 6, 2014, the Court denied the motion to set aside the default judgment.

12 On February 2, 2014, Plaintiff Jed Margolin filed a motion for order to show cause
13 regarding contempt for Zandian's willful violation of the Court's January 13, 2014 Order granting
14 Plaintiff's motion for debtor examination and to produce documents. On February 21, 2014,
15 Zandian filed a substitution of counsel, substituting in the law firm Kaempfer Crowell for
16 Hawkins Melendrez. On March 12, 2014, Zandian filed a notice of appeal regarding the Court's
17 order denying the motion to set aside the default judgment. On March 17, 2014, the Court filed
18 an order denying the request for submission of the motion for order to show cause and stated that
19 the Court was divested of jurisdiction due to Zandian filing a notice of appeal regarding this
20 Court's order related to the default judgment.
21

22 On June 10, 2015, Plaintiff filed another motion for debtor's examination and to produce
23 documents. On October 19, 2015, the Supreme Court affirmed this Court's orders regarding the
24 default judgment. On November 6, 2015, after a hearing on the matter, the Court granted the
25 motion for debtor's examination and to produce documents. In the November 6, 2015 order, the
26 Court ordered Zandian to appear in San Diego, California, for a debtor's examination during the
27
28

1 month of February, 2016. The Court also ordered Zandian to produce documents regarding
2 Zandian’s financial information on or before December 21, 2015.

3 On December 10, 2015, Zandian’s counsel filed the current motion to withdraw as
4 counsel. Counsel provides two reasons for the motion to withdraw. The first stated reason is that
5 Zandian has substantially failed to fulfill his obligations to his counsel and further representation
6 would be a financial burden on counsel. See Motion to Withdraw at 3:1-6. The second stated
7 reason is that Zandian “insists upon taking action that the lawyer considers repugnant or with
8 which the lawyer has fundamental disagreement.” See *id.* at 3:7-9. There is no explanation as to
9 what action counsel considers repugnant or with which he has a fundamental disagreement.
10

11 Counsel also provided two last known addresses of Zandian: one in Paris, France, and one
12 in Santa Ana, California. See *id.* at 4:9-14. The Santa Ana address was associated with “Reza
13 Zandian” and the French address was associated with “Gholam Reza Zandian Jazi.” See *id.*
14

15 Also on December 10, 2015, Zandian filed a notice of appeal of the order granting
16 Plaintiff’s motion for debtor examination and to produce documents.

17 On December 15, 2015, Zandian’s counsel filed an errata to their motion to withdraw
18 stating that Zandian “resides in France” and indicated that the Santa Ana, California, address
19 belongs to Reza Zandian’s son, Alborz Zandian.
20

21 On December 16, 2015, Zandian’s counsel filed a motion to withdraw as counsel for
22 “Appellant Reza Zandian” in the Nevada Supreme Court. See Exhibit 1. The reasons given for
23 that motion to withdraw are that Zandian has failed to fulfill his obligations and that further
24 representation would result in an unreasonable financial burden on counsel. *Id.* In addition,
25 counsel represents that Zandian insists on taking action that his counsel “considers repugnant or
26 with which counsel has fundamental disagreement.” *Id.* Further, counsel represents that when
27 Zandian was informed of the November 6, 2015, order regarding the debtor’s examination and to
28

1 produce documents, Zandian “advised Carlson that he wished to pursue the instant appeal of the
2 November 6 Order.” Id. Counsel then states that he agreed to file the appeal “solely for the
3 purpose of preserving Appellant’s appeal.” Id. As in the present motion to withdraw, counsel
4 fails to explain what it is that counsel finds repugnant or with which counsel has a fundamental
5 disagreement.

6 **II. Legal standard**

7
8 “While a party may discharge his attorney with or without cause, *Morse v. District Court*,
9 65 Nev. 275, 195 P.2d 199 (1948), with few limitations, the attorney should not withdraw from a
10 case except for good cause.” *Matter of Kaufman*, 93 Nev. 452, 456, 567 P.2d 957, 959-60 (1977)
11 (citing *Page v. Walser*, 46 Nev. 390, 213 P. 107 (1923); *Eisenberg v. Brand, et al.*, 144 Misc.
12 878, 259 N.Y.S. 57 (1932)). “Except for good cause shown, no application for withdrawal or
13 substitution shall be granted if a delay of the trial or of the hearing or any other matter in the case
14 would result. Discharge of an attorney may not be grounds to delay a trial or other hearing.”
15 FJDCR 22(4) (emphasis added). “When ordered to do so by a tribunal, a lawyer shall continue
16 representation notwithstanding good cause for terminating the representation.” NRPC 1.16(c)
17 (emphasis added).
18

19 **III. Allowing counsel to withdraw will delay the production of documents and the** 20 **debtor’s examination that were ordered by this Court on November 6, 2015.**

21
22 Notwithstanding any potential good cause, allowing counsel to withdraw will delay the
23 debtor’s examination and the production of documents that were ordered by this Court on
24 November 6, 2015. The documents were ordered to be produced on or before December 21,
25 2015. The debtor’s examination was ordered to take place in February, 2016. The motion to
26 withdraw comes immediately before the deadline to produce documents and shortly before the
27 debtor’s examination. If counsel is allowed to withdraw now, these items will be unnecessarily
28

1 delayed and Plaintiff will be highly prejudiced thereby. In addition, a delay in these proceedings
2 will give Zandian time to hide or dispose of assets.

3 **IV. Zandian’s last two addresses appear to be unreliable**

4 At the core of Zandian’s appeal of this Court’s denial of the Motion to Set Aside the
5 Default Judgment was his counsel’s (Kaempfer Crowell’s) assertion that it was not reasonable for
6 Plaintiff or the Court to rely on the address that John Peter Lee (Zandian’s first Counsel) provided
7 when he withdrew. Now counsel is leaving two addresses for Zandian in its motion to withdraw,
8 one in France and one in Santa Ana, California. Counsel provided a different alias for Zandian
9 for each address as well. Counsel also indicates that Zandian resides in France and that the Santa
10 Ana address is for Zandian’s son, Alborz. Another problem is that Zandian’s French residency
11 permit expired on August 5, 2015. See Exhibit 2 (“Est autorise(e) a prolonger provisoirement son
12 sejour en france jusqu' au 05/08/2015” which translates to English as, “Is authorized to
13 temporarily extend his stay in France until 05/08/2015”). Therefore, it appears that the addresses
14 that counsel has provided are unreliable and would not allow Plaintiff and the Court to provide
15 notice to Zandian of the proceedings herein. This unreliability provides another basis for not
16 allowing counsel to withdraw.

17
18
19 In addition, according to FJDCR 22(3), if an attorney withdraws, the attorney must
20 provide an “address at which the party is to be served with notice of all further proceedings.”
21 Also, SCR 47, when an attorney withdraws another attorney must be appointed or the party must
22 appear in person. Given the unreliability of the addresses provided to the Court and given
23 Zandian’s history with this case, it would appear that if counsel is permitted to withdraw, Zandian
24 will ignore this matter and execution of the judgment will be delayed and Plaintiff will be greatly
25 prejudiced thereby and Zandian will make a mockery of this Court and its orders.

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V. Counsel has not established good cause

Counsel has not explained how Zandian has failed to fulfill his obligations or what action Zandian wants to take or that he might have already taken that counsel finds repugnant or with which counsel has a fundamental disagreement. Counsel should be compelled to disclose the actual reasons for the motion to withdraw so that the Court can properly weigh the evidence to determine the propriety of withdrawal. Without providing the basis therefore, there cannot be good cause to withdraw.

VI. Conclusion

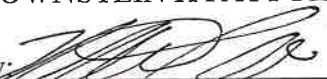
Based upon the above, counsel's motion to withdraw should be denied. If the Court is in any way inclined to grant the motion, Plaintiff requests an order from the Court requiring Zandian to confirm an address, before any withdrawal, whereby Plaintiff and the Court can communicate regarding this matter with Zandian.

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED: December 28 2015.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By:  6972 For: _____
Adam P. McMillen
5371 Kietzke Lane
Reno, Nevada 89511
Attorneys for Plaintiff JED MARGOLIN

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 28th day of December, 2015, I served the foregoing document entitled **OPPOSITION TO MOTION TO WITHDRAW AS COUNSEL** 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: December 28, 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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Exhibit 1

Exhibit 1

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Dec 16 2015 08:43 a.m.

Tracie K. Lindeman
Clerk of Supreme Court

Nevada Supreme Court
Case No. 69372

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.

MOTION TO WITHDRAW AS COUNSEL
FOR APPELLANT REZA ZANDIAN

Severin A. Carlson (“Carlson”), Tara C. Zimmerman (“Zimmerman”) and Kaempfer Crowell (collectively “Counsel”), counsel for Appellant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI (“Appellant”), pursuant to Supreme Court Rule (“SCR”) 46 and Nevada Rule of Professional Conduct (“NRPC”) 1.16, move this Court for an order granting Counsel’s motion to withdraw as counsel of record in this matter.

This motion is made based upon the following Points and Authorities and the Affidavit of Severin A. Carlson, attached hereto as **Exhibit 1**.

MEMORANDUM OF POINTS AND AUTHORITIES

I. FACTUAL BACKGROUND

Kaempfer Crowell entered an appearance in the First Judicial District Court on behalf of Appellant on or about March 3, 2014, to, among other things, seek to set aside orders of the District Court that had been entered against Appellant, directly and via appeals to this Court.

The District Court, in its November 6, 2015 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents (the "November 6 Order"), attached hereto as **Exhibit 2**, ordered Appellant to produce to counsel for Respondent JED MARGOLIN ("Respondent"), on or before December 21, 2015, various information and documents as set forth in the November 6 Order. The November 6 Order also directed Appellant to appear for a judgment debtor examination at a location to be specified by Respondent's counsel in San Diego, California in February 2016.

Thereafter, Carlson advised Appellant that Counsel would be seeking to withdraw in the District Court proceedings unless Appellant's obligations were fulfilled. At that time, Appellant advised Carlson that he wished to pursue the instant appeal of the November 6 Order. Given the approaching

deadline for filing an appeal, Carlson agreed to file the Notice of Appeal and Case Appeal Statement with the First Judicial District Court on Appellant's behalf, solely for the purpose of preserving Appellant's appeal. Carlson advised Appellant that Counsel would be seeking to withdraw in both the District Court and Nevada Supreme Court proceedings immediately thereafter. Counsel filed a Motion to Withdraw as Counsel in the District Court proceedings on December 10, 2015, the same day the Notice of Appeal was filed.

During Counsel's representation, Appellant has substantially failed to fulfill his obligations to Counsel regarding their services, despite Appellant having been given reasonable warning that Counsel would withdraw unless the obligations were fulfilled. Further representation would result in an unreasonable financial burden on Counsel. The representation has also been rendered unreasonably difficult as a result of Appellant's failure to meet his obligations to Counsel.

Furthermore, Appellant insists upon taking action that Counsel considers repugnant or with which Counsel has fundamental disagreement, therefore making the immediate request to withdraw reasonable.

/. /. /. /

/. /. /. /

II. ANALYSIS

Rule 1.16(b)(5) of the Nevada Rules of Professional Conduct provides that an attorney may withdraw from representing a client if “[t]he client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given a reasonable warning that the lawyer will withdraw unless the obligation is fulfilled.”

Rule 1.16(b)(4) of the Nevada Rules of Professional Conduct provides that an attorney may withdraw from representing a client if “[a] client insists upon taking action that the lawyer considers to be repugnant or with which the lawyer has a fundamental disagreement.” Furthermore, SCR 46 provides:

The attorney in an action or special proceeding may be changed at any time before judgment or final determination as follows:

- (2) Upon the order of the court or judge thereof on the application of the attorney or the client.

In this case, Appellant has not only substantially failed to fulfill his obligations to Counsel regarding their services, but also insists upon taking action that Counsel considers to be repugnant or with which Counsel has a fundamental disagreement. Consequently, Counsel hereby request that the Court issue an order allowing withdrawal as Appellant’s counsel.

/./././

As set forth in the attached Affidavit of Severin A. Carlson, and based upon information and belief, the last known addresses of Appellant are as follows:

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753

rezazand@hotmail.com

This Motion will be served upon Appellant. No judgment or final determination has been filed in this case other than those previously ordered by the District Court and upheld by this Court.

Counsel has complied with all requirements to withdraw as counsel of record. As such, an order allowing Counsel to withdraw is appropriate. Appellant has been provided a copy of the District Court's November 6 Order, after having been informed of the District Court's ruling from the bench, and therefore is readily aware of the deadlines and requirements set forth in the November 6 Order. Appellant has also been advised of the deadlines before this Court, including this Court's assignment of this case to the Mandatory Settlement Program.

III. CONCLUSION

For the reasons stated above, Counsel request an order of this Court allowing them to withdraw as counsel of record for Appellant in this action.

DATED this 15th day of December, 2015.

KAEMPFER CROWELL

BY: 

SEVERIN A. CARLSON
Nevada Bar No. 9373
TARA C. ZIMMERMAN
Nevada Bar No. 12146
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Appellant

CERTIFICATE OF SERVICE

Pursuant to NRAP 25(d), I, the undersigned, hereby certify that on the 15th day of December, 2015, I caused the foregoing **MOTION TO WITHDRAW AS COUNSEL FOR APPELLANT REZA ZANDIAN** to be served this date by depositing a true copy of the same for mailing at Reno, Nevada, first class postage fully prepaid and addressed to:

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 Respondent

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753
Appellant

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France
Appellant

I also caused the foregoing Motion to be served this date by e-mail to Appellant as follows:
rezazand@hotmail.com


an employee of Kaempfer Crowell

EXHIBIT 1

EXHIBIT 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.

**Nevada Supreme Court
Case No. 69372**

**AFFIDAVIT OF SEVERIN A. CARLSON IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL
FOR APPELLANT REZA ZANDIAN**

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

1. I am duly licensed to practice law in the State of Nevada and am a partner at the law firm of Kaempfer Crowell, as well as counsel for Appellant REZA ZANDIAN (“Appellant”) in the above-entitled matter.

/./././

/./././

2. I have personal knowledge of the facts stated herein, except for those stated upon information and belief and, as to those, I believe them to be true.

3. I make this Affidavit in support of Kaempfer Crowell's Motion to Withdraw as Counsel for Appellant.

4. Continued representation of Appellant will result in an unreasonable financial burden on Kaempfer Crowell and the representation has been rendered unreasonably difficult.

5. Appellant has been repeatedly reminded of his obligations to Kaempfer Crowell and that failure to meet those obligations could result in Kaempfer Crowell withdrawing as counsel of record.

6. Appellant continues to have substantial outstanding obligations to Kaempfer Crowell that remain unrectified.

7. Despite repeated attempts to counsel Appellant, Appellant insists upon taking action that Kaempfer Crowell and I consider to be repugnant or with which we have a fundamental disagreement.

8. Appellant's current mailing address on file with this office, as well as all other known possible addresses are:

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753

rezazand@hotmail.com

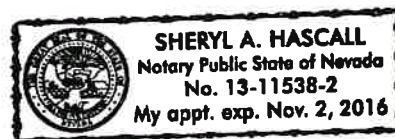
8. That in light of the above, I believe an order allowing Kaempfer Crowell to withdraw from representation in this matter is appropriate and that such withdrawal complies with the applicable rules of professional conduct, Nevada Supreme Court Rules, and Nevada Rules of Appellate Procedure.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 15th day of December, 2015.


SEVERIN A. CARLSON

Subscribed and Sworn to before me
this 15th day of December, 2015, by
Severin A. Carlson.




NOTARY PUBLIC

My Commission Expires: 11/2/2016

EXHIBIT 2

EXHIBIT 2

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Case No. 09 OC 00579 1B

Dept. No. I

REC'D & FILED
NOV -6 PM 3:38
SUSAN MERRIWETHER
CLERK

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

JED MARGOLIN, an individual,
Plaintiff,

vs.

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

**ORDER 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
18 a. Any and all information and documentation identifying real property, computers,
19 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
20 all other assets that may be currently available for execution to satisfy the
21 Judgments entered by the Court, including, but not limited to, information relating
22 to financial accounts, monies owed to Defendant Zandian by others, etc.
- 23 b. Documents sufficient to show Zandian's balance sheet for each month from
24 December 11, 2009 (the date the original complaint was filed) to the present.
- 25 c. Documents sufficient to show Zandian's gross revenues for each month from
26 December 11, 2009 to the present.
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- d. Documents sufficient to show Zandian's costs and expenses for each month from December 11, 2009 to the present.
 - e. All tax returns filed by Zandian with any governmental body for the years 2010 to the present, including all schedules, W-2's and 1099's.
 - f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2010 to the present.
 - g. All of Zandian's statements, cancelled checks and related banking documents for any bank, brokerage or other financial account at least partially controlled by Zandian, or recorded in the name of Zandian or for Zandian's benefit, from December 11, 2009 to the present.
 - h. All of Zandian's checkbooks, checkbook stubs and checkbook entries from December 11, 2009 to the present.
 - 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 6th day of November, 2015.

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JAMES T. RUSSELL
DISTRICT COURT JUDGE

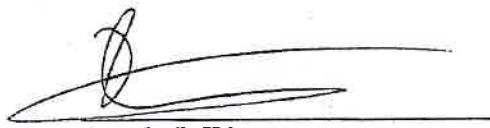
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CERTIFICATE OF MAILING

The undersigned, an employee of the First Judicial District Court, hereby certifies that on the 6th day of November, 2015, I served a copy of the foregoing Order by United States Mail, postage prepaid, addressed as follows:

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

Severin A. Carlson, Esq.
Tara C. Zimmerman, Esq.
510 West Fourth Street
Carson City, NV 89703



Angela Jeffries
Judicial Assistant, Dept. 1

Exhibit 2

Exhibit 2

RÉPUBLIQUE FRANÇAISE
AUTORISATION DE SÉJOUR

PREFECTURE
DOSSIER N° 10S1000000
ENTRÉE EN FRANCE 15/03/2012

N° 9913041653

NOM (M.) ZANDIAN JAZI
PRÉNOMS GHOLAM REZA
NÉ/ELLE 15/01/1952 A ISPAHAN
NATIONALITÉ IRANIENNE
ADRESSE 06 RUE EDOUARD FOUBERTIER
75116 PARIS

EST AUTORISÉ(E) A PROLONGER PROVISOIREMENT
SON SÉJOUR EN FRANCE JUSQU'AU: 05/08/2015

CEtte AUTORISATION N'EST VALABLE QU'ACCOMPAGNÉ DU DOCUMENT
NO H95628481 VALABLE DU 06/07/2013 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 - M 1

SIGNATURE
DU TITULAIRE

CEtte AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

FAIT A PARIS (CITR)
LE 06/05/2015
VALABLE JUSQU'AU 05/08/2015
02455778

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

5 Attorneys for Defendant
6 REZA ZANDIAN

REC'D & FILED
2015 DEC 29 PM 2:58
SUSAN H. ...
E. W. Waking

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,
vs.

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

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

18
19 **REQUEST FOR SUBMISSION**

20 Kaempfer Crowell hereby requests that its Motion to Withdraw as Counsel, filed on
21 December 10, 2015 and having gone unopposed, be submitted to the Court for decision.

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23 ///.
24 ///.

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

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Affirmation Pursuant to NRS 239B.030

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

DATED this 29 day of December, 2015.

KAEMPFER CROWELL

BY:  #1027 *fa*

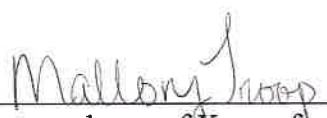
SEVERIN A. CARLSON
Nevada Bar No. 9373
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Defendant REZA ZANDIAN

CERTIFICATE OF SERVICE

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I, the undersigned, hereby certify that on the 29 day of December 2015, I caused the foregoing **REQUEST FOR SUBMISSION** to be served this date by depositing a true copy of the same for mailing at Reno, 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


an employee of Kaempfer Crowell

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

REC'D & FILED
2015 DEC 31 PM 1:05
SUSAN M...
BY *[Signature]*

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

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 aka
15 GOLAMREZA ZANDIANJAZI aka
16 GHOLAM REZA ZANDIAN aka REZA JAZI
17 aka J. REZA JAZI aka G. REZA JAZI aka
18 GHONONREZA ZANDIAN JAZI, an
19 individual; DOE COMPANIES 1-10; DOE
20 CORPORATIONS 11-20; and DOE
21 INDIVIDUALS 21-30,
22 Defendants.

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

**PROPOSED ORDER GRANTING
MOTION TO WITHDRAW AS
COUNSEL**

18 This matter comes before the Court on Kaempfer Crowell's Motion to Withdraw as
19 Counsel, filed on December 10, 2015 (the "Motion"). No oppositions were filed and the time to
20 file oppositions has expired. Pursuant to First Judicial District Court Rule ("FJDCR") 15(5), a
21 failure of an opposing party to file a memorandum of points and authorities in opposition to any
22 motion within the time permitted shall constitute a consent to the granting of the motion.

23 After considering the Motion, the Affidavit of Severin A. Carlson in support of the
24 Motion, the papers and pleadings on file herein, Supreme Court Rule ("SCR") 46, FJDCR 22,

1 and Nevada Rule of Professional Conduct (“NRPC”) 1.16, and for good cause appearing, the
2 Court hereby grants the Motion to Withdraw as Counsel.

3 The Court finds that the reasons for withdrawal set forth by Severin A. Carlson, make the
4 request to withdraw reasonable and justify granting the Motion, to wit: Defendant has
5 substantially failed to fulfill his obligations to Kaempfer Crowell regarding its services, that
6 Kaempfer Crowell’s representation has also been rendered unreasonably difficult as a result of
7 Defendant’s failure to meet his obligations to counsel, and that Defendant insists upon taking
8 action that the lawyer considers repugnant or with which the lawyer has fundamental
9 disagreement.

10 NOW THEREFORE, **IT HEREBY IS ORDERED** as follows:

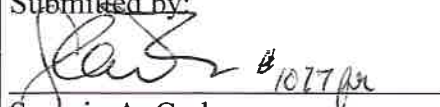
- 11 1. That the Motion is hereby **GRANTED** in its entirety; and
- 12 2. That Kaempfer Crowell, Severin A. Carlson, and Tara C. Zimmerman are no
13 longer counsel of record for Defendant Reza Zandian.

14 **IT IS SO ORDERED.**

15 DATED: This 30th day of December, 2015.

16
17 
18 JAMES TODD RUSSELL
DISTRICT COURT JUDGE

19 Submitted by:

20 
21 Severin A. Carlson
22 Nevada Bar No. 9373
Kaempfer Crowell
(775) 852-3900

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 Former 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
(Nevada Supreme Court Docket No. 69372)

21 **NOTICE OF REQUEST FOR TRANSCRIPT OF PROCEEDINGS**

22 TO THE FIRST JUDICIAL DISTRICT COURT, 885 EAST MUSSER STREET, THIRD
23 FLOOR, CARSON CITY, NEVADA 89701.

24 //././

REC'D & FILED
2016 JAN -4 PM 3:49
SUSAN MERRINE TREA
CLERK
BY _____
DEPUTY

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 Pursuant to NRAP 9(a)(3)(A)-(B), this Notice is being filed with the First Judicial District
2 Court and served on the interested parties with respect to Nevada Supreme Court Docket No.
3 69372.

4 On December 29, 2015, Defendant REZA ZANDIAN A/K/A GOLAMREZA
5 ZANDIANJAZI A/K/A GHOLAM REZA ZANDIAN A/K/A REZA JAZI A/K/A J. REZA JAZI
6 A/K/A G. REZA JAZI A/K/A GHONOREZA ZANDIAN JAZI (“Defendant”) requested one CD
7 of the proceedings held on November 5, 2015, before the Honorable James T. Russell on Plaintiff
8 JED MARGOLIN’s (“Plaintiff”) Motion for Judgment Debtor Exam and for Production of
9 Documents (“Motion”). Copies of the CD request form and receipt are attached hereto as
10 **Exhibit 1.**

11 A CD was requested as the First Judicial District Court makes JAVS recordings of
12 proceedings and provides CDs of said recordings in lieu of transcripts. it is understood that a CD
13 of the JAVS recording will be provided in lieu of a transcript. Once requested, CDs generally take
14 one to two weeks to process. Once Defendant receives the CD, he will have it transcribed by a
15 certified court reporter. Upon completion of said transcript, it will be provided to counsel and the
16 Supreme Court in Docket No. 69372.

17 I hereby certify that on the 29th day of December, 2015, I ordered or caused to be ordered a
18 CD of the First Judicial District Court’s JAVS recording listed above and paid the required fee of
19 \$10.00. I further certify that on the 4th day of January, 2016, notice is being filed with the First
20 Judicial District Court and served on the interested parties.

21 /./././

22 /./././


23 /./././

24 /./././

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

3 DATED this 4th day of January, 2016.

4 KAEMPFER CROWELL

5 BY:  #1027 pu
6 SEVERIN A. CARLSON
7 Nevada Bar No. 9373
8 TARA C. ZIMMERMAN
9 Nevada Bar No. 12146
10 510 West Fourth Street
11 Carson City, Nevada 89703
12 **Former Attorneys for Defendant**
13 **REZA ZANDIAN**

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

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1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 4th day of January, 2016, I caused the
3 foregoing **NOTICE OF REQUEST FOR TRANSCRIPT OF PROCEEDINGS** to be served
4 by depositing a true copy of the same for mailing at Carson City, Nevada, first class postage
5 fully prepaid and addressed to the following:

6 Matthew D. Francis, Esq.
7 Adam P. McMillen, Esq.
8 Watson Rounds
9 5371 Kietzke Lane
10 Reno, Nevada 89511
11 775.324.4100
12 775.333.8171 - facsimile
13 **Attorneys for Plaintiff**

14 Reza Zandian
15 c/o Alborz Zandian
16 9 MacArthur Place, Unit 2105
17 Santa Ana, California 92707-6753
18 **Defendant**

Gholam Reza Zandian Jazi
6 rue Edouard Fournier
75116 Paris
France
Defendant

19 I also caused the foregoing **NOTICE OF REQUEST FOR TRANSCRIPT OF**
20 **PROCEEDINGS** to be served this date by e-mail as follows:

21 rezazand@hotmail.com

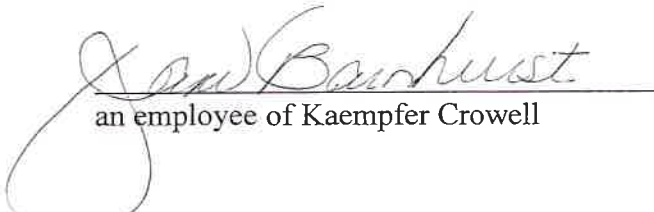
22 
23 an employee of Kaempfer Crowell
24

EXHIBIT INDEX

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EXHIBIT	DESCRIPTION	PAGES
1	Public CD Rom Order Form	2

EXHIBIT 1

EXHIBIT 1

**FIRST JUDICIAL DISTRICT COURT
JUSTICE AND MUNICIPAL COURT**
PUBLIC CD ROM ORDER FORM (CD ONLY)

885 E. MUSSER STREET CARSON CITY, NV 89701, STE 2007
DISTRICT COURT (775) 887-2082 (Third Floor)
JUSTICE/MUNICIPAL COURT (775) 887-2121 (Second Floor)

PLEASE BE ADVISED THAT THIS IS NOT A REQUEST FOR A TRANSCRIPT

Request for a copy of court proceedings may be submitted to the Clerk's Office in each respective court. Please anticipate 2 to 4 weeks for completion of order. **COPY OF A CD IS NOT A SUBSTITUTE FOR A CERTIFIED COURT REPORTER TRANSCRIPT. THE COURT DOES NOT TRANSCRIBE CD RECORDINGS. THE JUSTICE COURT WILL FORWARD CRIMINAL MATTERS FOR TRANSCRIPTION TO APPROVED TRANSCRIBERS. DISTRICT COURT TRANSCRIPTS MUST BE ARRANGED BY THE REQUESTING PARTY AND TRANSCRIBED BY A CERTIFIED COURT REPORTER. THE COURTS USE CAPITOL REPORTERS LOCATED AT 203 N. CURRY ST., CARSON CITY, NEVADA 89703 OFFICE #(775) 882-5322 OR SUNSHINE REPORTING SERVICES AT (775) 323-3411.**

\$10.00 One Court Proceeding on CD ROM
 \$ 9.50 To add one additional day of Court Proceedings to a previously duplicated tape.
Each additional date added (____dates)

State Agency (No Charge) _____ Agency Name Indigent Request (No Charge) _____ Name

Parties: **Jed Margolin** vs. **Optima Technology, et al.**

Case No. **09 OC 00579 1B** Dept **I** Judge **Hon. James T. Russell**

Date(s) of Proceeding: **November 5, 2015**

Requesting Party or Firm Name: **Kaempfer Crowell**

Address: **50 West Liberty Street, Suite 700**

City/State/Zip: **Reno, Nevada 89501**

Phone No(s): **775.398.4737** Contact Name: **Sheryl**

PLEASE NOTE: THE VIEWING OF DOMESTIC PROCEEDINGS BY MINOR CHILDREN IS NOT CONSIDERED TO BE IN THEIR BEST INTEREST. THE PURPOSE OF THE CD RECORDING IS FOR ATTORNEYS AND CLIENTS AND IS PROHIBITED FROM BEING PUBLISHED OR SOLD. YOU MAY BE FOUND IN CONTEMPT OF COURT FOR VIOLATING THIS POLICY.

-INTEROFFICE USE ONLY-

Order Received by: _____ Date: _____

Order Filled by: _____ Date: _____

Client Notified: _____ Time: _____ VM Date: _____

CD Received by: _____ Date: _____

FIRST JUDICIAL DISTRICT COURT
885 EAST MOSSER ST SUITE 3031

Receipt Number 42520

Receipt Date 12/29/2015

Description Receipt for: CD-ROM FEE

Received From CUSTOMER

Total Received	10.00
Net Received	10.00
Change	0.00

Receipt Payments	Amount	Reference	Description
CASH	10.00		

Receipt Applications	Amount
COST	10.00

Balance Due 0.00

Comments:


Deputy Clerk: 1BCCOOPER Transaction Date 12/29/2015
16:33:03.24

ORIGINAL

REC'D & FILED

2016 JAN -7 PM 4:06

SUSAN MERRIWETHER
CLERK

BY 
DEPUTY

1 Case No.: 09 OC 00579 1B

2 Dept. No.: 1

3
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.

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.

AMENDED ORDER GRANTING MOTION
TO WITHDRAW AS COUNSEL

23 This matter comes before the Court on Kaempfer Crowell's Motion to Withdraw as Counsel,
24 filed on December 10, 2015 (the "Motion"). An opposition was timely filed within the ten (10) day
25 requirement of Rule 15(3) of the First Judicial District Court Rules ("FJDCR"), to include three days
26 for mailing, on December 28, 2015.

27 This Court was unaware on December 31, 2015, when it issued its Order Granting Motion to
28 Withdraw as Counsel that an opposition had been filed. As such, this amended order is being issued.

After considering the Motion, the Affidavit of Severin A. Carlson in support of the Motion,
the papers and pleadings on file herein, Supreme Court Rule ("SCR") 46, FJDCR 22, and Nevada
Rule of Professional Conduct ("NRPC") 1.16, and for good cause appearing, the Court hereby grants
the Motion to Withdraw as Counsel.

1 The Court finds that the reasons for withdrawal set forth by Severin A. Carlson, make the
2 request to withdraw reasonable and justify granting the Motion, to wit: Defendant has substantially
3 failed to fulfill his obligations to Kaempfer Crowell regarding its services, that Kaempfer Crowell's
4 representation has also been rendered unreasonably difficult as a result of Defendant's failure to
5 meet his obligations to counsel, and that Defendant insists upon taking action that the lawyer
6 considers repugnant or with which the lawyer has fundamental disagreement.

7 However, as pointed out by the Plaintiff, this tactic has been used by the Defendant before in
8 this case for delay purposes. As such, this order is conditioned on a valid address in California
9 and/or Nevada being provided to the Plaintiff for service of any and all documents on Defendant,
10 Reza Zandian. Additionally, the Defendant is ordered to comply with this Court's Order of
11 November 6, 2015 as to appearing at a Judgment Debtor's Examination in San Diego, California in
12 the month of February, 2016, at a specific location chosen by Plaintiff. Failure to do so will result in
13 an order to show cause being issued by this Court.

14 NOW THEREFORE, **IT IS HEREBY ORDERED** as follows:

- 15 1. That the Motion to Withdraw as Counsel is hereby **GRANTED** upon the condition that a
16 valid address is provided by Defendant in California and/or Nevada for the purpose of
17 service of any and all documents; and
- 18 2. That Kaempfer Crowell, Severin A. Carlson, and Tara C. Zimmerman shall no longer be
19 counsel of record for Defendant Reza Zandian upon the providing of the address for
20 service in Nevada and/or California.
- 21 3. That the Defendant, Reza Zandian, is ordered to comply with this Court's Order of
22 November 6, 2015 as to appearing at a Judgment Debtor's Examination at a specific
23 location chosen by Plaintiff; and
- 24 4. Failure of Defendant, Reza Zandian, to comply with this Order will result in this Court
25 issuing an Order to Show Cause as to why said defendant should not be held in contempt.

26 Dated this 7th day of January, 2016.

27 
28 JAMES T. RUSSELL
DISTRICT JUDGE


1 CERTIFICATE OF MAILING

2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the
3 7th day of January, 2016, I served a copy of the foregoing Order by United States Mail, postage
4 prepaid, addressed as follows:

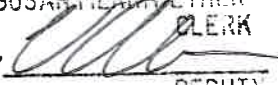
5 Matthew D. Francis, Esq.
6 Adam P. McMillen, Esq.
7 5371 Kietzke Lane
8 Reno, NV 89511

9 Severin A. Carlson, Esq.
10 Tara C. Zimmerman, Esq.
11 510 West Fourth Street
12 Carson City, NV 89703

13 Reza Zandian
14 c/o Alborz Zandian
15 9 MacArthur Place, Unit 2105
16 Santa Ana, California 92707-6753

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Angela Jeffries
Judicial Assistant, Dept. 1

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

REC'D & FILED
2016 JAN 13 PM 3: 20
SUSAN MERRIETHNER
CLERK
BY  DEPUTY

8 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

9 IN AND FOR CARSON CITY

10 JED MARGOLIN, an individual,

Case No. 090C00579 1B

Dept. No. 1

11 Plaintiff,

12 vs.

**NOTICE OF ENTRY OF ORDER
GRANTING MOTION TO WITHDRAW
AS COUNSEL**

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

19 Defendants.

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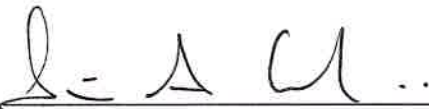
**NOTICE OF ENTRY OF ORDER GRANTING
MOTION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that an Order Granting Motion to Withdraw as Counsel was entered by the Court on the 31st day of December, 2015. A true and correct copy is attached hereto as **Exhibit 1**.

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

DATED this 4th day of January, 2016.

KAEMPFER CROWELL

BY: 
SEVERIN A. CARLSON
Nevada Bar No. 9373
TARA C. ZIMMERMAN
Nevada Bar No. 12146
510 West Fourth Street
Carson City, Nevada 89703
**Former Attorneys for
Defendant REZA ZANDIAN**

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the ^{12TH} day of January, 2016, I caused the
3 foregoing **NOTICE OF ENTRY OF ORDER GRANTING MOTION TO WITHDRAW AS**
4 **COUNSEL** to be served this date by depositing a true copy of the same for mailing at Reno,
5 Nevada, first class postage fully prepaid and addressed to the following:

6 Matthew D. Francis, Esq.
7 Adam P. McMillen, Esq.
8 Watson Rounds
9 5371 Kietzke Lane
10 Reno, Nevada 89511
11 775.324.4100
12 775.333.8171 - facsimile
13 **Attorneys for Plaintiff**

14 Reza Zandian
15 c/o Alborz Zandian
16 9 MacArthur Place, Unit 2105
17 Santa Ana, California 92707-6753
18 **Defendant**

19 Gholam Reza Zandian Jazi
20 6 rue Edouard Fournier
21 75116 Paris
22 France
23 **Defendant**

24 I also caused the foregoing **NOTICE OF ENTRY OF ORDER GRANTING**
MOTION TO WITHDRAW AS COUNSEL to be served this date by e-mail to Defendant as
follows:

rezazand@hotmail.com


an employee of Kaempfer Crowell

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EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGES
1	Order Granting Motion to Withdraw as Counsel	3

EXHIBIT 1

EXHIBIT 1

1 Case No. 09 OC 00579 1B

2 Dept. No. I

REC'D & FILED
2015 DEC 31 PM 1:05

SUSAN M. ...
BY: *[Signature]*

3
4
5
6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR CARSON CITY

8 JED MARGOLIN, an individual,

Case No. 090C00579 1B

Dept. No. 1

9 Plaintiff,

**PROPOSED ORDER GRANTING
MOTION TO WITHDRAW AS
COUNSEL**

10 vs.

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

22 Defendants.

23 This matter comes before the Court on Kaempfer Crowell's Motion to Withdraw as
24 Counsel, filed on December 10, 2015 (the "Motion"). No oppositions were filed and the time to
file oppositions has expired. Pursuant to First Judicial District Court Rule ("FJDCR") 15(5), a
failure of an opposing party to file a memorandum of points and authorities in opposition to any
motion within the time permitted shall constitute a consent to the granting of the motion.

After considering the Motion, the Affidavit of Severin A. Carlson in support of the
Motion, the papers and pleadings on file herein, Supreme Court Rule ("SCR") 46, FJDCR 22,



1 and Nevada Rule of Professional Conduct ("NRPC") 1.16, and for good cause appearing, the
2 Court hereby grants the Motion to Withdraw as Counsel.

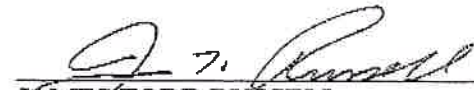
3 The Court finds that the reasons for withdrawal set forth by Severin A. Carlson, make the
4 request to withdraw reasonable and justify granting the Motion, to wit: Defendant has
5 substantially failed to fulfill his obligations to Kaempfer Crowell regarding its services, that
6 Kaempfer Crowell's representation has also been rendered unreasonably difficult as a result of
7 Defendant's failure to meet his obligations to counsel, and that Defendant insists upon taking
8 action that the lawyer considers repugnant or with which the lawyer has fundamental
9 disagreement.

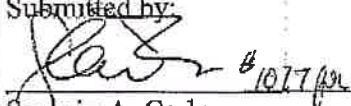
10 NOW THEREFORE, **IT HEREBY IS ORDERED** as follows:

- 11 1. That the Motion is hereby **GRANTED** in its entirety; and
- 12 2. That Kaempfer Crowell, Severin A. Carlson, and Tara C. Zimmerman are no
13 longer counsel of record for Defendant Reza Zandian.

14 **IT IS SO ORDERED.**

15 DATED: This 30th day of December, 2015.

17 
18 JAMES TODD RUSSELL
DISTRICT COURT JUDGE

19 Submitted by:
20 
21 Severin A. Carlson
22 Nevada Bar No. 9373
Kaempfer Crowell
(775) 852-3900

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

5 Attorneys for Defendant
6 REZA ZANDIAN

REC'D & FILED

2016 JAN 13 PM 3:20

SUSAN HERRIN ETHER
CLERK

BY  DEPUTY

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,

vs.

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

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

**NOTICE OF ENTRY OF AMENDED
ORDER GRANTING MOTION TO
WITHDRAW AS COUNSEL**

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**NOTICE OF ENTRY OF AMENDED ORDER GRANTING
MOTION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that an Amended Order Granting Motion to Withdraw as Counsel was entered by the Court on the 7th day of January, 2016. A true and correct copy of said Amended Order is attached hereto as **Exhibit 1**.

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

DATED this 8th day of January, 2016.

KAEMPFER CROWELL

BY:



SEVERIN A. CARLSON
Nevada Bar No. 9373
510 West Fourth Street
Carson City, Nevada 89703
Attorneys for Defendant REZA ZANDIAN

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the ^{12TH} ~~5TH~~ day of January, 2016, I caused the
3 foregoing **NOTICE OF ENTRY OF AMENDED ORDER GRANTING MOTION TO**
4 **WITHDRAW AS COUNSEL** to be served this date by depositing a true copy of the same for
5 mailing at Reno, Nevada, first class postage fully prepaid and addressed to the following:

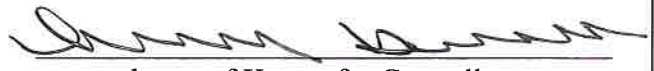
6 Matthew D. Francis, Esq.
7 Adam P. McMillen, Esq.
8 Watson Rounds
9 5371 Kietzke Lane
10 Reno, Nevada 89511
11 775.324.4100
12 775.333.8171 - facsimile
13 **Attorneys for Plaintiff**

14 Reza Zandian
15 c/o Alborz Zandian
16 9 MacArthur Place, Unit 2105
17 Santa Ana, California 92707-6753
18 **Defendant**

19 Gholam Reza Zandian Jazi
20 6 rue Edouard Fournier
21 75116 Paris
22 France
23 **Defendant**

24 I also caused the foregoing **NOTICE OF ENTRY OF AMENDED ORDER**
GRANTING MOTION TO WITHDRAW AS COUNSEL to be served this date by e-mail to
Defendant as follows:

rezazand@hotmail.com


an employee of Kaempfer Crowell

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EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGES
1	Amended Order Granting Motion to Withdraw as Counsel	4

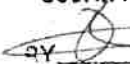
1 Case No.: 09 OC 00579 1B

2 Dept. No.: 1

REC'D & FILED

2016 JAN -7 PM 4: 06

SUSAN MERRIWETHER
CLERK


DEPUTY

3
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.

AMENDED ORDER GRANTING MOTION
TO WITHDRAW AS COUNSEL

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
23 Defendants.

24 This matter comes before the Court on Kaempfer Crowell's Motion to Withdraw as Counsel,
25 filed on December 10, 2015 (the "Motion"). An opposition was timely filed within the ten (10) day
26 requirement of Rule 15(3) of the First Judicial District Court Rules ("FJDCR"), to include three days
27 for mailing, on December 28, 2015.

28 This Court was unaware on December 31, 2015, when it issued its Order Granting Motion to
Withdraw as Counsel that an opposition had been filed. As such, this amended order is being issued.

After considering the Motion, the Affidavit of Severin A. Carlson in support of the Motion,
the papers and pleadings on file herein, Supreme Court Rule ("SCR") 46, FJDCR 22, and Nevada
Rule of Professional Conduct ("NRPC") 1.16, and for good cause appearing, the Court hereby grants
the Motion to Withdraw as Counsel.

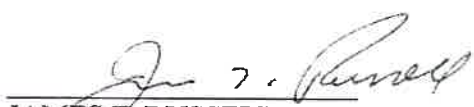
1 The Court finds that the reasons for withdrawal set forth by Severin A. Carlson, make the
2 request to withdraw reasonable and justify granting the Motion, to wit: Defendant has substantially
3 failed to fulfill his obligations to Kaempfer Crowell regarding its services, that Kaempfer Crowell's
4 representation has also been rendered unreasonably difficult as a result of Defendant's failure to
5 meet his obligations to counsel, and that Defendant insists upon taking action that the lawyer
6 considers repugnant or with which the lawyer has fundamental disagreement.

7 However, as pointed out by the Plaintiff, this tactic has been used by the Defendant before in
8 this case for delay purposes. As such, this order is conditioned on a valid address in California
9 and/or Nevada being provided to the Plaintiff for service of any and all documents on Defendant,
10 Reza Zandian. Additionally, the Defendant is ordered to comply with this Court's Order of
11 November 6, 2015 as to appearing at a Judgment Debtor's Examination in San Diego, California in
12 the month of February, 2016, at a specific location chosen by Plaintiff. Failure to do so will result in
13 an order to show cause being issued by this Court.

14 NOW THEREFORE, **IT IS HEREBY ORDERED** as follows:

- 15 1. That the Motion to Withdraw as Counsel is hereby **GRANTED** upon the condition that a
16 valid address is provided by Defendant in California and/or Nevada for the purpose of
17 service of any and all documents; and
- 18 2. That Kaempfer Crowell, Severin A. Carlson, and Tara C. Zimmerman shall no longer be
19 counsel of record for Defendant Reza Zandian upon the providing of the address for
20 service in Nevada and/or California.
- 21 3. That the Defendant, Reza Zandian, is ordered to comply with this Court's Order of
22 November 6, 2015 as to appearing at a Judgment Debtor's Examination at a specific
23 location chosen by Plaintiff; and
- 24 4. Failure of Defendant, Reza Zandian, to comply with this Order will result in this Court
25 issuing an Order to Show Cause as to why said defendant should not be held in contempt.

26 Dated this 7th day of January, 2016.

27
28 
JAMES T. RUSSELL
DISTRICT JUDGE


1 CERTIFICATE OF MAILING

2 The undersigned, an employee of the First Judicial District Court, hereby certifies that on the
3 7th day of January, 2016, I served a copy of the foregoing Order by United States Mail, postage
4 prepaid, addressed as follows:

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

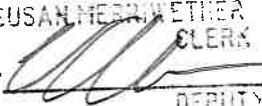
9 Severin A. Carlson, Esq.
10 Tara C. Zimmerman, Esq.
11 510 West Fourth Street
12 Carson City, NV 89703

13 Reza Zandian
14 c/o Alborz Zandian
15 9 MacArthur Place, Unit 2105
16 Santa Ana, California 92707-6753

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Angela Jeffries
Judicial Assistant, Dept. 1

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

REC'D & FILED /
2016 JAN 13 PM 3:20
SUSAN HERRMETHNER
CLERK
BY  DEPUTY

5 Attorneys for Defendant
6 REZA ZANDIAN

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,
vs.

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

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

17 Defendants.
18

19
20 **AFFIDAVIT OF SEVERIN A. CARLSON IN RESPONSE TO AMENDED ORDER**
GRANTING MOTION TO WITHDRAW

21 STATE OF NEVADA)
) ss.
22 COUNTY OF WASHOE)

23 SEVERIN A. CARLSON, being first duly sworn, under penalty of perjury, deposes and
24 states:

KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

1 1. I am an attorney licensed to practice law in the State of Nevada and am a partner
2 with the law firm of Kaempfer Crowell, counsel for Defendant REZA ZANDIAN aka
3 GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J.
4 REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI (“Zandian”) in the
5 above-entitled action.

6 2. I have personal knowledge of all matters stated herein and could and would
7 competently testify as to the matters set forth herein and make this affidavit under penalty of
8 perjury.

9 3. On January 7, 2016, the Court entered an Amended Order Granting Motion to
10 Withdraw as Counsel (“Amended Order”).

11 4. In the Amended Order, the Court placed a condition on the withdrawal of counsel,
12 stating that withdrawal would not be complete until a service address for Zandian in Nevada
13 and/or California had been provided.

14 5. This Affidavit is made in response to the Amended Order with respect to the
15 conditional withdrawal.

16 6. On or about January 7, 2016, Zandian provided to this office a residency
17 certificate setting forth his residential address in France, albeit in French. A true and correct copy
18 of said certificate is attached hereto as **Exhibit 1**.

19 7. Zandian’s son lives in California and his address has been provided by Zandian as
20 an acceptable means of service on Zandian.

21 8. Zandian’s son’s name is Alborz Zandian and his address is 9 MacArthur Place,
22 Unit 2105, Santa Ana, California 92707-6753.

23 /./././

24 /./././

1 CERTIFICATE OF SERVICE

2 I, the undersigned, hereby certify that on the 12th day of January, 2016, I caused the
3 foregoing **AFFIDAVIT OF SEVERIN A. CARLSON IN RESPONSE TO AMENDED**
4 **ORDER GRANTING MOTION TO WITHDRAW** to be served this date by depositing a true
5 copy of the same for mailing at Reno, Nevada, first class postage fully prepaid and addressed to
6 the following:

7 Matthew D. Francis, Esq.
8 Adam P. McMillen, Esq.
9 Watson Rounds
10 5371 Kietzke Lane
11 Reno, Nevada 89511
12 775.324.4100
13 775.333.8171 - facsimile
14 **Attorneys for Plaintiff**

11 Reza Zandian
12 c/o Alborz Zandian
13 9 MacArthur Place, Unit 2105
14 Santa Ana, California 92707-6753
15 **Defendant**

14 Gholam Reza Zandian Jazi
15 6 rue Edouard Fournier
16 75116 Paris
17 France
18 **Defendant**

18 I also caused the foregoing **AFFIDAVIT OF SEVERIN A. CARLSON IN**
19 **RESPONSE TO AMENDED ORDER GRANTING MOTION TO WITHDRAW** to be
20 served this date by e-mail to Defendant as follows:

21 rezazand@hotmail.com

22 
23 an employee of Kaempfer Crowell

24
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703

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EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGES
1	French residency certificate	4

EXHIBIT 1

EXHIBIT 1

RÉPUBLIQUE FRANÇAISE
AUTORISATION PROVISOIRE DE SÉJOUR

PRÉFECTURE PRÉFECTURE DE POLICE
DOSSIER N° 105T000000
ENTRÉE EN FRANCE 15/03/2012

N° 8913081553

NOM (M.) ZANDIAN JAZI
PRÉNOMS CHOJAH REZA
NÉ(E) LE 15/01/1952 A ISPAHAN
NATIONALITÉ TRANSAISSINE
ADRESSE 06 RIIR ROUJARD FOURNIER
75116 PARTS



EST AUTORISÉ(E) A PROLONGER PROVISOIREMENT
SON SÉJOUR EN FRANCE JUSQU'AU 23/03/2016

SIGNATURE ET CACHET
DE L'AUTORITÉ

CETTE AUTORISATION N'EST VALABLE QU'ACCOMPAGNÉE DU DOCUMENT
NO H95626481 VALABLE DU 05/07/2013 AU 05/07/2016
JUSTIFIANT DE L'IDENTITÉ DE SON TITULAIRE.

*Président de l'Institut National de la Santé et de la Sécurité
Le Directeur*

Cyrille MAILLET - M 1

SIGNATURE
DU TITULAIRE

FAIT A PARTS (CTTR)
LE 24/11/2015

VALABLE JUSQU'AU 23/03/2016
02524821

CETTE AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

RÉPUBLIQUE FRANÇAISE
AUTORISATION PROVISOIRE DE SÉJOUR

PRÉFECTURE PRÉFECTURE DE POLICE
DOSSIER N° 105T00000
ENTRÉE EN FRANCE 15/03/2012

N° 8913081553

NOM (M.) ZANDIAN JAZI
PRÉNOMS CHOLAM REZA
NÉE/LE 15/01/1952 A ISFAHAN
NATIONALITÉ IRANIENNE
ADRESSE 06 RUE RICHARD POURNIER
75116 PARIS



EST AUTORISÉ(E) À PROLONGER PROVISOIREMENT
SON SÉJOUR EN FRANCE JUSQU'AU 23/03/2016

SIGNATURE ET CACHET
DE L'AUTORITÉ

CETTE AUTORISATION N'EST VALABLE QU'ACCOMPAGNER DU DOCUMENT
NO 89562821 VALABLE DU 05/07/2013 AU 05/07/2015
JUSTIFIANT DE L'IDENTITÉ DE SON TITULAIRE.

Président de la Préfecture de Police
Le Directeur

Cyrille MAILLET - M 1

SIGNATURE
DU TITULAIRE

FAIT A PARTS (OTTE)
LE 24/11/2015

VALABLE JUSQU'AU 23/03/2016
02524821

CETTE AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

IMPRIMERIE NATIONALE - Version 0514 - 04/10/2010 - 13/12/10

RÉPUBLIQUE FRANÇAISE
AUTORISATION PROVISOIRE DE SÉJOUR

DIRECCTION DÉPARTEMENTALE
DE LA POLICE
15000000

N° 9913081553

15/03/2012

(.) ZANDIAN JAZI



ROJAN REZA

17/01/1952 A TSPANAN

ANTENNE

5 RUE EDOUARD POIRRE

9116 PARIS

A PROLONGER PROVISOIREMENT
RANGE JUSQU'AU 23/03/2016

SIGNATURE ET CACHET
DE L'AUTORITÉ

CE DOCUMENT N'EST VALABLE QU'ACCOMPAGNER DU DOCUMENT
VALABLE DU 05/07/2013 AU 05/07/2018
D'IDENTIFIER SON TITULAIRE.

Pour le Préfet de Police et par délégation
Le Directeur de la Préfecture de Police

Cyrille MAILLET - M1

FAIT A PARIS (CITR)
LE 24/11/2015

VALABLE JUSQU'AU 23/03/2016
02524821

AUTORISATION NE PERMET PAS A SON TITULAIRE D'OCCUPER UN EMPLOI

IMPRIMERIE NATIONALE - Version 0014 - CA 140860-1 (14380 D)

1 Adam McMillen
2 amcmillen@bhfs.com
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP
4 5371 Kietzke Lane
5 Reno, NV 89511
6 Telephone: 775.324.4100
7 Facsimile: 775.333.8171

8 Attorneys for Plaintiff
9 JED MARGOLIN

REC'D & FILED ✓

2016 JAN 14 AM 11:00

SUSAN MERRIWETHER
CLERK

BY  DEPUTY

10 IN THE FIRST JUDICIAL COURT OF THE STATE OF NEVADA
11 IN AND FOR CARSON CITY

12 JED MARGOLIN, an individual,

13 Plaintiff,

14 vs.

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

27 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**MOTION FOR ORDER TO SHOW CAUSE
REGARDING CONTEMPT
AND EX PARTE MOTION FOR
ORDER SHORTENING TIME**

28 Plaintiff Jed Margolin requests this Court issue an Order requiring Reza Zandian
29 (“Zandian”) to show cause why he should not be held in contempt of court for having violated the
30 Court’s November 6, 2015 Order Granting Plaintiff’s Motion for Debtor Examination and to
31 Produce Documents. In that Order, Zandian was ordered to produce to Plaintiff’s counsel on or
32 before December 21, 2015, certain documents related to Zandian’s financial affairs. No such
33 documents have been produced.

1 On January 7, 2016, this Court issued an Amended Order Granting Motion to Withdraw
2 as Counsel. In pertinent part, that Order requires Zandian to comply with the November 6, 2015
3 Order “as to appearing at a Judgment Debtor’s Examination at a specific location chosen by
4 Plaintiff” in February 2016 and that Zandian’s failure to comply with the January 7, 2016 Order
5 will result in the Court issuing an Order to Show Cause as to why Zandian should not be held in
6 contempt. The January 7, 2016 Order did not address the document production of the November
7 6, 2015 Order, presumably because the December 21, 2015 deadline had already passed.
8 Nevertheless, the documents have not been produced and without the documents the debtor’s
9 examination will be less effective.

10 In addition, the Nevada Supreme Court recently stated in its January 7, 2016 Order to
11 Show Cause that “[n]o statute or court rule provides for an appeal from an order directing a
12 debtor’s examination or to produce documents.” See Exhibit 1. As Zandian has not provided any
13 justification for failing to produce the documents, Plaintiff requests Zandian be ordered to show
14 cause as to why he should not be held in contempt of court.

15 NRS 1.210(3) states that “[t]he Court has the power to compel obedience to its orders.”
16 NRS 22.010(3) provides that the “refusal to abide by a lawful order issued by the Court is
17 contempt.” See also *Matter of Water Rights of Humboldt River*, 118 Nev. 901, 907, 59 P.3d
18 1226, 1229–30 (2002) (noting that the district court generally has particular knowledge of
19 whether contemptible conduct occurred and thus its decisions regarding contempt are given
20 deference). “Courts have inherent power to enforce their decrees through civil contempt
21 proceedings, and this power cannot be abridged by statute.” In *re Determination of Relative
22 Rights of Claimants & Appropriators of Waters of Humboldt River Stream Sys. & Tributaries*,
23 118 Nev. 901, 909, 59 P.3d 1226, 1231 (2002) (citing *Noble v. Noble*, 86 Nev. 459, 463, 470
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1 P.2d 430, 432 (1970). “A civil contempt order may be used to compensate the contemnor’s
2 adversary for costs incurred because of the contempt.” Id. (citing State, Dep’t Indus. Rel. v.
3 Albanese, 112 Nev. 851, 856, 919 P.2d 1067, 1070–71 (1996)).

4 “[D]istrict judges are afforded broad discretion in imposing sanctions” and the Nevada
5 Supreme Court “will not reverse the particular sanctions imposed absent a showing of abuse of
6 discretion.” State, Dep’t of Indus. Relations, Div. of Indus. Ins. Regulation v. Albanese, 112 Nev.
7 851, 856, 919 P.2d 1067, 1070 (1996) (citing Young v. Johnny Ribeiro Building, 106 Nev. 88,
8 92, 787 P.2d 777, 779 (1990)).

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

20 Here, it is undisputed Zandian violated this Court’s November 6, 2015 Order by failing to
21 produce the documents by December 21, 2015. There is no justification for Zandian’s failure.
22 The full damages to Plaintiff from Zandian’s conduct and contempt for this Court cannot be
23 measured.

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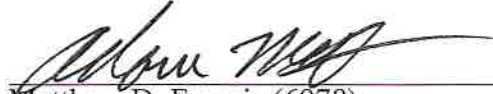
AFFIRMATION PURSUANT TO NRS 239B.030

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

Dated this 13th day of January, 2016.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

BY:



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

Attorneys for Plaintiff Jed Margolin

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, MOTION FOR ORDER TO SHOW CAUSE REGARDING CONTEMPT AND EX PARTE MOTION FOR ORDER SHORTENING TIME, addressed as follows:

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, CA 92707-6753

Severin A. Carlson
Tara C. Zimmerman
Kaempfer Crowell
50 West Liberty Street, Suite 700
Reno, Nevada 89501

Dated: January 13, 2016



Nancy Lindsley

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EXHIBIT LIST

EXHIBIT NO. **DESCRIPTION** **PAGE(S)**

1 ORDER TO SHOW CAUSE 3

Exhibit 1

Exhibit 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.

No. 69372

FILED

JAN 07 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

ORDER TO SHOW CAUSE

This is an appeal from an order granting a motion requiring appellant to appear for a debtor's examination and to produce documents. Our preliminary review of the docketing statement and the documents submitted to this court pursuant to NRAP 3(g) reveals a potential jurisdictional defect. Specifically, it appears that the judgment or order designated in the notice of appeal is not substantively appealable. See NRAP 3A(b). This court has jurisdiction to consider an appeal only when the appeal is authorized by statute or court rule. *Taylor Constr. Co. v. Hilton Hotels*, 100 Nev. 207, 678 P.2d 1152 (1984). No statute or court rule provides for an appeal from an order directing a debtor's examination or to produce documents. See e.g., *Wardleigh v. Second Judicial Dist. Court In & For Cty. of Washoe*, 111 Nev. 345, 351, 891 P.2d 1180, 1184 (1995) (a writ of prohibition will issue to prevent discovery required by court order entered in excess of the court's jurisdiction). In addition, the order does not appear to be appealable as a special order after final judgment because it does not modify the rights or liabilities of the parties arising from the final judgment, but instead merely enforces the district

court's prior orders. See NRAP 3A(b)(2); *Wilkinson v. Wilkinson*, 73 Nev. 143, 311 P.2d 735 (1957).

Accordingly, appellant shall have 30 days from the date of this order within which to show cause why this appeal should not be dismissed for lack of jurisdiction. In responding to this order, appellant should submit any documentation that may establish this court's jurisdiction. We caution appellant that failure to demonstrate that this court has jurisdiction may result in this court's dismissal of this appeal. The preparation of transcripts and the briefing schedule in this appeal shall be suspended pending further order of this court. Respondent may file any reply within ten days from the date that appellant's response is served.

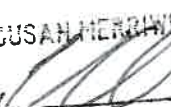
It is so ORDERED.¹

 C.J.

cc: Kaempfer Crowell/Reno
Kaempfer Crowell/Carson City
Brownstein Hyatt Farber Schreck, LLP/Reno

¹We defer ruling on appellant's counsel's motion to withdraw as counsel pending resolution of this jurisdictional question.

1 Adam P. McMillen, Bar No. 10678
2 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

REC'D & FILED
2016 JAN 14 PM 3:29
SUSAN HERBOWETHER
CLERK
BY  DEPUTY

8 Attorney for Plaintiff JED MARGOLIN

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.

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.

REQUEST FOR SUBMISSION

27 It is hereby requested that Plaintiff's Ex Parte Motion Shortening Time for Defendant to
28 respond to Plaintiff's Motion for Order to Show Cause Regarding Contempt, filed on or about
January 14, 2016, be submitted to the Court for decision.

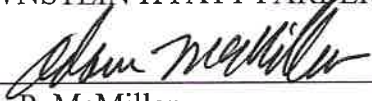
Attached as Exhibit 1, is a proposed Order Shortening Time.

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: January 14, 2016.

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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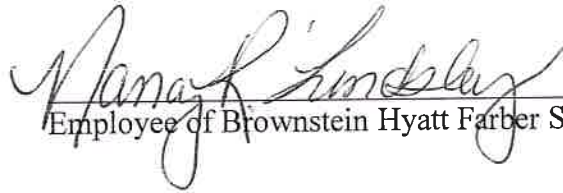
CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, REQUEST FOR SUBMISSION, addressed as follows:

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, CA 92707-6753

Severin A. Carlson
Tara C. Zimmerman
Kaempfer Crowell
50 West Liberty Street, Suite 700
Reno, Nevada 89501

Dated: January 14, 2016.


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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Exhibit 1

Exhibit 1

1 Adam McMillen
2 amcmillen@bhfs.com
3 BROWNSTEIN HYATT FARBER SCHRECK, LLP
4 5371 Kietzke Lane
5 Reno, NV 89511
6 Telephone: 775.324.4100
7 Facsimile: 775.333.8171

8 Attorneys for Plaintiff
9 JED MARGOLIN

10
11 IN THE FIRST JUDICIAL COURT OF THE STATE OF NEVADA
12
13 IN AND FOR CARSON CITY

14 JED MARGOLIN, an individual,

Case No.: 090C00579 1B

15 Plaintiff,

Dept. No.: 1

16 vs.

**[PROPOSED] ORDER SHORTENING
TIME**

17 OPTIMA TECHNOLOGY
18 CORPORATION, a California corporation,
19 OPTIMA TECHNOLOGY
20 CORPORATION, a Nevada corporation,
21 REZA ZANDIAN aka GOLAMREZA
22 ZANDIANJAZI aka GHOLAM REZA
23 ZANDIAN aka REZA JAZI aka J REZA
24 JAZI aka G. REZA JAZI aka
25 GHONONREZA ZANDIAN JAZI, an
26 individual, DOE Companies 1-10, DOE
27 Corporations 11-20, and DOE Individuals
28 21-30,

Defendants.

29 Having considered Plaintiff Jed Margolin's Ex Parte Motion for an Order Shortening
30 Time in which Defendant REZA ZANDIAN may respond to Plaintiff's Motion for Order to
31 Show Cause Regarding Contempt, finds that good cause exists to grant Plaintiff's ex parte
32 motion.

NOW, THEREFORE, IT HEREBY IS ORDERED as follows:

1. Plaintiff's Ex Parte Motion for Order Shortening Time is granted;

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2. Defendant shall have until January 22, 2016 in which to respond to Plaintiff's Motion for Order to Show Cause Regarding Contempt;

3. Plaintiff may reply to Defendant's response on or before January 26, 2016.

DATED: This _____ day of January, 2016.

DISTRICT JUDGE

Submitted by:
Adam P. McMillen
Brownstein Hyatt Farber Schreck, LLP
5371 Kietzke Lane
Reno, Nevada 89511
(775) 324-4100
Attorneys for Plaintiff

REC'D & FILED

2016 JAN 22 AM 8:28

SUSAN MERRIWETHER
CLERK

[Signature]
DEPUTY

1 Case No.: 09 OC 00579 1B

2 Dept. No.: 1

3
4
5
6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7 IN AND FOR CARSON CITY

8 JED MARGOLIN, an individual,

9 Plaintiff,

10 vs.

ORDER TO SHOW CAUSE

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 comes before this Court on a Motion for Order to Show Cause Regarding
24 Contempt and Ex Parte Motion for Order Shortening Time filed on January 14, 2016.

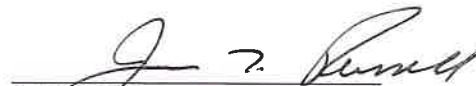
25 The Court has reviewed the Motion and the case file and finds that a hearing regarding this
26 matter would be helpful. Therefore, good cause appearing;

27 IT IS HEREBY ORDERED that a hearing will be held on February 3, 2016, at 9:30 a.m., in
28 Department One of the First Judicial District Court, 885 E. Musser Street, Carson City, Nevada, for
the Defendant to appear to show cause as to why he should not be held in contempt for failure to
comply with the Order of this Court.

///

1 IT IS HEREBY FURTHER ORDERED that Defendant shall produce the ordered documents
2 at the February 3, 2016 hearing.

3 Dated this 22 day of January, 2016.

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5 JAMES T. RUSSELL
6 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 22nd day of January, 2016, 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 Reza Zandian
9 c/o Alborz Zandian
9 9 MacArthur Place, Unit 2105
10 Santa Ana, California 92707-6753

11 Severin A. Carlson, Esq.
12 Tara C. Zimmerman, Esq.
12 510 West Fourth Street
13 Carson City, NV 89703
(Courtesy copy only)

14 

15 _____
16 Angela Jeffries
17 Judicial Assistant, Dept. 1
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1 Adam P. McMillen, Bar No. 10678
2 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

2016 JAN 25 PM 3:13

SUSAN MERRIWETHER
CLERK

BY  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 TAKING DEBTOR'S
EXAMINATION OF
DEFENDANT REZA ZANDIAN**

21 **PLEASE TAKE NOTICE** that on the 24th day of February, 2016, at the hour of 1:30
22 p.m., Plaintiff Jed Margolin, by and through his attorney of record Adam P. McMillen of
23 Brownstein Hyatt Farber Schreck, LLP, will take the Debtor's Examination of Defendant Reza
24 Zandian, at 225 Broadway, Suite 1670, San Diego, California 92101. Said Debtor's Examination
25 shall be taken upon oral examination pursuant to the Nevada Rules of Civil Procedure before a
26 notary public or other official authorized to administer oath and shall continue from day to day
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until completed.

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: January 22, 2016.

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

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775-324-4100


CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 22nd day of January, 2016, I served the foregoing document entitled NOTICE OF TAKING DEBTOR'S EXAMINATION OF DEFENDANT REZA ZANDIAN, 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:

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, California 92707-6753
rezazand@hotmail.com

Severin A. Carlson
Tara C. Zimmerman
Kaempfer Crowell
510 West Fourth Street
Carson City, Nevada 89703

I also caused the foregoing NOTICE OF TAKING DEBTOR'S EXAMINATION OF DEFENDANT REZA ZANDIAN to be served upon Defendant Reza Zandian via email at the email address set forth above.


Employee of Brownstein Hyatt Farber Schreck, LLP

REC'D & FILED

2016 FEB -3 PM 1:11

SUSAN MERRIWETHER
CLERK

BY 
DEPUTY

1 Case No.: 09 OC 00279 1B

2 Dept. No.: 1

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

8
9 JED MARGOLIN, an individual

10 Plaintiff,

11 v.

**ORDER HOLDING DEFENDANT IN
CONTEMPT OF COURT**

12 OPTIMA TECHNOLOGY CORPORATION,
13 A California corporation, OPTIMA
14 TEECHNOLOGY CORPORATION, a Nevada,
15 Corporation, REZA ZANDIAN aka
16 GOLEMREZA ZANDIANJAZI aka
17 GHOLEM REZA ZANDIAN aka REZA JAZI
18 aka J REZA JAZI aka G. REZA JAZI aka
19 GHONOREZA ZANDIAN JAZI, an individual
20 DOE Companies 1-10, DOE Corporations 11-
21 20, and DOE Individuals 21-30,
22 Defendant.

23 This matter is before this Court pursuant to Plaintiff's Motion to Show Cause Regarding
24 Contempt and Ex Parte Motion For Order Shortening Time filed on January 14, 2016.

25 Thereafter, this Court issued an Order to Show Cause on January 22, 2016. A hearing was held
26 on the matter on February 3, 2016. Present on behalf of Plaintiff was Adam McMillen, Esq.

27 Defendant failed to appear.

28 Based on Defendant's failure to comply with this Court's Order and additionally failing
to appear before this Court, Defendant is in contempt of this Court pursuant to NRS 22.010.

1 Therefore, based on the foregoing and good cause appearing,

2 IT IS HEREBY ORDERED that Defendant shall be held in contempt of Court, a bench
3 warrant shall be issued, and the Plaintiff is duly awarded his attorney fees incurred as a result of
4 the contempt.

5 IT IS SO ORDERED.

6 Dated this 31 day of February, 2016.

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9 JAMES T. RUSSELL
10 DISTRICT JUDGE
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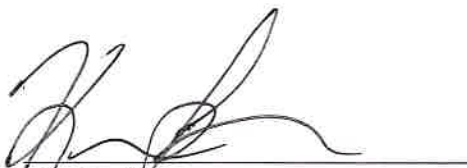
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3 **CERTIFICATE OF MAILING**

4 I hereby certify that on the 4th day of February 2016, I served a copy of the foregoing
5 by placing the foregoing in the United States Mail, postage prepaid, addressed as follows:

6
7 Adam P. McMillen, Esq.
8 5371 Kietzke Lane
9 Reno, NV 89511

10 Reza Zandian
11 c/o Alborz Zandian
12 9 MacArthur Place, Unit 2105
13 Santa Ana, CA 92707-6753

14 Severin Carlson, Esq.
15 Tara Zimmerman, Esq.
16 510 West Fourth Street
17 Carson City, NV 89703
18 (courtesy copy only)



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Krystopher Benyamein, Esq.
Law Clerk, Dept. 1

REC'D & FILED

2016 FEB -3 PM 2:06

SUSAN MERRIWETHER

CLERK

BY Susan Merriwether
DEPUTY

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

JED MARGOLIN, an individual,
Plaintiff,

Case No.: 09 OC 00279 1B

Dept. No.: I

vs.

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

WARRANT OF ARREST

TO THE SHERIFF OF CARSON CITY, NEVADA:

An Order adjudging Defendant in contempt of court and Order Issuing of Arrest Warrant having
been heretofore entered by the Judge of the above-entitled Court.

NOW, THEREFORE, by virtue of this Warrant of Arrest, you are hereby commanded to arrest
the above-named Defendant, and bring him before this Court, pursuant to NRS 22.010; 22.040; 22.050
and 22.100.

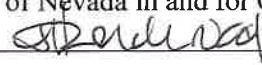
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///

1 That the said Defendant, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM
2 REZA ZANDIAN aka REZA JAZI aka J REZA JAZI aka G. REZA JAZI aka GHONOREZA
3 ZANDIAN JAZI, may be released pending a hearing or by the posting of bail, cash only, in the sum of
4 \$100,000.00. Extradition Nevada/California only.

5 WITNESS my hand this 3rd day of February, 2016, and I direct that this Warrant may be served at
6 any hour of the day or night.

7
8 
DISTRICT COURT

9 ~~SUSAN MERRIMETHOR~~
10 ATTEST: ALAN GLOVER
11 Clerk of the First Judicial District Court of the
12 State of Nevada in and for Carson City
13 By: 
14 Deputy

1 Adam P. McMillen, Bar No. 10678
2 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

RECEIVED
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SEARCHED
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BY *[Signature]*

8 Attorney for Plaintiff JED MARGOLIN

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.

DECLARATION OF ADAM P. MCMILLEN

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

21 I, Adam P. McMillen, do hereby declare and state as follows:

22 1. I am a lawyer at the law firm of Brownstein Hyatt Farber Schreck, LLP, located at
23 5371 Kietzke Lane, Reno, Nevada 89511. This declaration is based upon my personal
24 knowledge, and is made in response to the Court's February 3, 2016 Order Holding Defendant
25 in Contempt of Court.
26
27
28

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775 324-4100

1 2. I am an attorney responsible for the billings in this case. I can authenticate the
2 following information as true and correct. The time and amount billed has been reviewed and
3 edited and the fees and costs charged are reasonable.

4 3. In its February 3, 2016 Order Holding Defendant in Contempt of Court, the Court
5 stated that “Plaintiff is duly awarded his attorney fees incurred as a result of the contempt.” The
6 following is a list of the fees and costs specifically relating to Plaintiff’s Motion for Judgment
7 Debtor Examination. A true and correct copy of a redacted client ledger for the following entries
8 is attached hereto as Exhibit 1. NOTE: Exhibit 1 contains two (2) redacted client ledgers, one
9 from Watson Rounds which reflects services through 8-4-2015; and, another from Brownstein
10 Hyatt Farber Schreck, LLP, which reflects services from 9-1-2015 through the present.

11 4. Between June 4-5, 2015, Matthew Francis, a partner at Watson Rounds (presently
12 Brownstein Hyatt Farber Schreck, LLP) I spent a total of 7.4 hours drafting the Motion for
13 Judgment Debtor Examination. Our hourly rate for this matter is \$300 per-hour. The task
14 necessarily required review of legal authorities, chronicling the discovery dispute for the Court,
15 researching, and compiling exhibits for the Motion. *See* Exhibit 1.

16 5. On June 10-11, 2015, my assistant Nancy Lindsley reviewed the draft Motion for
17 Judgment Debtor Examination and supporting documents, including a proposed Order. Ms.
18 Lindsley transmitted the document for filing and scanned the file-stamped document and
19 transmitted it for review by Plaintiff. Ms. Lindsley spent 1.2 hours on this project. Her hourly
20 rate as a paralegal for this matter is \$125 per-hour. *See* Exhibit 1.

21 6. On June 29, 2015, I spoke to counsel for Defendant Reza Zandian regarding the
22 Motion for Judgment Debtor Examination; and, between July 1-6, 2015 I reviewed Defendant
23 Zandian’s Opposition to Motion for Debtor’s Examination and Motion for Protective Order, I
24 communicated with Plaintiff Jed Margolin regarding my call with Mr. Zandian’s counsel and the
25 Opposition to Motion for Debtor’s Examination and Motion for Protective Order which was filed
26 on behalf of Mr. Zandian. I also reviewed Mr. Margolin’s detailed response to the opposition. I
27 spent a total of 4.8 hours for such services.
28

1 7. Between July 8-21, 2015, I prepared Plaintiff's Reply in support of his Motion for
2 Judgment Debtor's Examination. A total of 14.7 hours of legal services were expended in
3 preparation of such reply.

4 8. On July 20, 2015, Defendant Zandian filed a Reply in support of his Motion for
5 Protective Order. Between July 20, 2015 through August 4, 2015, 3.6 hours of legal services
6 were expended in connection with pursuing Plaintiff's Motion for Judgment Debtor Examination
7 and to Produce Documents, including a Request for Hearing on Plaintiff's motion.

8 9. On September 22, 2015, the Court entered its Order to Set Hearing in this matter.
9 Between September 24, 2015 through November 9, 2015, 12.60 hours of legal services were
10 expended in setting a hearing on Plaintiff's Motion for Judgment Debtor Examination and to
11 Produce Documents, preparing for and attending the hearing in this matter on November 5, 2015
12 and preparing the Order on Motion for Judgment Debtor Examination and to Produce
13 Documents.

14 10. Following the hearing in this matter on November 5, 2015 and entry of the
15 Court's Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents on
16 November 6, 2015, 24.0 hours of legal services have been expended in preparing a Motion for
17 Order to Show Cause Re Contempt and attending an Order to Show Cause hearing on February
18 3, 2016, which resulted in the Court's Order Holding Defendant in Contempt and issuing a
19 Warrant of Arrest for Defendant Reza Zandian.

20 11. As delineated above and in Exhibit 1, a total of 58.61 hours have been expended
21 by Matthew Francis and me, which equates to a grand total of \$17,584.03. Ms. Lindsley spent a
22 total of 20.72 hours of billable work on this project, which equates to a total of \$2,590.00. The
23 grand total of fees requested are therefore \$20,174.03. See Exhibit 1.

24 12. The costs involved with this project equated to \$241.28. The costs requested are
25 therefore \$241.28. See Exhibit 1.

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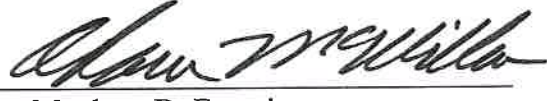
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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

AFFIRMATION PURSUANT TO NRS 239B.030

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

DATED: February 19, 2016. BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: 

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

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775-324-4100


CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **DECLARATION OF ADAM P. MCMILLEN**, addressed as follows:

Reza Zandian
c/o Alborz Zandian
9 MacArthur Place, Unit 2105
Santa Ana, CA 92707-6753

Severin Carlson, Esq.
Tara Zimmerman, Esq.
510 West Fourth Street
Carson City, NV 89703
(courtesy copy only)

Dated: February 19, 2016.



Nancy R. Lindsley

055457\0001\14459314.1

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775-324-4100

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Exhibit 1

Exhibit 1

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	Trust Activity -----			
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	Balance
5457	Margolin, Jed									
A*5457.01	Patent theft analysis & litigation									
REDACTED					Archived: 12/15/2015		Close No: MC0000010090 Resp Lawyer: APM			

Jun 4/2015	Lawyer: APM 2.30 Hrs X 300.00									
1179116	Draft motion to compel debtor's examination				690.00			132467		
Jun 4/2015	Lawyer: APM 0.30 Hrs X 300.00									
1179117	Review and respond to email, dated 6/4/15, from Jed Margolin regarding proceeding with execution on judgment				90.00			132467		
Jun 4/2015	Lawyer: APM 0.10 Hrs X 300.00									
1179118	Draft email to Sev Carlson requesting address for Zandian to have debtor's examination				30.00			132467		
Jun 4/2015	Lawyer: APM 0.70 Hrs X 300.00									
1179120	Research legal basis for taking video-conference deposition of Zandian in Paris, France				210.00			132467		

REDACTED

Date	Received From/Paid To	Chq#	----- General -----		Bld	----- Trust Activity -----				
Entry #	Explanation	Rec#	Repts	Disbs	Fees	Inv#	Acc	Repts	Disbs	Balance

REDACTED

Jun 4/2015	Lawyer: APM 0.10 Hrs X 300.00									
1179127	Review and respond to email, dated 6/4/15, from Jed Margolin regarding motion for debtor's examination				30.00	132467				

REDACTED

Jun 5/2015	Lawyer: APM 1.90 Hrs X 300.00									
1179262	Finish drafting motion for debtor's examination				570.00	132467				

REDACTED

Jun 5/2015	Lawyer: MDF 2.00 Hrs X 300.00									
1180028	Review and revise motion for debtor's examination/Conferences with APM re: same/Research "residence" for debtor's examination issue/Review order for debtor's examination				600.00	132467				

REDACTED

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			Balance
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	

REDACTED

Jun 10/2015 Lawyer: NRL 0.50 Hrs X 125.00
 1180325 Finalize Motion for Debtor's
 Examination and proposed Order
 for filing; transmit via RCMS
 to First Judicial District
 Court; serve opposing counsel
 via U.S. Mail; calendar
 response to motion

62.50 132467

REDACTED

Jun 11/2015 Lawyer: NRL 0.70 Hrs X 125.00
 1180389 Telephone conference with Ace
 Attorney Service regarding
 service of SDT's in
 California; scan filed Motion
 for Judgment Debtor
 Examination and to Produce
 Documents; preparation of
 email to client transmitting
 documents

87.50 132467

REDACTED

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			Balance
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	

REDACTED

Jun 29/2015 Lawyer: APM 0.50 Hrs X 300.00
 1181444 Telephone call with Tara Zimmerman, new attorney for Zandian, regarding her objection to third-party subpoenas, opposition to motion for debtor's examination and question whether or not Margolin is interested in settlement

150.00 132467

REDACTED

Jun 30/2015 Lawyer: NRL 0.70 Hrs X 125.00
 1181613 Download Opposition to Motion for Debtor Judgment Examination; calendar deadline for response; review and

87.50 132467

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			Balance
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	

REDACTED

Jul 1/2015	Lawyer: APM 1.80 Hrs X 300.00				540.00	132960				
1181856	Review Zandian's opposition to motion for debtor's examination, dated 6/29/15									

REDACTED

Jul 1/2015	Lawyer: APM 0.10 Hrs X 300.00				30.00	132960				
1181861	Draft email to Jed Margolin regarding Zandian's opposition to motion for debtor's exam and Tara Zimmerman's conflict of interest issue									

Jul 1/2015	Lawyer: APM 0.10 Hrs X 300.00				30.00	132960				
1181868	Review and respond to email, dated 7/1/15, from Jed Margolin regarding Zandian's opposition to motion for debtor's examination, etc									

REDACTED

Date	Received From/Paid To	Chg#	----- General -----		Fees	Bld	----- Trust Activity -----			Balance
Entry #	Explanation	Rec#	Rcpts	Diabs		Inv#	Acc	Rcpts	Disbs	

REDACTED

Jul 3/2015 1182235	Lawyer: APM 0.30 Hrs X 300.00 Review and respond to email, dated 7/3/15, from Jed Margolin regarding Zandian's opposition to motion for debtor's examination				90.00	132960				
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REDACTED

Jul 6/2015 1182236	Lawyer: APM 0.30 Hrs X 300.00 Finish review of email, dated 7/3/15, from Jed Margolin regarding Zandian's opposition to motion for debtor's examination				90.00	132960				
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Jul 6/2015 1182237	Lawyer: APM 1.40 Hrs X 300.00 Review Jed Margolin's detailed response to opposition to motion for debtor's examination and associated documents				420.00	132960				
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REDACTED

Jul 8/2015 1183040	Lawyer: APM 1.30 Hrs X 300.00 Draft reply in support of motion for debtor's examination				390.00	132960				
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REDACTED

Jul 9/2015 1183111	Lawyer: APM 7.60 Hrs X 300.00 Continue drafting reply in support of motion for debtor's examination and other discovery				2280.00	132960				
Jul 10/2015 1183209	Lawyer: APM 1.90 Hrs X 300.00 Finish drafting reply in				570.00	132960				

3128

Date Entry #	Received From/Paid To Explanation	Chq# Rec#	----- General -----		Fees	Bld Inv#	----- Trust Activity -----		Balance
			Rcpts	Disbs			Rcpts	Disbs	
Jul 10/2015 1183210	support of motion for debtor's examination and discovery Lawyer: APM 0.10 Hrs X 300.00 Review and respond to email, dated 7/10/15, from Jed Margolin regarding reply in support of motion for debtor's examination and discovery				30.00	132960			
Jul 10/2015 1183249	Lawyer: NRL 2.10 Hrs X 125.00 Review/proof Reply iso Motion for Debtor Examination; preparation of list of exhibits; compile exhibits; telephone conference with Reno Carson Messenger Service regarding filing today; duplicate Reply and Exhibits; scan; serve via first class mail				262.50	132960			
Jul 10/2015 1183343	Lawyer: MDF 1.00 Hrs X 300.00 Review and revise Reply in Support of Motion for Debtor Examination/Conferences with Adam re: same				300.00	132960			

REDACTED

Jul 10/2015 1184997	Expense Recovery Photocopies 504 @ 0.25 - Reply/exhibits	17521			126.00	132960			
Jul 10/2015 1185005	Expense Recovery Photocopies 168 @ 0.25 - Reply/exhibits	17521			42.00	132960			
Jul 13/2015 1183436	Lawyer: NRL 0.30 Hrs X 125.00 Calendar reply re Motion for Protective Order and calendar submission of Motion for Debtor's Examination; download file stamped copy of Reply iso Motion for Judgmente Debtor Examination				37.50	132960			

REDACTED

Jul 20/2015 1184153	Lawyer: APM 0.40 Hrs X 300.00 Review file-stamped reply in support of motion for judgment debtor examination				120.00	132960			
------------------------	---	--	--	--	--------	--------	--	--	--

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld	----- Trust Activity -----			Balance
Entry #	Explanation	Rec#	Rcpts	Disbs		Inv#	Acc	Rcpts	Disbs	
REDACTED										
Jul 21/2015	Lawyer: APM 1.00 Hrs X 300.00									
1184200	Review Zandian's reply in support of motion for protective order, dated 7/20/15				300.00	132960				
Jul 21/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184201	Review utility bill for Zandian for his French address, dated 6/25/15				30.00	132960				
Jul 21/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184202	Review French Tax bill, dated 16/15/14, for Zandian				30.00	132960				
Jul 21/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184203	Review 7/4/15 Centre Des Finances Publicques statement for Zandian				30.00	132960				
Jul 21/2015	Lawyer: APM 0.20 Hrs X 300.00									
1184204	Review Iranian passport for Zandian				60.00	132960				
Jul 21/2015	Lawyer: APM 0.30 Hrs X 300.00									
1184205	Review French Autorisation Provisoire De Sejour for Zandian				90.00	132960				
Jul 21/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184206	Draft email to Jed Margolin regarding Zandian's reply in support of motion for protective order				30.00	132960				
Jul 21/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184207	Draft email to Matt Francis regarding Zandian's reply in support of motion for protective order				30.00	132960				
REDACTED										
Jul 21/2015	Lawyer: NRL 0.50 Hrs X 125.00									
1184221	Email to Jed transmitting Reply iso Motion for Judgment Debtor Examination; telephone				62.50	132960				

Date	Received From/Paid To	Chq#	From May/ 1/2015		Fees	Bld	Trust Activity			Balance
			Entry #	Explanation			Rec#	Disbs	Inv#	
Jul 21/2015	Lawyer: NRL 0.50 Hrs X 125.00									
1184222	Review Defendant's Reply iso Motion for Protective Order; scan and save				62.50	132960				
Jul 21/2015	Lawyer: MDF 1.00 Hrs X 300.00									
1184250	Review Zandian's Reply in Support of Motion for Protective Order and emails with APM re: same				300.00	132960				
Jul 22/2015	Lawyer: NRL 0.70 Hrs X 125.00									
1184263	Review local rules re hearing on motions; preparation of draft Request for Hearing on Plaintiff's Motion for Judgment Debtor Examination and to Produce Records				87.50	132960				
Jul 22/2015	Lawyer: NRL 0.20 Hrs X 125.00									
1184267	Finalize Request for Hearing; transmit for filing and service				25.00	132960				
Jul 22/2015	Lawyer: APM 0.30 Hrs X 300.00									
1184273	Draft/revise request for oral argument on motion for debtor's examination				90.00	132960				
Jul 22/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184278	Review email, dated 7/22/15, from Jed Margolin regarding Zandian's reply in support of his motion for protective order				30.00	132960				
Jul 22/2015	Lawyer: APM 0.20 Hrs X 300.00									
1184279	Review Jed Margolin's comments document related to Zandian's reply iso motion for protective order				60.00	132960				
Jul 22/2015	Lawyer: APM 0.10 Hrs X 300.00									
1184280	Draft email to Jed Margolin regarding Zandian's reply iso of motion for protective order				30.00	132960				

REDACTED

Aug 4/2015	Lawyer: APM 0.10 Hrs X 300.00									
1185357	Review file stamped request for hearing on motion for debtor's examination. dated 7/23/15				30.00	136014				

REDACTED

Feb/ 9/2015

Watson Rounds
Client Ledger
From May/ 1/2015

Date	Received From/Paid To	Chq#	----- General -----		Fees	Bld ----- Trust Activity -----			
Entry #	Explanation	Rec#	Rcpts	Disbs	Inv#	Acc	Rcpts	Disbs	Balance
REDACTED									
REDACTED									

2/9/2016 1:11

TIMECARD LISTING

Client: 055457 Jed Margolin

3133

REDACTED

Work Date	Timekeeper Name	Curncy	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount	Ref Curren
REDACTED																		

REDACTED

Work Date	Timekeeper Name	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Billed	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount	Ref Current
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9/24/2015	Nancy R. Lindsley	USD	0.50	125.00	62.50	0.50	125.00	62.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Court's Order to Set Hearing; scan and save; email to client; calendar setting and reminder to contact court to provide contact information	175.00	87.50 USD		175.00	87.50 USD	
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10/7/2015	Nancy R. Lindsley	USD	0.30	125.00	37.50	0.30	125.00	37.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Telephone conference with Judge Russell's administrative assistant to confirm setting of hearing on Motion for Judgment Debtor Examination and to Produce Documents	175.00	52.50 USD		125.00	37.50 USD	
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10/9/2015	Nancy R. Lindsley	USD	0.30	125.00	37.50	0.30	125.00	37.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Hearing Date Memo; confirm calendared; transmit to client via email	175.00	52.50 USD		125.00	37.50 USD	
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Work Date	Timekeeper Name	Time	Rate	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount	Ref Current	
													docket sheet, as filed 10/9/15							

10/20/ 2092	Adam P. McMillen	USD	0.70	300.00	210.00	0.70	300.00	210.00	<input checked="" type="checkbox"/>	055457.000	1	Patent theft analysis and litigation	Telephone conference with J. Margolin re debtor's examination and issues related to executing on the judgment	335.00	234.50 USD	300.00	210.00 USD
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11/4/2 2085	Nancy R. Lindsley	USD	1.70	125.00	212.50	1.70	125.00	212.50	<input checked="" type="checkbox"/>	055457.000	1	Patent theft analysis and litigation	Prepare for hearing on Motion for Judgment Debtor Examination; compile all pleadings and exhibits; create binder for hearing	175.00	297.50 USD	125.00	212.50 USD
11/4/2 2092	Adam P. McMillen	USD	1.30	300.00	390.00	1.30	300.00	390.00	<input checked="" type="checkbox"/>	055457.000	1	Patent theft analysis and litigation	Review motion for debtor's examination in preparation for tomorrow's	335.00	435.50 USD	300.00	390.00 USD

Work Date	Timekeeper Name	Time	Rate	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Billed	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount
11/5/2 2091	Matthew D. Francis	USD	300.0	0.30	300.0	90.00	0.30	300.0	90.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	hearing on same	380.0	114.00 USD	380.0	0	114.00 USD
11/5/2 2092	Adam P. McMillen	USD	300.0	0.50	300.0	150.00	0.50	300.0	150.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Travel to Courthouse for hearing on motion for debtor's examination	335.0	167.50 USD	300.0	0	150.00 USD
11/5/2 2092	Adam P. McMillen	USD	300.0	1.00	300.0	300.00	1.00	300.0	300.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Finish reviewing motion for debtor's examination of Zandian and plan and prepare for argument before Judge Russell today	335.0	335.00 USD	300.0	0	300.00 USD
11/5/2 2092	Adam P. McMillen	USD	300.0	1.20	300.0	360.00	1.20	300.0	360.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Attend hearing on motion for debtor's examination with Judge Russell	335.0	402.00 USD	300.0	0	360.00 USD
11/5/2 2092	Adam P. McMillen	USD	300.0	0.50	300.0	150.00	0.50	300.0	150.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Travel from Courthouse to office after hearing on motion for debtor's examination	335.0	167.50 USD	300.0	0	150.00 USD
11/5/2 2092	Adam P. McMillen	USD	300.0	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re outcome of hearing on motion for debtor's examination	335.0	33.50 USD	300.0	0	30.00 USD
11/6/2 2092	Adam P. McMillen	USD	300.0	0.20	300.0	60.00	0.20	300.0	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to S. Carlson re proposed judgment re debtor's examination	335.0	67.00 USD	300.0	0	60.00 USD
11/6/2 2092	Adam P. McMillen	USD	300.0	0.30	300.0	90.00	0.30	300.0	90.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Revise proposed order re debtor's examination for Zandian	335.0	100.50 USD	300.0	0	90.00 USD
11/6/2 2092	Adam P. McMillen	USD	300.0	0.20	300.0	60.00	0.20	300.0	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Plan and prepare for telephone conference with J. Margolin re plan for moving forward after order received from court re debtor's examination	335.0	67.00 USD	300.0	0	60.00 USD
11/6/2 2092	Adam P. McMillen	USD	300.0	0.80	300.0	240.00	0.80	300.0	240.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Telephone conference with J. Margolin re debtor's examination order from the court and going forward	335.0	268.00 USD	300.0	0	240.00 USD

Work Date	Timekeeper	Curncy	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount
11/6/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 11/6/15, from S. Carlson re proposed order on motion for debtor's examination	335.0	33.50 USD	300.0	0	30.00 USD
11/6/2 2092	Adam P. McMillen	USD	1.30	300.0	390.00	1.30	300.0	390.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft proposed order on motion for debtor's examination	335.0	435.50 USD	300.0	0	390.00 USD
11/6/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 11/6/15, from S. Carlson to A. Jeffries (Judge's assistant) re proposed order re debtor's examination	335.0	33.50 USD	300.0	0	30.00 USD
11/6/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review another email, dated 11/6/15, from S. Carlson re the proposed order re debtor's examination	335.0	33.50 USD	300.0	0	30.00 USD
11/9/2 2085	Nancy R. Lindsley	USD	1.10	125.0	137.50	1.10	125.0	137.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents; calendar deadline; prepare Notice of Entry of Order	175.0	192.50 USD	125.0	0	137.50 USD
11/9/2 2092	Adam P. McMillen	USD	0.20	300.0	60.00	0.20	300.0	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to S. Carlson re settlement and setting up debtor's examination/ deposition of Zandian	335.0	67.00 USD	300.0	0	60.00 USD
11/9/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 11/9/15, from S. Carlson re discovery and settlement issues	335.0	33.50 USD	300.0	0	30.00 USD
11/10/ 2085	Nancy R. Lindsley	USD	0.60	125.0	75.00	0.60	125.0	75.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Prepare Notice of Entry of Order	175.0	105.00 USD	125.0	0	75.00 USD
11/12/ 2085	Nancy R. Lindsley	USD	0.40	125.0	50.00	0.40	125.0	50.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Telephone conference with Court staff regarding obtaining CD of 11/5/2015 hearing; review on-line	175.0	70.00 USD	125.0	0	50.00 USD

Work Date	Timekeeper Name	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount
11/13/ 2015	Nancy R. Lindsley	USD	0.20	125.00	25.00	0.20	125.00	25.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	forms for Public CD Rom Order Form; complete same for transmittal to Court	175.00	35.00 USD		125.00	25.00 USD
11/17/ 2015	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to S. Carlson re debtor's examination	335.00	33.50 USD		300.00	30.00 USD
11/17/ 2015	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re settlement offer and debtor's examination	335.00	33.50 USD		300.00	30.00 USD
11/18/ 2015	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 11/17/15, from S. Carlson re offer to settle this matter and him getting dates for the debtor's examination	335.00	67.00 USD		300.00	60.00 USD
11/18/ 2015	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to S. Carlson re settlement issues	335.00	67.00 USD		300.00	60.00 USD
11/30/ 2015	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review issued remittitur, dated 11/30/15	335.00	67.00 USD		300.00	60.00 USD
12/3/2 2015	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to S. Carlson requesting dates for debtor's examination	335.00	33.50 USD		300.00	30.00 USD
12/7/2 2015	Nancy R. Lindsley	USD	0.50	125.00	62.50	0.50	125.00	62.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Duplicate DVD of 11/5/15 hearing to portable drive; transmit to client	175.00	87.50 USD		175.00	87.50 USD

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Work Date	Timekeeper Name	Currency	Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount	Ref Curren
12/14/2015	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review notice of appeal, dated 12/10/15, re order granting plaintiffs motion for debtor examination and to produce documents	335.00	67.00 USD	USD	335.00	67.00 USD	USD

12/14/2015	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Affidavit of S. Carlson in support of motion to withdraw	335.00	33.50 USD	USD	335.00	33.50 USD	USD
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12/14/2015	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re motion to withdraw and appeal of debtor's examination order	335.00	33.50 USD	USD	335.00	33.50 USD	USD
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12/16/2015	Adam P. McMillen	USD	0.50	300.00	150.00	0.50	300.00	150.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Perform legal research re whether or not the order re debtor's examination is appealable.	335.00	167.50 USD	USD	300.00	150.00 USD	USD
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Work Date	Timekeeper Name	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount	
12/16/2015	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Order granting motion for debtor's examination and to produce documents filed in supreme court on 12/16/15	335.00	33.50 USD	300.00	30.00 USD		

REDACTED

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Work Date	Timek	Timekeep	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	WIP Amount	Bill Number	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount	Ref Curren
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Work Date	Timekeeper Name	Time	Rate	Work Hours	Work Rate	WIP Hours	WIP Rate	WIP Amount	Billable	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount	Ref Current
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1/4/20	2092	Adam P. McMillen	USD	0.10	300.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Perform research re asset searches for Zandian's assets in order to bypass court system re appeal of debtor examination order, if possible	350.00	35.00 USD	300.00	0	30.00 USD	
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REDACTED

1/7/20	2091	Matthew D. Francis	USD	1.00	300.00	1.00	300.00	300.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review challenge to Zandian appeal in NV Supreme Court Order, emails with A. McMillen re contempt issues; review	380.00	380.00 USD	380.00 USD	0	380.00 USD	
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Work Date	Timekeeper Name	Curncy	Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount
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emails with client

1/7/20 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re Supreme Court's order to show cause, dated 1/7/16	350.00	35.00 USD	300.00	0	30.00 USD
1/7/20 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Discuss next steps with M. Francis re motion to contempt for Zandian not producing the documents	350.00	35.00 USD	300.00	0	30.00 USD
1/7/20 2092	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review order to show cause, 1/7/16	350.00	70.00 USD	300.00	0	60.00 USD

REDACTED

1/8/20 2092	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re future motion for order to show cause	350.00	70.00 USD	300.00	0	60.00 USD
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Work Date	Timekeeper	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Std Ref Rate	Ref Amount	Reference Curren
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1/11/12	2092	Adam P. McMillen	USD	0.10	300.00	0	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	1	Patent theft analysis and litigation	Draft email to S. Carlson and T. Zimmerman re amended order to withdraw and request for Zandian's address and notice of impending motion for order to show cause re documents for debtor's examination	350.00	35.00	USD	300.00	0	30.00	USD
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1/11/12	2092	Adam P. McMillen	USD	0.10	300.00	0	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	1	Patent theft analysis and litigation	Review another email, dated 1/11/16, from S. Carlson re confirmation of Zandian's California address	350.00	35.00	USD	300.00	0	30.00	USD
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1/11/12	2092	Adam P. McMillen	USD	0.10	300.00	0	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	1	Patent theft analysis and litigation	Communicate with M. Francis re S. Carlson's representation that he will file affidavit re Zandian's address and filing motion for order to show cause	350.00	35.00	USD	300.00	0	30.00	USD
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Work Date	Timekeeper Name	Currency	Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount
1/11/22 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 1/11/16, from S. Carlson re his intention to file affidavit re Zandian's address	350.00	35.00 USD		300.00	30.00 USD
1/12/22 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re emergency motion for order to show cause for Zandian to produce documents	350.00	35.00 USD		300.00	30.00 USD
1/12/22 2092	Adam P. McMillen	USD	2.30	300.00	690.00	2.30	300.00	690.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft emergency motion for order to show cause why Zandian should not be held in contempt for not producing documents before 12/21/15	350.00	805.00 USD		300.00	690.00 USD
1/12/22 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review filed district court docket entries, 1/11/16	350.00	35.00 USD		300.00	30.00 USD
1/12/22 2092	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, 1/11/16, from J. Margolin re emergency motion for order to show cause why Zandian should not be held in contempt	350.00	70.00 USD		300.00	60.00 USD
1/13/22 2085	Nancy R. Lindsay	USD	0.70	125.00	87.50	0.70	125.00	87.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Prepare draft Request for Submission and proposed Order Shortening Time	175.00	122.50 USD		125.00	87.50 USD
1/13/22 2085	Nancy R. Lindsay	USD	0.80	125.00	100.00	0.80	125.00	100.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review/proof/revise Motion for Order to Show Cause Re Contempt	175.00	140.00 USD		125.00	100.00 USD
1/13/22 2091	Matthew D. Francis	USD	0.50	300.00	150.00	0.50	300.00	150.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review application for contempt, and emails with A. McMillen re same	380.00	190.00 USD		380.00	190.00 USD
1/13/22 2092	Adam P. McMillen	USD	0.30	300.00	90.00	0.30	300.00	90.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Finish drafting motion for order to show cause to hold Zandian in contempt re documents for debtor's examination	350.00	105.00 USD		300.00	90.00 USD
1/13/22 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and	Review email, dated 1/13/16, from J. Margolin	350.00	35.00 USD		300.00	30.00 USD

Work Date	Timekeeper Name	Curncy	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount	Ref Curren
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1/13/2 2092 Adam P. USD 0.50 300.0 150.00 0.50 300.0 150.00 055457.000 Patent theft litigation re motion for order to show cause re documents for debtor's examination

016 McMillen 0 0 0 0 0 0 1 1 Draft email to J. Margolin re motion for order to show cause

350.0 0 175.00 USD 300.0 0 150.00 USD

REDACTED

1/14/2 2092 Adam P. USD 0.10 300.0 30.00 0.10 300.0 30.00 055457.000 Patent theft litigation Review Zandian's French residency permit, attached to S. Carlson's affidavit, dated 1/13/16

016 McMillen 0 0 0 0 0 0 1 1

350.0 0 35.00 USD 300.0 0 30.00 USD

REDACTED

1/14/2 2092 Adam P. USD 0.20 300.0 60.00 0.20 300.0 60.00 055457.000 Patent theft litigation Research Nevada's contempt statutes re potential jailing of Zandian

016 McMillen 0 0 0 0 0 0 1 1

350.0 0 70.00 USD 300.0 0 60.00 USD

REDACTED

Work Date	Timekeeper Name	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount
1/14/2 2092	Adam P. McMillen	USD	0.10	300.0	0	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 1/14/16, from S. Carlson re Zandian's French residency information	350.0	35.00 USD	0	300.0	30.00 USD
1/15/2 2092	Adam P. McMillen	USD	0.10	300.0	0	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review third photograph of Zandian's French residency permits as provided by S. Carlson	350.0	35.00 USD	0	300.0	30.00 USD
1/15/2 2092	Adam P. McMillen	USD	0.20	300.0	0	0.20	300.0	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Zandian's Autorisation Provisoire De Sejour	350.0	70.00 USD	0	300.0	60.00 USD
1/15/2 2092	Adam P. McMillen	USD	0.10	300.0	0	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re Zandian's French residency permit information	350.0	35.00 USD	0	300.0	30.00 USD
1/15/2 2092	Adam P. McMillen	USD	0.10	300.0	0	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review second photograph of Zandian's French residency permit as provided by S. Carlson	350.0	35.00 USD	0	300.0	30.00 USD
1/15/2 2092	Adam P. McMillen	USD	0.10	300.0	0	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 1/14/16, from S. Hascall re Zandian's French residency information	350.0	35.00 USD	0	300.0	30.00 USD
1/21/2 2085	Nancy R. Lindsley	USD	1.20	125.0	0	1.20	125.0	150.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Prepare draft Notice of Taking Deposition; coordinate location with San Diego office; revise Notice per A. McMillen; contact Court Reporter to arrange for reporter for 2/24/2016 debtor examination of R. Zandian	175.0	210.00 USD	0	175.0	210.00 USD
1/21/2 2085	Nancy R. Lindsley	USD	0.20	125.0	0	0.20	125.0	25.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email from Court regarding scheduling Order to Show Cause Hearing; calendar same for 2/3/2016 at 9:30 a.m.	175.0	35.00 USD	0	175.0	35.00 USD
1/21/2 2091	Matthew D. Francis	USD	0.20	300.0	0	0.20	300.0	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review emails from opposing counsel re order to show cause hearing	380.0	76.00 USD	0	380.0	76.00 USD
1/21/2 2092	Adam P.	USD	0.10	300.0	0	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft	Draft email to J. Margolin	350.0	35.00 USD	0	300.0	30.00 USD

Work Date	Timekeeper Name	Curncy	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Review additional emails between S. Carlson and A. Jeffries re S. Carlson no longer representing Zandian	0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	re 2/3/16 hearing on motion for order to show cause	0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Review email, from S. Carlson to A. Jeffries re order to show cause hearing	0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Revise notice of debtor's examination for R. Zandian	0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Review email, dated 1/21/16, from A. Jeffries setting hearing on motion for order to show cause on 2/3/16	0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.60	300.0	180.00	0.60	300.0	180.00	<input checked="" type="checkbox"/>	055457.000	Draft notice of debtor's examination for Zandian in February 2016	350.0	210.00 USD	300.0	0	180.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Draft email to A. Jeffries, Judicial Assistant to Hon. James Russell, re dates for order to show cause hearing	350.0	35.00 USD	300.0	0	30.00 USD
1/21/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Review email, dated 1/21/16, from A. Jeffries, Judicial Assistant to Hon. James Russell, requesting dates for order to show cause hearing	350.0	35.00 USD	300.0	0	30.00 USD
1/22/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Draft email to R. Zandian re show cause hearing	350.0	35.00 USD	300.0	0	30.00 USD
1/22/12 2092 016	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Draft email to J. Margolin	350.0	35.00 USD	300.0	0	30.00 USD

REDACTED

Work Date	Timekeeper Name	Curncy	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount	Reln
1/22/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Finish review of debtor's examination of Zandlian to be sent out today	350.0	35.00 USD	300.0	0	30.00 USD	
1/22/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 1/21/16, from J. Margolin re Court's setting up show cause hearing for Zandlian to produce documents	350.0	35.00 USD	300.0	0	30.00 USD	
1/25/2 2085	Nancy R. Lindsley	USD	0.50	125.0	62.50	0.50	125.0	62.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Order to Show Cause issued by Court; calendar hearing date; scan and save to Worksie; email to A. McMillen	175.0	87.50 USD	175.0	0	87.50 USD	
1/25/2 2091	Matthew D. Francis	USD	0.30	300.0	90.00	0.30	300.0	90.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review order to show cause	380.0	114.00 USD	380.0	0	114.00 USD	
1/25/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re order to show cause	350.0	35.00 USD	300.0	0	30.00 USD	
1/25/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Order to Show Cause, dated 1/22/16	350.0	35.00 USD	300.0	0	30.00 USD	
1/25/2 2092	Adam P. McMillen	USD	0.10	300.0	30.00	0.10	300.0	30.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to R. Zandlian re order to show cause	350.0	35.00 USD	300.0	0	30.00 USD	
1/27/2 2085	Nancy R. Lindsley	USD	0.50	125.0	62.50	0.50	125.0	62.50	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Arrange for travel for A. McMillen for Debtor's Examination in San Diego, CA	175.0	87.50 USD	125.0	0	62.50 USD	
1/27/2 2092	Adam P. McMillen	USD	0.20	300.0	60.00	0.20	300.0	60.00	<input checked="" type="checkbox"/>	055457.000	Patent theft analysis and litigation	Perform research re Zandlian's possible whereabouts	350.0	70.00 USD	300.0	0	60.00 USD	

REDACTED

REDACTED

Work Date	Timekeeper Name	Currency	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Current	Ref Rate	Reference Amount
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2/2/20 2092	Adam P. McMillen	USD	0.10	300.00	30.00	0.10	300.00	30.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review email, dated 2/2/16, from J. Margolin re tomorrow's show cause hearing before Judge Russell	350.00	35.00 USD		300.00	30.00 USD
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2/2/20 2092	Adam P. McMillen	USD	0.30	300.00	90.00	0.30	300.00	90.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Draft email to J. Margolin re tomorrow's show cause hearing before Judge Russell	350.00	105.00 USD		300.00	90.00 USD
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2/2/20 2092	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Appellant's response to order to show cause on appeal case number 69372, dated 2/2/16	350.00	70.00 USD		300.00	60.00 USD
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2/3/20 2085	Nancy R. Lindsay	USD	1.00	125.00	125.00	1.00	125.00	125.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Conf with A. McMillen and M. Francis regarding OSC hearing; review file to obtain passport of Zandian with his date of birth; contact Julie at First Judicial District Court to advise of Zandian's date of birth	175.00	175.00 USD		175.00	175.00 USD
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2/3/20 2091	Matthew D. Francis	USD	0.70	300.00	210.00	0.70	300.00	210.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review Appellant's Response to Order to Show Cause filed in NV Supreme Court; conference with APM re hearing, bench warrant for Zandian and strategy moving forward	380.00	266.00 USD		380.00	266.00 USD
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REDACTED

2/3/20 2092	Adam P. McMillen	USD	0.20	300.00	60.00	0.20	300.00	60.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Review and respond to email, dated 2/3/16, from J. Margolin re today's	350.00	70.00 USD		300.00	60.00 USD
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Work Date	Timekeeper Name	Currency	Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Led	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount
2/3/20 2092	Adam P. McMillen	USD	0.50	300.00	150.00	0.50	300.00	150.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	hearing on order to show cause and Zandlian's bench warrant	350.00	175.00 USD	USD	300.00	150.00 USD
2/3/20 2092	Adam P. McMillen	USD	1.70	300.00	510.00	1.70	300.00	510.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Attend hearing on order to show cause re Zandlian's failure to produce documents re his finances (includes travel time to and from office to Carson City courthouse)	350.00	595.00 USD	USD	300.00	510.00 USD
2/5/20 2085	Nancy R. Lindsay	USD	0.50	125.00	62.50	0.50	125.00	62.50	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	telephone conference with Julie at First Judicial District Court to confirm receipt of message re Zandlian DOB; download filed Docket Entries; calendar reply to response to OSC	175.00	87.50 USD	USD	175.00	87.50 USD
2/5/20 2092	Adam P. McMillen	USD	0.80	300.00	240.00	0.80	300.00	240.00	<input type="checkbox"/>	055457.000	Patent theft analysis and litigation	Telephone conference with J. Margolin re execution of judgment issues including arrest warrant of Zandlian and debtor's examination	350.00	280.00 USD	USD	300.00	240.00 USD

DACTED

REDACTED

Work Date	Timekeeper Name	Curncy	Work Hours	Work Rate	Work Amount	WIP Hours	WIP Rate	WIP Amount	Bill Number	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curren	Ref Rate	Reference Amount	Ref Curren
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Client: 055457 Jed Margolin

REDACTED

Cost Index	Work Date	Cost Type	Currency	Quantity	Rate	Amount	WIP Qty	WIP Rate	WIP Amount	BI	Time	Matter Number	Matter Name	Narrative	Std Rate	Standard Amount	Std Curre	Ref Rate	Reference	Ref Curre
23669	11/13/2015	Service Fee	USD	1.00	36.00	36.00	1.00	36.00	36.00	<input checked="" type="checkbox"/>	2086	055457.00	Patent theft analysis and litigation	Reno/Carson Messenger Service Inc. - Service #70488: Clerk - First Judicial District Court	36.00	36.00 USD	USD	36.00	36.00 USD	USD
23754	12/31/2015	Research	USD	1.00	79.28	79.28	1.00	79.28	79.28	<input checked="" type="checkbox"/>	2086	055457.00	Patent theft analysis and litigation	Thomson Reuters - Account WATSON/ROUNDS, RENO NV/(1000549287) - Date Range: 12/01/15-12/31/15 - Westlaw, WestlawNext	79.28	79.28 USD	USD	79.28	79.28 USD	USD

REDACTED

09 DC 00579 1B

IN THE SUPREME COURT OF THE STATE OF NEVADA

2016 MAR -7 PM 4:37

REZA ZANDIAN, A/K/A GOLAMREZA ZANDIANJAZI, A/K/A GHOLAM REZA ZANDIAN, A/K/A REZA JAZI, A/K/A REZA JAZI, A/K/A G. REZA JAZI, A/K/A GHONOREZA ZANDIAN JAZI, AN INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL, Respondent.

RECD & FILED

TRACIE K. LINDEMAN
CLERK

No. 69372

DEPUTY

FILED

MAR 04 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY S. Young
DEPUTY CLERK

ORDER DISMISSING APPEAL

This is an appeal from an order granting a motion requiring appellant to appear for a debtor's examination and to produce documents. First Judicial District Court, Carson City; James Todd Russell, Judge.

Because it appeared from our preliminary review that no statute or court rule provides for an appeal from an order requiring a debtor's examination or production of documents, we directed appellant to show cause why this appeal should not be dismissed for lack of jurisdiction. See NRAP 3A(b)(1); *Taylor Constr. Co. v. Hilton Hotels*, 100 Nev. 207, 678 P.2d 1152 (1984); see also *Wardleigh v. Second Judicial Dist. Court In & For Cty. of Washoe*, 111 Nev. 345, 351, 891 P.2d 1180, 1184 (1995) (a writ of prohibition will issue to prevent discovery required by court order entered in excess of the court's jurisdiction). Appellant has responded to our order, and respondent has filed a reply.

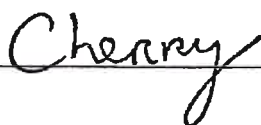
Appellant concedes that no statute or rule specifically provides for an appeal from the order at issue, but argues that the order constitutes a special order after final judgment pursuant to *Gumm v. Mainor*, 118 Nev. 912, 59 P.3d 1220 (2002) because it "affects the Appellant's rights

relative to Respondent's rights to execute the judgment." We disagree. "[T]o be appealable under NRAP 3A(b)(2), a special order after final judgment must be an order affecting the rights of some party to the action, growing out of the judgment previously entered. It must be an order affecting rights incorporated in the judgment." *Id.* at 914, 59 P.3d at 1221; *see also Wilkinson v. Wilkinson*, 73 Nev. 143, 145, 311 P.2d 735, 736 (1957) (the order "must affect the rights of the parties growing out of final judgment."). Any rights respondent has to execute upon the judgment arise out of the final judgment itself, not from the order directing a debtor's examination.

As a result, we conclude that this court lacks jurisdiction over this appeal, and we

ORDER this appeal DISMISSED.¹


_____, J.
Douglas


_____, J.
Cherry


_____, J.
Gibbons

cc: Hon. James Todd Russell, District Judge
Kaempfer Crowell/Reno
Kaempfer Crowell/Carson City
Brownstein Hyatt Farber Schreck, LLP/Reno
Carson City Clerk

¹We deny as moot appellant's counsel's motion to withdraw.

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. 69372
District Court Case No. 09OC005791B

REC'D & FILED
2016 APR 11 PM 2:34
BY SUSAN MERRIWETHER CLERK DEPUTY

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: April 07, 2016

Tracie Lindeman, Clerk of Court

By: Joan Hendricks
Deputy Clerk

cc (without enclosures):

Hon. James Todd Russell, District Judge
Kaempfer Crowell/Reno
Kaempfer Crowell/Carson City
Brownstein Hyatt Farber Schreck, LLP/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 April 11, 2016.

Susan Merriwether
District Court Clerk

By: V. Alegria, Deputy Clerk

IN THE SUPREME COURT OF THE STATE OF NEVADA

REC'D & FILED

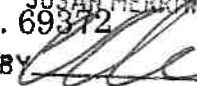
2016 APR 11 PM 2:34

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,

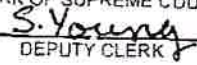
vs.

JED MARGOLIN, AN INDIVIDUAL,
Respondent.

SUSAN MERRIWETHER
No. 69372 CLERK
BY  DEPUTY

FILED

MAR 04 2016

TRACIE K. LINDEMAN
CLERK OF SUPREME COURT
BY  DEPUTY CLERK

ORDER DISMISSING APPEAL

This is an appeal from an order granting a motion requiring appellant to appear for a debtor's examination and to produce documents. First Judicial District Court, Carson City; James Todd Russell, Judge.

Because it appeared from our preliminary review that no statute or court rule provides for an appeal from an order requiring a debtor's examination or production of documents, we directed appellant to show cause why this appeal should not be dismissed for lack of jurisdiction. *See* NRAP 3A(b)(1); *Taylor Constr. Co. v. Hilton Hotels*, 100 Nev. 207, 678 P.2d 1152 (1984); *see also Wardleigh v. Second Judicial Dist. Court In & For Cty. of Washoe*, 111 Nev. 345, 351, 891 P.2d 1180, 1184 (1995) (a writ of prohibition will issue to prevent discovery required by court order entered in excess of the court's jurisdiction). Appellant has responded to our order, and respondent has filed a reply.

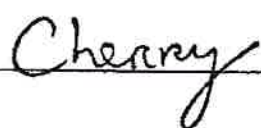
Appellant concedes that no statute or rule specifically provides for an appeal from the order at issue, but argues that the order constitutes a special order after final judgment pursuant to *Gumm v. Mainor*, 118 Nev. 912, 59 P.3d 1220 (2002) because it "affects the Appellant's rights


relative to Respondent's rights to execute the judgment." We disagree. "[T]o be appealable under NRAP 3A(b)(2), a special order after final judgment must be an order affecting the rights of some party to the action, growing out of the judgment previously entered. It must be an order affecting rights incorporated in the judgment." *Id.* at 914, 59 P.3d at 1221; see also *Wilkinson v. Wilkinson*, 73 Nev. 143, 145, 311 P.2d 735, 736 (1957) (the order "must affect the rights of the parties growing out of final judgment."). Any rights respondent has to execute upon the judgment arise out of the final judgment itself, not from the order directing a debtor's examination.

As a result, we conclude that this court lacks jurisdiction over this appeal, and we

ORDER this appeal DISMISSED.¹


_____, J.
Douglas


_____, J.
Cherry


_____, J.
Gibbons

cc: Hon. James Todd Russell, District Judge
Kaempfer Crowell/Reno
Kaempfer Crowell/Carson City
Brownstein Hyatt Farber Schreck, LLP/Reno
Carson City Clerk

¹We deny as moot appellant's counsel's motion to withdraw.

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. 69372
District Court Case No. 09OC005791B

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SUSAN MERRIMETHEN
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BY
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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:

“ORDER this appeal DISMISSED.”

Judgment, as quoted above, entered this 4th day of March, 2016.

IN WITNESS WHEREOF, I have subscribed
my name and affixed the seal of the Supreme
Court at my Office in Carson City, Nevada this
April 07, 2016.

Tracie Lindeman, Supreme Court Clerk

By: Joan Hendricks
Deputy Clerk

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SUSAN MERRIWETHER
CLERK

BY 
DEPUTY

1 Case No. 09 0C 00579 1B

2 Dept. No. I

3
4
5 In The First Judicial District Court of the State of Nevada

6 In and for Carson City

7 JED MARGOLIN, an individual,

8 Plaintiff,

9 vs.

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

21 Defendants.

**ORDER GRANTING PLAINTIFF'S
MOTION FOR DEPOSITION OF
ALBORZ ZANDIAN**

22 On June 24, 2013, this Court entered a Default Judgment against Defendant Reza
23 Zandian in the amount of \$1,495,775.74. On June 27, 2013, notice of entry of the judgment was
24 filed with the Court. On October 19, 2015, the Nevada Supreme Court affirmed this Court's
25 orders denying Defendant Reza Zandian's motion to set aside the default judgment and
26 awarding attorney fees and costs. On November 6, 2015, this Court issued an Order Granting
27 Plaintiff's Motion for Debtor Examination and to Produce Documents, which required
28 Defendant Reza Zandian to produce to Plaintiff's counsel on or before December 21, 2015,
financial documents that would assist Plaintiff in executing on the judgment. This Court's
November 6, 2015 Order also required Defendant Reza Zandian to appear in San Diego,

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1 California, during the month of February 2016 to answer upon oath or affirmation concerning
2 his property at a Judgement Debtor Examination.

3 On January 7, 2016, this Court issued an Amended Order Granting Defendant Reza
4 Zandian's counsel's Motion to Withdraw as Counsel. The Order required Defendant Reza
5 Zandian's counsel to provide a valid address in California and/or Nevada being provided to the
6 Plaintiff for service of any and all documents on Defendant Reza Zandian. Defendant Reza
7 Zandian's counsel provided this Court with an affidavit stating that Reza Zandian's son, Alborz
8 Zandian, lives at and has an address at 9 MacArthur Place, Unit 2105, Santa Ana, California,
9 92707-6753, and this address was provided as an acceptable means of service on Defendant
10 Reza Zandian.

11 On January 22, 2016, this Court issued an Order to Show Cause requiring Defendant
12 Reza Zandian to appear at a hearing before this Court on February 3, 2016 to show cause as to
13 why he should not be held in contempt for failure to comply with the Court's November 6, 2015
14 order and requiring Defendant Reza Zandian to produce the ordered documents at the hearing.

15 A hearing on this matter was held on February 3, 2016. Present on behalf of the Plaintiff
16 was Adam McMillen, Esq. Defendant Reza Zandian failed to appear. Based upon Defendant
17 Reza Zandian's failure to comply with this Court's orders, Defendant Reza Zandian was held in
18 contempt of this Court pursuant to NRS 22.010 and a bench warrant was issued for his arrest
19 and Plaintiff was awarded his attorney fees incurred as a result of the contempt. In addition, at
20 the February 3, 2016 hearing this Court granted Plaintiff's request for a deposition of Defendant
21 Reza Zandian's son, Alborz Zandian, in furtherance of Plaintiff's efforts to execute on the
22 Judgment.

23 The Court finds good cause exists to order the deposition of Alborz Zandian.

24 NOW, THEREFORE, **IT HEREBY IS ORDERED** that Alborz Zandian shall attend
25 and give testimony in this matter in his county of residence in California.

26 DATED: This 3 day of May, 2016.

27
28 
JAMES T. RUSSELL
DISTRICT COURT JUDGE

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

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

JED MARGOLIN, an individual,
Plaintiff,

vs.

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

Case No.: 090000579 1B

Dept. No.: 1

MOTION TO VOID DEEDS,
ASSIGN PROPERTY, FOR WRIT OF
EXECUTION AND TO CONVEY

Plaintiff Jed Margolin ("Plaintiff"), by and through his attorneys of record, hereby files the following Motion to Void Deeds, Assign Property, for Writ of Execution and to Convey:

MEMORANDUM OF POINTS AND AUTHORITIES

I. Introduction

The Complaint and Amended Complaint in this matter are based upon Defendant Reza Zandian's ("Zandian") fraudulent assignment of patents. Shortly after the Court denied Zandian's motion to set aside the default judgment Zandian filed fraudulent deeds in five Nevada counties whereby he transferred his interest in 22 parcels of real property to insiders in

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1 an attempt to avoid execution of the judgment. More recently, Zandian attempted to bribe the
2 undersigned by offering to pay \$30,000 to \$50,000 to the undersigned if the undersigned
3 would resolve this matter without giving any money or consideration to Plaintiff. Zandian has
4 made it clear he will do anything to keep from having to pay the judgment.

5 Plaintiff now moves the Court to void the fraudulent deeds, transfer Zandian's interest
6 in certain Nevada properties to Plaintiff and to order execution on other Nevada property.

7 **II. Procedural Background**

8 As the Court is well aware, Plaintiff filed his original Complaint on December 11,
9 2009. Plaintiff alleged five claims: (1) Conversion, (2) Tortious Interference with Contract,
10 (3) Intentional Interference with Prospective Economic Advantage, (4) Unjust Enrichment,
11 and (5) Unfair and Deceptive Trade Practices. The claims are based upon Zandian's
12 fraudulent assignment of patents. After several motions to dismiss, Zandian filed a General
13 Denial to the Amended Complaint on March 5, 2013. Thereafter, Zandian's counsel withdrew
14 and a Default Judgment was entered against Zandian on June 24, 2013.

15 On December 11, 2013, Plaintiff filed a Motion for Debtor's Examination and to
16 Produce Documents. On December 20, 2013, Zandian filed a Motion to Set Aside the Default
17 Judgment. On January 13, 2014, the Court entered an Order Granting the Motion for Debtor's
18 Examination and to Produce Documents. On February 6, 2014, the Court entered an Order
19 Denying Zandian's Motion to Set Aside the Default Judgment. On March 12, 2014, Zandian
20 filed a Notice of Appeal regarding the Court's Order Denying the Motion to Set Aside the
21 Default Judgment.

22 On June 10, 2015, Plaintiff filed another Motion for Judgment Debtor Examination and
23 to Produce Documents. On October 19, 2015, the Nevada Supreme Court affirmed the Court's
24 orders denying Zandian's motion to set aside the default judgment and awarding fees and
25 costs. On November 6, 2015, the Court entered an Order Granting the Motion for Debtor's
26 Examination and to Produce Documents, whereby Zandian was required to produce
27 documents by December 21, 2015 and to appear for a debtor's examination in February of
28

1 2016. On February 3, 2016, the Court held Zandian in contempt for failing to produce
2 documents as ordered by the Court and issued a warrant for his arrest.

3 On February 24, 2016, pursuant to the Court's November 6, 2015 Order, Plaintiff held
4 the duly noticed debtor's examination of Zandian in San Diego, California. *See* Declaration of
5 Adam McMillen, dated 4/21/16 ("McMillen Declaration"), Exhibit 1. Zandian did not appear
6 for the examination. *See id.* Zandian refused to comply with the Court's orders and has
7 absconded. Plaintiff has been unable to depose Zandian and Zandian has not produced any of
8 the documents ordered by the Court.

9 **III. Pertinent Additional Factual Background**

10 **A. Fraudulent Deeds**

11 On February 6, 2014, the Court entered an Order Denying Zandian's Motion to Set
12 Aside the Default Judgment. Shortly thereafter, Zandian dirtied the title to 22 parcels of real
13 property throughout Nevada, as follows.

14 On March 17, 2014, Zandian recorded a grant deed with Elko County for one parcel,
15 whereby he transferred his interests to Alborz Zandian (his son) and Niloofar Zandian (his
16 wife). *See* McMillen Declaration, Exhibit 2. The deed states the transfer was made pursuant
17 to a "financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003." *Id.* Not
18 only does the timing and parties involved indicate the deed is fraudulent, the parcel in question
19 was purchased after the alleged August 21, 2003 financial agreement on September 25, 2006
20 and the purchase documents do not refer to the alleged "financial agreement." *See* McMillen
21 Declaration, Exhibit 3.

22 On March 18, 2014, Zandian similarly dirtied the titles to three parcels in Churchill
23 County, per the same August 21, 2003 "financial agreement." *See* McMillen Declaration,
24 Exhibits 4-6. All of these parcels were purchased after August 21, 2003 and none of the
25 purchase documents refer to the "financial agreement." *See* McMillen Declaration, Exhibits 7-
26 9.

27 On March 18, 2014, Zandian similarly dirtied the title to one parcel in Washoe County,
28 per the same August 21, 2003 "financial agreement." *See* McMillen Declaration, Exhibit 10.

1 This parcel was also purchased after August 21, 2003 and the purchase documents do not refer
2 to the alleged “financial agreement.” *See* McMillen Declaration, Exhibit 11.

3 Zandian dirtied the title to nine other parcels in Washoe County as well. On March 18,
4 2014, a grant deed was recorded by Zandian, which transferred his interest in nine parcels to
5 Fred Sadri, Ray Koroghli and Sathsowi Thay Koroghli and Alborz Zandian and Niloofar
6 Foughani “per financial agreement entered into in Las Vegas, Nevada and dated 08-21-2003.”
7 *See* McMillen Declaration, Exhibit 12. As background on these nine parcels, on July 31,
8 2003, Niloo Far Foughani (wife of Zandian) released any community property interest in the
9 nine parcels to Zandian, as his separate property. *See* McMillen Declaration, Exhibit 13. On
10 August 1, 2003, these properties were transferred to Zandian, Fred Sadri and Ray Koroghli,
11 with each receiving a one third interest. *See* McMillen Declaration, Exhibit 14. On June 22,
12 2007, John Peter Lee filed a Judgment Confirming Arbitration Award with the Washoe
13 County Recorder, which judgment transferred the interests of Fred Sadri and Ray Koroghli to
14 Zandian for all nine properties. *See* McMillen Declaration, Exhibit 15. This is why the March
15 18, 2014 deed states Zandian transferred the property from Fred Sadri, Ray Koroghli and
16 Sathsowi Thay Koroghli and himself to Fred Sadri, Ray Koroghli and Sathsowi Thay Koroghli
17 and Alborz Zandian and Niloofar Foughani “per financial agreement entered into in Las
18 Vegas, Nevada and dated 08-21-2003.” *See* McMillen Declaration, Exhibit 12.

19 On May 21, 2014, Zandian dirtied the titles to six parcels in Lyon County. *See*
20 McMillen Declaration, Exhibits 16-18. These deeds transferred Zandian’s interests to Alborz
21 Zandian and Niloofar Foughani Zandian “per financial agreement entered into in Las Vegas,
22 Nevada and dated August 21, 2003.” *Id.* However, again, all six parcels were purchased by
23 Zandian after the purported August 21, 2003 “financial agreement.” *See* McMillen
24 Declaration, Exhibits 19-21. None of the purchase documents refer to the alleged “financial
25 agreement.” *Id.* Also, the “financial agreement” has never been produced and is not known to
26 exist.

27 On May 30, 2014, Zandian similarly dirtied the titles to two parcels in Clark County,
28 per the same August 21, 2003 “financial agreement.” *See* McMillen Declaration, Exhibits 22-

1 23. All of these parcels were purchased after August 21, 2003 and none of the purchase
2 documents refer to the alleged “financial agreement.” See McMillen Declaration, Exhibits 24-
3 25.

4 **B. Zandian’s Attempted Bribery**

5 From April 12-19, 2016, Zandian emailed the undersigned. See McMillen Declaration,
6 Exhibit 26. Zandian stated that he wanted to pay (bribe) the undersigned because he believes
7 the undersigned has been “unfairly exploited for 8 years based on a judgment obtained by
8 fraudulent service and address.” *Id.* In response, the undersigned requested a serious offer to
9 settle this matter. *Id.* Zandian stated he did not want me to talk to “anybody” about the
10 ensuing conversation, including Plaintiff, that Plaintiff had been “manipulated by Robert
11 Adams and Sadri” and that he did not wish to pay Plaintiff “a dime” but “I [Zandian] am
12 prepared to pay you [the undersigned] up to \$30,000 cash or \$50,000 within 18 months” to
13 settle this matter outside of Plaintiff’s interests. *Id.*

14 The undersigned told Zandian he represents the interests of Plaintiff and would not
15 accept an offer (bribe) to settle this matter outside of Plaintiff’s interests and requested a
16 serious offer to settle this matter. *Id.* The undersigned also requested to know when Zandian
17 would be in the United States in the near future. *Id.* To which, Zandian stated that a debtor’s
18 examination would be worthless since there is no money to pay the judgment. *Id.* However,
19 Zandian did say that if Plaintiff paid his travel expenses and had the bench warrant vacated,
20 then he would be more than happy to come to the United States, but he did not promise to
21 appear for an examination or to provide the documents previously ordered by the Court. *Id.*

22 The email communications from Zandian show Zandian is well aware of the Court’s
23 orders regarding the debtor’s examination and the ensuing bench warrant for disobeying the
24 Court’s orders. The email communications show Zandian is willing to continue committing
25 fraud upon Plaintiff and the Court and that he has no regard for Plaintiff, the Court or the rule
26 of law.

27 **IV. Argument**

28 **A. Zandian’s Fraudulent Transfers Should Be Declared Void**

1 A “transfer made ... by a debtor is fraudulent as to a creditor ... if the debtor made the
2 transfer ... [w]ith actual intent to hinder, delay or defraud any creditor of the debtor[.]” NRS
3 112.180(1)(a). Actual intent may be determined by considering the following factors as to
4 whether:

- 5 (a) The transfer or obligation was to an insider;
- 6 (b) The debtor retained possession or control of the property transferred
after the transfer;
- 7 (c) The transfer or obligation was disclosed or concealed;
- 8 (d) Before the transfer was made or obligation was incurred, the debtor had
been sued or threatened with suit;
- 9 (e) The transfer was of substantially all the debtor’s assets;
- 10 (f) The debtor absconded;
- 11 (g) The debtor removed or concealed assets;
- 12 (h) The value of the consideration received by the debtor was reasonably
equivalent to the value of the asset transferred or the amount of the obligation
incurred;
- 13 (i) The debtor was insolvent or became insolvent shortly after the transfer
was made or the obligation was incurred;
- 14 (j) The transfer occurred shortly before or shortly after a substantial debt
was incurred; and
- 15 (k) The debtor transferred the essential assets of the business to a lienor
who transferred the assets to an insider of the debtor.

16 NRS 112.180(2)(a-k). Many of the NRS 112.180(2) factors apply to Zandian’s conduct.

17 Zandian recorded fraudulent deeds in five Nevada counties and transferred 22 parcels to
18 insiders, as defined by NRS 112.150(7), shortly after the Court denied Zandian’s motion to set
19 aside the default judgment. Through these insider transfers, Zandian retained control of the
20 properties in question, as partly indicated in his recent emails where he states that the “vacant
21 land in Nevada that I got as sweat equity has no value and I am planning on paying you out of
22 other resources.” *See* McMillen Declaration, Exhibit 26.

23 While the fraudulent deeds were recorded with the county recorders’ offices, the 2003
24 “financial agreement” was not disclosed and remains concealed by Zandian. Also, Zandian
25 has absconded and he refuses to comply with this Court’s orders and refuses to produce
26 documents or to appear for a debtor’s examination and says he is now living in Iran, as
27 opposed to France. *See* McMillen Declaration, Exhibit 26.

1 As a result of the fraudulent transfers, Plaintiff may obtain avoidance of such transfers
 2 “to the extent necessary to satisfy the creditor’s claim.” NRS 112.210(1). “Subject to
 3 applicable principles of equity and in accordance with applicable rules of civil procedure” this
 4 Court may also provide “[a]ny other relief the circumstances may require.” NRS
 5 112.210(1)(c). Accordingly, Plaintiff requests the Court issue an order voiding the transfers
 6 detailed in Section III(A), above.

7 **B. Application Of Property Toward Satisfaction Of Judgment**

8 “All goods, chattels, money and other property, real and personal, of the judgment
 9 debtor, or any interest therein of the judgment debtor not exempt by law, and all property and
 10 rights of property seized and held under attachment in the action, are liable to execution.”
 11 NRS 21.080(1). “The judge or master may order any property of the judgment debtor not
 12 exempt from execution, in the hands of such debtor or any other person, or due to the
 13 judgment debtor, to be applied toward the satisfaction of the judgment.” NRS 21.320; *see also*
 14 NRS 112.210(2) (“If a creditor has obtained a judgment on a claim against the debtor, the
 15 creditor, if the court so orders, may levy execution on the asset transferred or its proceeds.”)
 16 (emphasis added).¹

17 Plaintiff requests the Court order the following property of Zandian, which is not
 18 exempt from execution,² to be applied toward satisfaction of the judgment by ordering the
 19 transfer of Zandian’s interest in the following properties to Plaintiff:

Parcel	acres	Assessed Value (Washoe County Assessor 2016)	Assignment Value
079-150-09	560.0	\$2,822	\$3,200
079-150-13	560.0	\$2,822	\$3,200
084-040-04	640.08	\$3,226	\$3,700

24
 25 ¹ In Nevada, a supplementary proceeding is “incident to the original suit” and “is not an independent proceeding
 26 or the commencement of a new action.” Nevada Direct Ins. Co. v. Fields, No. 66561, 2016 WL 797048, at *3
 27 (Nev. Feb. 26, 2016) (citing State ex rel. Groves v. First Judicial Dist. Court, 61 Nev. 269, 276, 125 P.2d 723,
 28 726 (1942); 30 Am.Jur.2d Executions and Enforcements of Judgments § 584 (2005) (“In jurisdictions where a
 proceeding supplemental is not an independent action, but is merely a proceeding to enforce an earlier
 judgment, proceedings supplemental are conducted in the same court that entered the judgment against the
 defendant, usually under the same cause number. In fact, proceedings supplemental may be filed only in the
 trial court issuing the underlying judgment.” (footnotes omitted))).

² See NRS 21.090; *see also* McMillen Declaration, Exhibit 26.

084-040-06	633.03	\$6,197	\$7,000
084-040-10	390.0	\$1,966	\$2,300
084-140-17	160.0	\$806	\$1,000
Totals	2,943.11	\$17,839	\$20,400

Parcel	acres	Assessed Value (Lyon County Assessor 2016)	Assignment Value
006-052-04	.220	\$15,560	\$5,187
006-052-05	.220	\$15,560	\$5,187
006-052-06	.220	\$15,560	\$5,187
Totals	.66	\$46,680	\$15,561

Parcel	acres	Assessed Value (Churchill County Assessor 2016)	Assignment Value
009-331-04	50.0	\$2,625	\$1,500
Totals	50.0	\$2,625	\$1,500

C. Writ of Execution

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

Plaintiff requests the Court authorize all applicable County Sheriffs or other authorized officers in the State of Nevada to execute the Judgment through the seizure of Zandian's bank accounts, investment accounts, certificates of deposit, annuities, wages, and real and personal property.

Based on the foregoing and the attached Memorandum of Post-Judgment Costs and Fees, attached hereto as Exhibit 2, Plaintiff also hereby requests that the Court direct the Court Clerk to issue the attached proposed Writs of Execution, attached hereto as Exhibit 3, so that the appropriate authorities may assist Plaintiff in executing the Default Judgment against Zandian. If the properties are not enough to satisfy the Judgment, Plaintiff requests the Court order and direct that any further appropriate writs of execution that are provided to the Court Clerk by Plaintiff also be issued, until the Judgment is satisfied.

1 In addition, Plaintiff seeks the following orders with regards to the following parcels in
2 order to protect and satisfy Plaintiff's claim. See NRS 112.210(1)(c)(1) and (3) ("In an action
3 for relief against a transfer or obligation under this chapter, a creditor ... may obtain: ... (1)
4 An injunction against further disposition by the debtor or a transferee, or both, of the asset
5 transferred or of other property; ... or (3) Any other relief the circumstances may require.").

6 Zandian has an interest in two parcels in Lyon County, parcel numbers 015-311-18 and
7 015-311-19. In order to protect Plaintiff's interest and to satisfy his claim, Plaintiff requests
8 the Court order a minimum bid of \$25,000 for each parcel and in the event the minimum bid is
9 not reached for either parcel, that Zandian be ordered not to sell, assign, or divide his interest
10 in either parcel or to allow either or both to be foreclosed upon until the Judgment is paid.

11 Zandian has an interest in parcel 007-151-77 in Churchill County. Plaintiff requests
12 the Court order a minimum bid of \$10,000 for this parcel and in the event the minimum bid is
13 not reached, that Zandian is ordered not to sell, assign, or divide his interest in the parcel or to
14 allow it to be foreclosed upon until the Judgment is paid.

15 Zandian has an interest in parcel 001-660-034 in Elko County. Plaintiff requests the
16 Court order a minimum bid of \$25,000 for this parcel and in the event the minimum bid is not
17 reached, that Zandian is ordered not to sell, assign, or divide his interest in the parcel or to
18 allow it to be foreclosed upon until the Judgment is paid.

19 **D. Conveyance Of Property Sold At Auction**

20 On December 9, 2014, the Clark County Sheriff sold at public auction Zandian's
21 interest in two Clark County parcels. See McMillen Declaration, Exhibits 27-28. As there
22 were no other bidders, Plaintiff credit bid at the auction and purchased both parcels. *Id.* The
23 following is a summary of the auction information for the two parcels:

Clark County	Acres	Bought at auction 12/9/2014	Assessed Value (Clark County Assessor 2016)
APN 071-02-000-013	20.0	\$16,000	\$7,000
APN 071-02-000-005	10.0	\$8,000	\$3,500
Total	30.0	\$24,000	\$10,500

1 On April 3, 2015, the Washoe County Sheriff sold at public auction Zandian's interest
2 in four Washoe County parcels. See McMillen Declaration, Exhibits 29-32. As there were no
3 other bidders, Plaintiff credit bid at the auction and purchased all four parcels. *Id.* The
4 following is a summary of the auction information for the four parcels:

Washoe County	Acres	Bought at auction 4/3/2015	Assessed Value (Washoe County Assessor 2016)
APN 079-150-12	160	\$15,000	\$16,800
APN 079-150-10	639.58	\$5,000	\$3,224
APN 084-040-02	627.24	\$5,000	\$3,161
APN 084-130-07	275.83	\$3,000	\$1,390
Total	1702.65	\$28,000	\$24,575

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10 "Upon a sale of real property, the purchaser shall be substituted to and acquire all the
11 right, title, interest and claim of the judgment debtor thereto." NRS 21.190. Such sales are
12 subject to redemption. *Id.* A judgment debtor or his successor in interest may redeem the
13 property any time within 1 year after the sale. See NRS 21.200 and NRS 21.210. "If no
14 redemption is made within 1 year after the sale, the purchaser, or the purchaser's assignee, is
15 entitled to a conveyance..." NRS 21.220(4).


16 It has been more than 1 year since the above Clark County and Washoe County
17 properties were sold at auction to Plaintiff. The properties have not been redeemed by anyone.
18 Accordingly, Plaintiff requests that the Court order the six properties conveyed to Plaintiff.

19 **V. Conclusion**

20 Based upon the foregoing, Plaintiff respectfully requests this motion be granted in its
21 entirety.

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

24 Dated this 3rd day of May, 2016.

25 BY: 
26 Matthew D. Francis (6978)
27 Adam P. McMillen (10678)
28 5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

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EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION	PAGE(S)
1	Declaration of Adam McMillen	275
2	Consolidated Memorandum of Post-Judgment Fees and Costs	6
3	<i>Proposed</i> Writs of Execution (Lyon, Elko and Churchill Counties)	4

Exhibit 1

Exhibit 1

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

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

8 In and for Carson City

9
10
11 JED MARGOLIN, an individual,
12 Plaintiff,

13 vs.

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

21 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**DECLARATION OF ADAM
MCMILLEN IN SUPPORT OF
MOTION TO VOID DEEDS, ASSIGN
PROPERTY, FOR WRIT OF
EXECUTION AND TO CONVEY**

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

23
24 1. I am counsel of record for Plaintiff Jed Margolin in this matter. This declaration is
25 based upon my personal knowledge and is made in support of the Motion to Void Deeds,
26 Assign Property and for Writ of Execution, filed concurrently herewith.

27 2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of Defendant
28 Reza Zandian's debtor's examination on April 21, 2016 showing his non-appearance

1 3. Attached hereto as Exhibit 2 is a true and correct copy of Elko County Doc# 684351
2 – Grant Deed recorded 03/17/2014, APN: 001-660-034.

3 4. Attached hereto as Exhibit 3 is a true and correct copy of Elko County Doc# 560545
4 – Grant, Bargain and Sale Deed recorded 09/26/2006, APN: 001-660-034.

5 5. Attached hereto as Exhibit 4 is a true and correct copy of Churchill County Doc#
6 439670 – Grant Deed recorded 03/18/2014, APN: 007-151-12.

7 6. Attached hereto as Exhibit 5 is a true and correct copy of Churchill County Doc#
8 439671 – Grant Deed recorded 03/18/2014, APN: 007-151-77.

9 7. Attached hereto as Exhibit 6 is a true and correct copy of Churchill County Doc#
10 439672 – Grant Deed recorded 03/18/2014, APN: 009-33-104.

11 8. Attached hereto as Exhibit 7 is a true and correct copy of Churchill County Doc#
12 383845 – Grant, Bargain and Deed recorded 07/10/2006, APN: 007-151-12.

13 9. Attached hereto as Exhibit 8 is a true and correct copy of Churchill County Doc#
14 384273 – Grant, Bargain and Sale Deed recorded 07/27/2006, APN: 007-151-77.

15 10. Attached hereto as Exhibit 9 is a true and correct copy of Churchill County Doc#
16 372686 – Grant, Bargain and Sale Deed recorded 07/06/2005, APN: 009-33-104.

17 11. Attached hereto as Exhibit 10 is a true and correct copy of Washoe County Doc#
18 4335754– Grant Deed recorded 03/18/2014, APN: 079-150-12.

19 12. Attached hereto as Exhibit 11 is a true and correct copy of Washoe County Doc#
20 3236343– Grant, Bargain and Sale Deed recorded 06/27/2005, APN: 079-150-12.

21 13. Attached hereto as Exhibit 12 is a true and correct copy of Washoe County Doc#
22 4335755– Grant Deed recorded 03/18/2014, APNs: 079-150-09, 070-150-10, 079-150-13,
23 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17.
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1 14. Attached hereto as Exhibit 13 is a true and correct copy of Washoe County Doc#
2 2900593– Grant, Bargain and Sale Deed recorded 08/06/2003, APN: 079-150-09, 079-150-10,
3 079-150-13, 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17.

4 15. Attached hereto as Exhibit 14 is a true and correct copy of Washoe County Doc#
5 2900592– Grant, Bargain and Deed recorded 08/06/2003, APNs: 079-150-09, 079-150-10, 07-
6 150-13, 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17.

7 16. Attached hereto as Exhibit 15 is a true and correct copy of Washoe County Doc#
8 3547263– Judgment Confirming Arbitration Award recorded 06/22/2007.

9 17. Attached hereto as Exhibit 16 is a true and correct copy of Lyon County Doc#
10 521532 – Grant Deed recorded 5/21/2014 – APNs: 006-052-04, 006-052-05 &
11 006-052-06.
12

13 18. Attached hereto as Exhibit 17 is a true and correct copy of Lyon County Doc#
14 521533 – Grant Deed recorded 5/21/2014 – APN: 015-311-02.

15 19. Attached hereto as Exhibit 18 is a true and correct copy of Lyon County Doc#
16 521531 – Grant Deed recorded 5/21/2014, APNs: 015-311-18 & 015-311-19.
17

18 20. Attached hereto as Exhibit 19 is a true and correct copy of Lyon County Doc#
19 342193 – Grant, Bargain and Sale Deed recorded 02/04/2005, APNs: 6-052-04, 6-052-05 & 6-
20 052-06.

21 21. Attached hereto as Exhibit 20 is a true and correct copy of Lyon County Doc#
22 403892 – Grant, Bargain and Sale Deed recorded 04/06/2007, APN: 15-311-02.

23 22. Attached hereto as Exhibit 21 is a true and correct copy of Lyon County Doc#
24 344412 – Grant, Bargain and Sale Deed recorded 03/03/2005, APNs: 15-311-18 &
25 15-311-19.
26

27 23. Attached hereto as Exhibit 22 is a true and correct copy of Clark County Doc#
28 20140530-0001037 – Grant Deed recorded 05/30/2014, APN: 071-02-000-005.

1 24. Attached hereto as Exhibit 23 is a true and correct copy of Clark County Doc#
2 20140530-0001038 – Grant Deed recorded 05/30/2014, APN: 071-02-000-013.

3 25. Attached hereto as Exhibit 24 is a true and correct copy of Clark County Doc#
4 20050419-0004639– Grant, Bargain and Sale Deed recorded 04/19/2005, APN: 071-02-000-
5 005.

6 26. Attached hereto as Exhibit 25 is a true and correct copy of Clark County Doc#
7 20050420-0000563– Grant, Bargain and Sale Deed recorded 04/20/2005, APN: 071-02-000-
8 013.

9 27. Attached hereto as Exhibit 26 is a true and correct copy of an email chain between
10 myself, Adam McMillen, and Reza Zandian, dated April 12-19, 2016.

11 28. Attached hereto as Exhibit 27 is a true and correct copy of the Clark County
12 Sheriff's Certificate of Sale of Real Property for parcel 071-02-000-005, dated 12/30/14.

13 29. Attached hereto as Exhibit 28 is a true and correct copy of the Clark County
14 Sheriff's Certificate of Sale of Real Property for parcel 071-02-000-013, dated 12/30/14.

15 30. Attached hereto as Exhibit 29 is a true and correct copy of the Washoe County
16 Sheriff's Certificate of Sale of Real Property for parcel 079-150-12, dated 4/3/15.

17 31. Attached hereto as Exhibit 30 is a true and correct copy of the Washoe County
18 Sheriff's Certificate of Sale of Real Property for parcel 079-150-10, dated 4/3/15.

19 32. Attached hereto as Exhibit 31 is a true and correct copy of the Washoe County
20 Sheriff's Certificate of Sale of Real Property for parcel 084-040-02, dated 4/3/15.

21 33. Attached hereto as Exhibit 32 is a true and correct copy of the Washoe County
22 Sheriff's Certificate of Sale of Real Property for parcel 084-130-07, dated 4/3/15.

23 I declare under penalty of perjury that the foregoing is true and correct to the best of
24 my knowledge.
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Affirmation Pursuant to NRS 239B.030

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

Dated: May 3, 2016

By: 
ADAM P. MCMILLEN

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRC 5(b), I certify that I am an employee of Watson Rounds, and that on
3 this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true
4 and correct copy of the foregoing document, **DECLARATION OF ADAM MCMILLEN IN**
5 **SUPPORT OF MOTION TO VOID DEEDS, ASSIGN PROPERTY AND FOR WRIT**
6 **OF EXECUTION**, addressed as follows:

7 Reza Zandian
8 c/o Alborz Zandian
9 9 MacArthur Place, Unit 2105
10 Santa Ana, CA 92707-6753
11 and
12 rezazand@hotmail.com

11 Severin A. Carlson
12 Tara C. Zimmerman
13 Kaempfer Crowell
14 50 West Liberty Street, Suite 700
15 Reno, Nevada 89501
16 Former counsel of Reza Zandian

15 Dated: May 3, 2016.

16 
17 Nancy Lindley

	EXHIBIT NO.	<u>EXHIBIT LIST</u> DESCRIPTION	PAGE(S)
1	1	Reporter's Transcript of Proceedings, February 24, 2016 – Certification of Non-Appearance for Debtor's Examination by Reza Zandian	8
2	2	Grant Deed dated March 12, 2014 re Elko County APN: 001-660-034, Document No. 684351	6
3	3	Grant, Bargain and Sale Deed dated September 25, 2006 re Elko County APN: 001-660-034, Document No. 560545	6
4	4	Grant Deed dated March 12, 2014 re Churchill County APN: 007-151-12, Document No. 439670	5
5	5	Grant Deed dated March 12, 2014 re Churchill County APN: 007-151-77, Document No. 439671	4
6	6	Grant Deed dated March 12, 2014 re Churchill County APN: 009-33-104, Document No. 439672	4
7	7	Grant, Bargain and Sale Deed dated 06/27/2006 re Churchill County APN: 007-151-12, Document No. 383845	5
8	8	Grant, Bargain and Sale Deed dated 07/05/2006 re Churchill County APN: 007-151-77, Document No. 384273	4
9	9	Grant, Bargain and Sale Deed dated 06/23/2005 re Churchill County APN: 009-33-104, Document No. 372686	4
10	10	Grant Deed dated March 12, 2014 re Washoe County APN: 079-150-12, Document No. 4335754	3
11	11	Grant, Bargain and Sale Deed dated 06/25/2005 re Washoe County APN: 079-150-12, Document No. 3236343	3
12	12	Grant Deed dated March 12, 2014 re Washoe County APN's: 079-150-09, 079-150-10, 079-151-13, 084-040-02, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-140-17, Document No. 4335755	7
13	13	Grant, Bargain and Sale Deed dated July 31, 2003 re Washoe County APN's: 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	7

1	14	Grant, Bargain and Sale Deed dated August 1, 2003 re Washoe County APN's: 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	8
2			
3	15	Judgment Confirming Arbitration Award, Washoe County Document No. 3547263	120
4			
5	16	Grant Deed, dated May 20, 2014 re Lyon County APN's: 006-052-04, 006-052-05, 006-052-06, Document No. 521532	6
6			
7	17	Grant Deed, dated May 20, 2014 re Lyon County APN: 015-311-02, Document No. 521533	4
8			5
9	18	Grant Deed dated May 20, 2014 re Lyon County APN's: 015-311-18, 015-311-19, Document No. 521531	6
10			
11	19	Grant, Bargain, Sale Deed, dated January 31, 2005 re Lyon County APN's: 6-052-04, 6-052,05, 6-052-06, Document No. 342193	4
12			
13	20	Grant, Bargain and Sale Deed dated 10/25/2006 re Lyon County APN: 15-311-02, Document No. 403892	5
14			
15	21	Grant, Bargain, Sale Deed dated March 1, 2005 re Lyon County APN: 15-311-18, 15-311-19, Document No. 344412	4
16			
17	22	Grant Deed, dated May 20, 2014 re Clark County APN: 071-02-000-005, Document No. 2014530-0001037	4
18			
19	23	Grant Deed, dated May 20, 2014 re Clark County APN: 071-02-000-013, Document No. 20140530-0001038	4
20			
21	24	Grant, Bargain Sale Deed, recorded 04/19/2005 re Clark County APN: 071-02-000-05, Document No. 20050419-0004639	4
22			
23	25	Grant, Bargain, Sale Deed, recorded 4/20/2005 re Clark County APN: 071-02-000-013, Document No. 20050420-0000563	4
24			
25	26	Email from rezazand@hotmail.com (Reza Zandian) to Adam McMillen dated 4/12-19/2016	5
26			
27	27	Sheriff's Certificate of Sale of Real Property recorded 05/18/2015 re Clark County APN: 071-02-000-05, Document No. 2015-0518-0002132	4
28			
	28	Sheriff's Certificate of Sale of Real Property recorded 05/18/2015 re Clark County APN: 071-	4

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02-000-013, Document No. 2015-0518-0002133

29	Certificate of Sale recorded 04/09/2015 re Washoe County APN: 079-150-12, Document No. 4456017	3
30	Certificate of Sale recorded 04/09/2015 re Washoe County APN: 079-150-10, Document No. 4456020	3
31	Certificate of Sale recorded 04/09/2015 re Washoe County APN: 084-040-02, Document No. 4456032	3
32	Certificate of Sale recorded 04/09/2015 re Washoe County APN: 084-130-07, Document No. 4456021	3

Exhibit 1

Exhibit 1

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

JED MARGOLIN, an individual,)	
)	
Plaintiff,)	
)	
vs.)	CASE NO.: 090C00579 1B
)	
OPTIMA TECHNOLOGY CORPORATION, a)	
California corporation, OPTIMA)	
TECHNOLOGY CORPORATION, a Nevada)	
corporation, REZA ZANDIAN aka)	
GOLAMREZA ZANDIANJAZI aka GHOLAM)	
REZA ZANDIAN aka REZA JAZI aka)	
J. REZA JAZI aka G. REZA JAZI aka)	
GHONOREZA ZANDIAN JAZI, an)	
individual, DOES Companies 1-10,)	
DOE Corporations 11-20, and DOE)	
Individuals 21-30,)	
)	
Defendants.)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS
SAN DIEGO, CALIFORNIA
FEBRUARY 24, 2016

REPORTED BY JUDY M. REIERSEN, CSR NO. 7505

Peterson Reporting, Video & Litigation Services

1 APPEARANCES:

2

3 For the Plaintiff JED MARGOLIN
(appearing telephonically):

4 BROWNSTEIN HYATT FARBER & SCHRECK, LLP
5 BY: ADAM P. McMILLEN, ESQ.
6 5371 Kietzke Lane
Reno, Nevada 89511
775.324.4100

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Peterson Reporting, Video & Litigation Services

Peterson Reporting Video & Litigation Services

1		I N D E X	
2		E X H I B I T S	
3	EXHIBIT		MARKED
4	1	Notice of Taken Debtor's Examination of Defendant Reza Zandian, three pages	5
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1 (Exhibit 1 was marked.)

2 MR. McMILLEN: Okay. My name is Adam McMillen.
3 I am counsel for Jed Margolin.

4 This is the time and place for the deposition of
5 Reza Zandian, Z-a-n-d-i-a-n, and attached as Exhibit 1 is
6 the Notice of Taking Debtor's Examination of Defendant
7 Reza Zandian.

8 And in that notice it says, "Please take notice
9 that on the 24th day of February, 2016, at the hour of
10 1:30 p.m., Plaintiff Jed Margolin, by and through his
11 attorney of record Adam McMillen of Brownstein Hyatt
12 Farber & Schreck, LLP, will take the Debtor's Examination
13 of Defendant Reza Zandian, at 225 Broadway, Suite 1670,
14 San Diego, California 92101."

15 We will make a record that Zandian has not
16 appeared for this deposition, and the time right now is
17 1:52 p.m.

18 And that's all for today. Thank you.

19 (Whereupon the proceedings adjourned at
20 1:52 p.m.)

21

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* * *

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25

1 I, JUDY M. REIERSEN, Certified Shorthand Reporter for the
2 State of California, do hereby certify:

3

4 That the foregoing proceedings were reported by me
5 stenographically and later transcribed into typewriting
6 under my direction; that the foregoing is a true record
7 of the proceedings taken at that time.

8

9

10

11 Dated: This _____ day of _____,

12 2016, at San Diego, California.

13

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JUDY M. REIERSEN
CSR No. 7505

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Peterson Reporting, Video & Litigation Services

<p><u>WORD INDEX</u></p> <p>< 0 > 090C00579 1:7 2:7</p> <p>< 1 > 1 4:4 5:1, 5 1:30 5:10 1:51 2:19 1:52 5:17, 19 1-10 1:12 2:12 11-20 1:13 2:13 1670 2:20 5:13 1B 1:7 2:7</p> <p>< 2 > 2016 1:19 2:19 5:9 6:12 21-30 1:13 2:13 225 2:20 5:13 24 1:19 2:19 24th 5:9</p> <p>< 5 > 5 4:4 5371 3:5</p> <p>< 7 > 7505 1:22 6:17 775.324.4100 3:6</p> <p>< 8 > 89511 3:5</p> <p>< 9 > 92101 5:14</p> <p>< A > ADAM 3:4 5:2, 11 adjourned 5:19 aka 1:10, 10, 11, 11, 11, 11 2:10, 10, 11, 11, 11, 11 all 5:18</p> <p>APPEARANCES 3:1 appeared 5:16 appearing 3:3 attached 5:5 attorney 5:11</p> <p>< B ></p>	<p>Broadway 2:20 5:13 BROWNSTEIN 3:4 5:11</p> <p>< C > California 1:9, 18 2:9, 20, 22 5:14 6:2, 12 CARSON 1:3 2:3 CASE 1:7 2:7 Certified 2:21 6:1 certify 6:2 CITY 1:3 2:3 commencing 2:19 Companies 1:12 2:12 CORPORATIO N 1:8, 9, 9, 10 2:8, 9, 9, 10 Corporations 1:13 2:13 counsel 5:3 COURT 1:1 2:1 CSR 1:22 6:17</p> <p>< D > Dated 6:11 day 5:9 6:11 Debtor's 4:4 5:6, 12 Defendant 4:4 5:6, 13 Defendants 1:14 2:14 deposition 5:4, 16 DIEGO 1:18 2:20 5:14 6:12 direction 6:6 DISTRICT 1:1 2:1 DOE 1:13, 13 2:13, 13</p> <p>< E > ESQ 3:4 Examination 4:4 5:6, 12 EXHIBIT 4:3</p>	<p>5:1, 5</p> <p>< F > FARBER 3:4 5:12 FEBRUARY 1:19 2:19 5:9 FIRST 1:1 2:1 foregoing 6:4, 6</p> <p>< G > GHOLAM 1:10 2:10 GHONOREZA 1:12 2:12 GOLAMREZA 1:10 2:10</p> <p>< H > hour 5:9 HYATT 3:4 5:11</p> <p>< I > individual 1:5, 12 2:5, 12 Individuals 1:13 2:13</p> <p>< J > JAZI 1:11, 11, 11, 12 2:11, 11, 11, 12 JED 1:5 2:5 3:1 5:3, 10 JUDICIAL 1:1 2:1 JUDY 1:22 2:21 6:1, 17</p> <p>< K > Kietzke 3:5</p> <p>< L > Lane 3:5 Litigation 1:22 2:22 3:6 4:10 5:22 6:17 LLP 3:4 5:12</p> <p>< M > MARGOLIN 1:5 2:5 3:1 5:3, 10</p>	<p>MARKED 4:3 5:1 McMILLEN 3:4 5:2, 2, 11</p> <p>< N > name 5:2 NEVADA 1:2, 9 2:2, 9 3:5 Notice 4:4 5:6, 8, 8</p> <p>< O > Okay 5:2 OPTIMA 1:8, 9 2:8, 9</p> <p>< P > p.m 2:19 5:10, 17, 19 pages 4:5 Peterson 1:22 2:22 3:6 4:10 5:22 6:17 place 5:4 Plaintiff 1:6 2:6 3:1 5:10 Please 5:8 PROCEEDINGS 1:17 2:18 5:19 6:4, 7</p> <p>< R > record 5:11, 15 6:6 REIERSEN 1:22 2:21 6:1, 17 Reno 3:5 REPORTED 1:22 6:4 Reporter 2:21 6:1 REPORTER'S 1:17 2:18 Reporting 1:22 2:22 3:6 4:10 5:22 6:17 REZA 1:10, 11, 11, 11, 11 2:10, 11, 11, 11, 11 4:5 5:5, 7, 13 right 5:16</p> <p>< S ></p>	<p>SAN 1:18 2:20 5:14 6:12 says 5:8 SCHRECK 3:4 5:12 Services 1:22 2:22 3:6 4:10 5:22 6:17 Shorthand 2:21 6:1 STATE 1:2 2:2, 22 6:2 stenographically 6:5 Suite 2:20 5:13</p> <p>< T > take 5:8, 12 Taken 4:4 6:7 TECHNOLOGY 1:8, 9 2:8, 9 telephonically 3:3 Thank 5:18 three 4:5 time 5:4, 16 6:7 today 5:18 transcribed 6:5 TRANSCRIPT 1:17 2:18 true 6:6 typewriting 6:5</p> <p>< V > Video 1:22 2:22 3:6 4:10 5:22 6:17 vs 1:7 2:7</p> <p>< W > Wednesday 2:19</p> <p>< Z > ZANDIAN 1:10, 11, 12 2:10, 11, 12 4:5 5:5, 7, 13, 15 Z-a-n-d-i-a-n 5:5 ZANDIANJAZI 1:10 2:10</p>
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Exhibit 2

Exhibit 2

DOC # 684351

03/17/2014 10:50 AM

Official Record

Requested By
A+ PARALEGALS INC

Elko County - NV

D. Mike Smiles - Recorder

Page 1 of 4 Fee \$17.00

Recorded By: ST RPT

APN: 001-660-034

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 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-



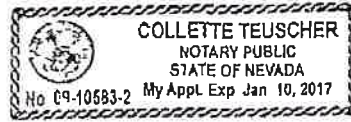
684351

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

08/17/2014
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

02/17/2014
002 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 _____

FOR RECORDERS OPTIONAL USE ONLY	
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 3

Exhibit 3

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: NR RPTT: \$200.10

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 25th 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-
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 Grantees, and to the survivor of them, and to the heirs, successors
and assigns of the survivor of the Grantees, forever.



560545

09/26/2008
008 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.

CG



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
 - 1st installment : \$150.76 Delinquent plus penalties
 - 2nd installment : \$150.75 due October 2, 2006
 - 3rd installment : \$150.75 due January 1, 2007
 - 4th 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

STATE OF NEVADA
DECLARATION OF VALUE

Requested By
STEWART TITLE

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: _____

FOR RECORDED Document

Elko County - NV
Jerry D. Reynolds - Recorder

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

Book: _____
Date of Rec: _____
Notes: _____

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 4

Exhibit 4

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: TR 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-



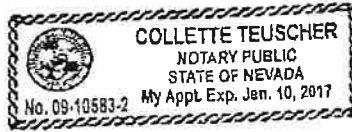
0439670

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"



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 continue 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 30 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.

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)

Exhibit 5

Exhibit 5

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:
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 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, reversionaries or profits thereof.

March 12, 2014


Signature: Reza Zandian

-LOOSE CERTIFICATE ATTACHED-



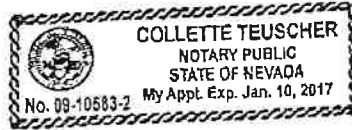
439671

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:	_____
	<u>Grantor = Etal TH</u>

- 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 375.097 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 6

Exhibit 6

DOC # 439672

03/19/2014 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, 12. District 11 M., 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-



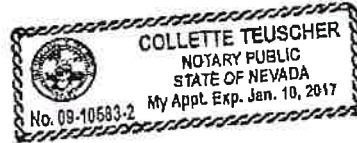
439672

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 = Gral 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 375.098 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 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 _____

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 7

Exhibit 7

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 HORETIO
COUNTY RECORDER
FEE \$16.00 DEPAN

When Recorded Mail To: Mail Tax Statements To:
Reza Zandian and Niloofar Zandian
8775 Costa Verde Blvd #1416
San Diego, CA 92117

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. 1980, 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 730 feet; then 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 770.69 feet to the Southerly 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 655.40 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) _____

383845

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 10 2006	
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 8

Exhibit 8

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
TRINIA MONETTO
COUNTY RECORDER
FEE 15⁰⁰ 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, part of which is hereby acknowledged,

Kent J. Regli and Dawn Regli, 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

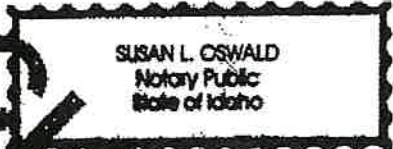
Kent J. Regli
Kent J. Regli
Dawn M. Regli
Dawn Regli

384273

STATE OF Idaho
COUNTY OF CARSON ss.

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) Cond. Townhse
- 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: AUG 27 2009
 Notes: _____

3. Total Value/Sales Price of Property: _____

\$71,900.00

Deed in Lieu of Foreclosure (only if 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. Regli and Dawn Regli

Print Name: Nilcofar Zandian

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)

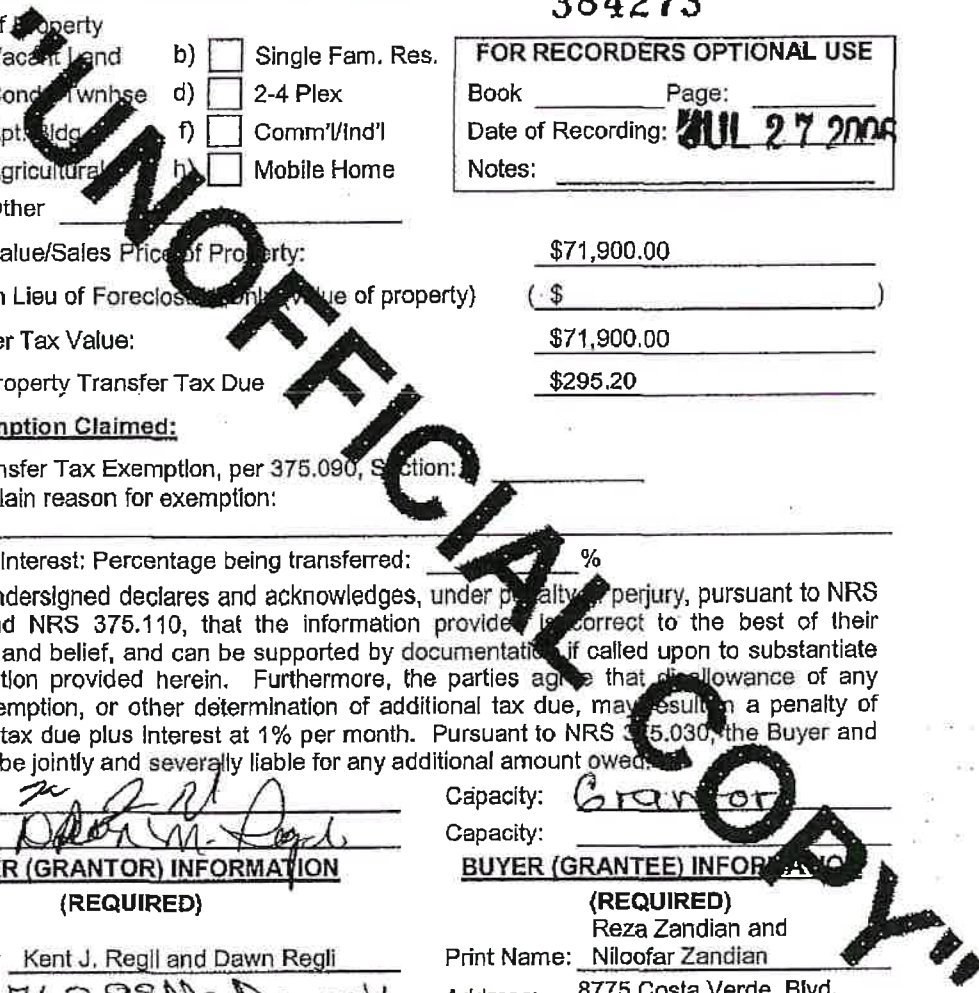


Exhibit 9

Exhibit 9

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

FEES \$00/DEP *[Signature]*

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

UNOFFICIAL COPY

GRANT, BARGAIN and SALE DEED

FOR A VALUABLE CONSIDERATION receipt of which is hereby acknowledged,

Mary E. Yost, an unmarried woman and A. 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 20: 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 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

372686

Mary E. Yost
Mary E. Yost

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

STATE OF NEVADA)
Church) : ss.
COUNTY OF CARSON CI

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: <u>JUL 06 2005</u>	

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

Deed in Lieu of Foreclosure (Optional 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 issuance 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: Mary E. Yost

Signature: [Signature]

Capacity: owner

Capacity: owner

SELLER (GRANTOR) INFORMATION
(REQUIRED)

BUYER (GRANTEE) INFORMATION
(REQUIRED)

Print Name: Mary E. Yost

Address: P.O. Box 1616

City: Fallon

State: NV Zip: 89407

Print Name: Reza Zandian and Niloofar Foughani

Address: 220 Sussex Place

City: Carson City

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)

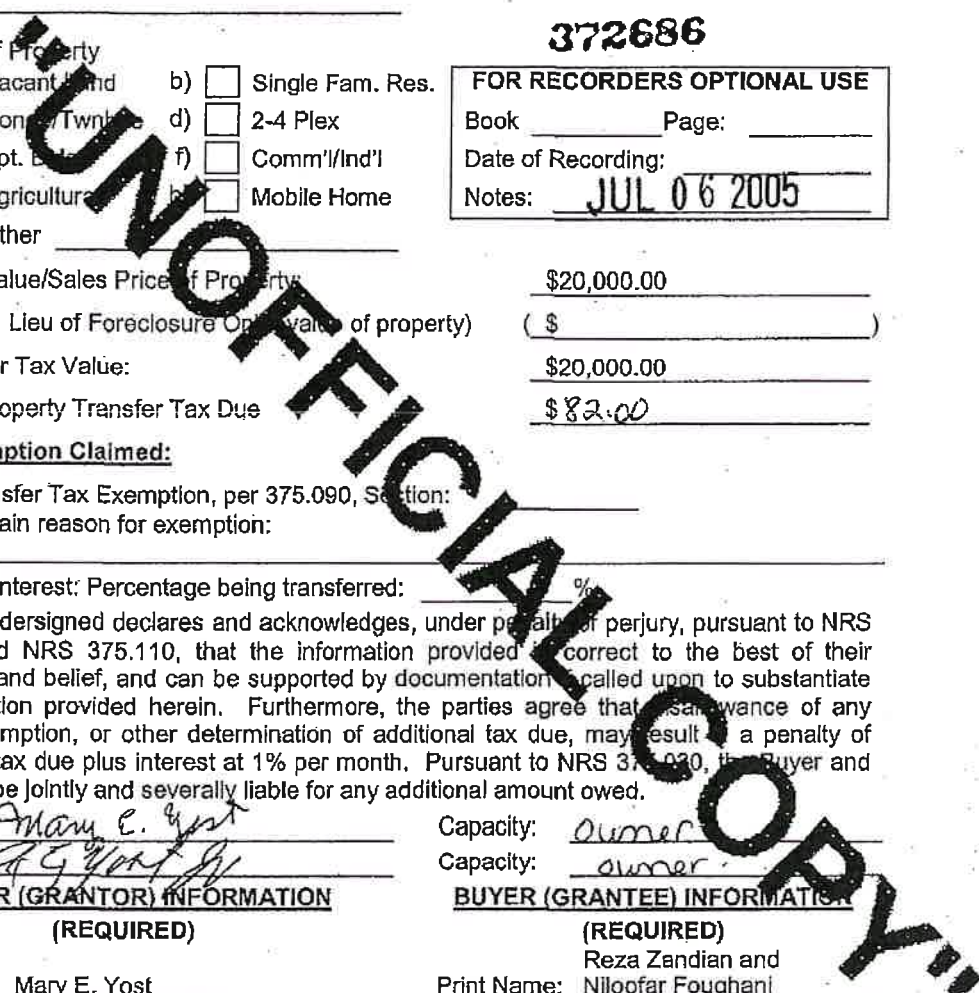


Exhibit 10

Exhibit 10

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

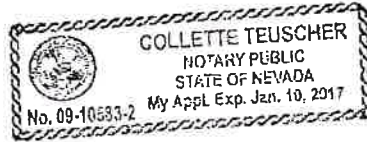

Signature: Reza Zandian

-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 11

Exhibit 11

DOC # 3236343
06/27/2005 10:18A Fee:15.00
BK1
Requested By
FIRST AMERICAN TITLE
Washoe County Recorder
Kathryn L. Burke - Recorder
Pg 1 of 2 RPTT 385.00

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

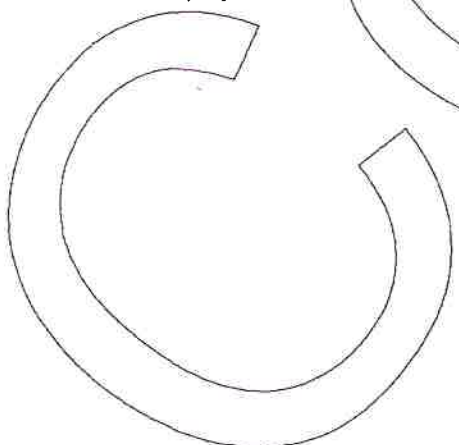
Resa Zandian and Niloofar Foughani, husband and wife as joint tenants with right of survivorship

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

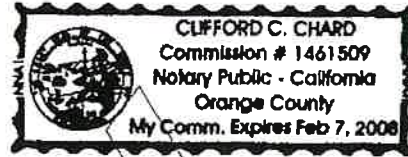


John Clifton
John Clifton

STATE OF ~~NEVADA~~ ^{CALIFORNIA})
: 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
96/27/2005
2 of 2

Exhibit 12

Exhibit 12

DOC # 4335755

03/18/2014 04:28:04 PM

Requested By

A+ PARALEGALS INC

Washoe County Recorder

Lawrence 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:
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, 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 Niloofer 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.

COPOR

Exhibit 13

Exhibit 13

APN: 079-150-09,10,13 084-040-02,04,06,10 084-130-07
RPTT \$#3

0844017

DOC # 2900593
08/05/2003 03:48P Fee: 19.00

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

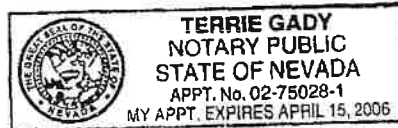




EXHIBIT " A "

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 $\frac{1}{4}$ 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 ¼; South ½ of the Northwest ¼; South ½ 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 ¼ of Section 15, Township 20 North, Range 23 East, M.D.B.&M.

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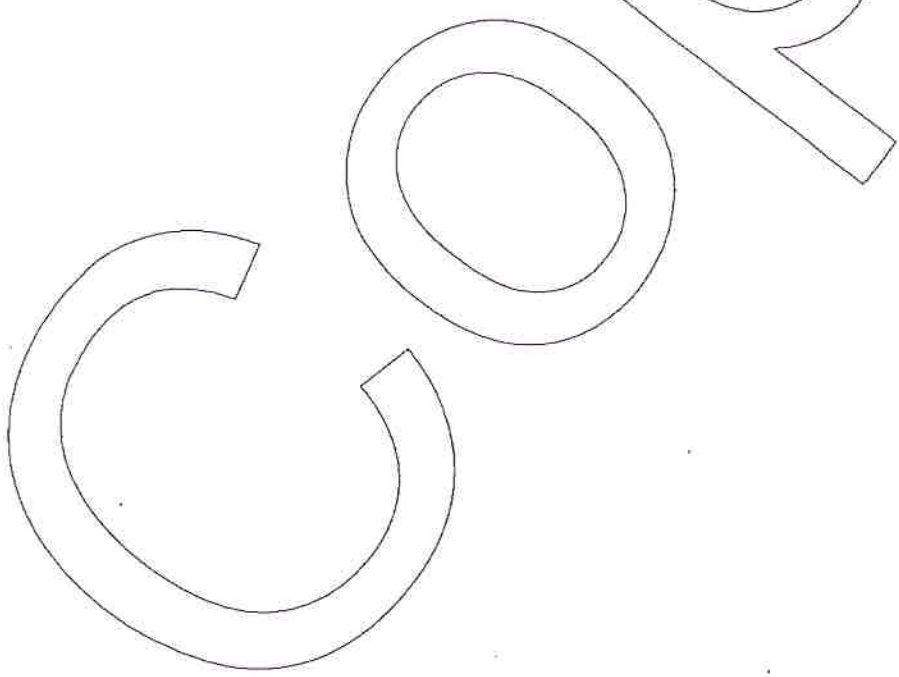


Exhibit 14

Exhibit 14