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8 **IN THE UNITED STATES BANKRUPTCY COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 In Re JAZI GHOLAMREZA ZANDIAN,
11 Debtor.

Case No. BK-N-16-50644-BTB

Adversary No. 17-05016-BTB

12 _____ /
13 FRED SADRI, AS TRUSTEE FOR THE
14 STAR LIVING TRUST, DATED APRIL
15 14, 1997; RAY KOROGHLI AND
SATHSOWI T. KOROGHLI, AS
16 MANAGING TRUSTEES FOR
KOROGHLI MANAGEMENT TRUST,

17 Plaintiffs,

18 v.

19 JED MARGOLIN; JAZI GHOLAMREZA
20 ZANDIAN; and all other parties claiming
an interest in real properties described in
this action,

21 Defendants.

22 _____ /
23 PATRICK CANET,

24 Counterclaimant,

25 v.

26 FRED SADRI, INDIVIDUALLY AND AS
TRUSTEE FOR THE STAR LIVING
27 TRUST; RAY KOROGHLI,
INDIVIDUALLY; RAY KOROGHLI
AND SATHSOWI T. KOROGHLI, AS
28 MANAGING TRUSTEES FOR

1 KOROGHLI MANAGEMENT TRUST,
2 Counter-Defendants.
3 _____ /
4 PATRICK CANET,
5 Cross-Claimant,
6 v.
7 JED MARGOLIN,
8 Cross-Defendant.

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10 **DEFENDANT JED MARGOLIN'S FIRST SET**
11 **OF REQUESTS FOR ADMISSIONS TO PATRICK CANET**

12 Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendant Jed Margolin
13 ("MARGOLIN") hereby requests that Counterclaimant/Cross-Claimant Patrick Canet
14 ("CANET") produce responses pursuant to these Requests within thirty (30) days of service
15 hereof. These Requests are considered continuing and therefore PLAINTIFFS are required to
16 supplement their answers whenever they obtain different or additional knowledge or information
17 relative to these Requests.

18 **I. DEFINITIONS AND GUIDELINES**

19 MARGOLIN incorporates by reference the Definitions and Guidelines contained in his
20 First Set of Interrogatories to Plaintiffs.

21 **II. REQUESTS FOR ADMISSIONS**

22 **REQUEST NO. 1:**

23 Admit that Bank Melli of Iran is a creditor in the FRENCH ACTION that is the basis of
24 Your Chapter 15 Petition.

25 **REQUEST NO. 2:**

26 Admit that Bank Melli's claim in the FRENCH ACTION that is the basis of Your Chapter
27 15 Petition has been approved by the French Court.

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1 **REQUEST NO. 3:**

2 Admit that in the FRENCH ACTION that is the basis of Your Chapter 15 Petition You
3 have already collected at least 150,000 Euros from ZANDIAN.

4 **REQUEST NO. 4:**

5 Admit that from the date the FRENCH ACTION that is the basis of Your Chapter 15
6 Petition was approved by the French Court until You filed Your Chapter 15 Petition in U.S.
7 Bankruptcy Court You failed to make any attempt to collect Your Judgment against ZANDIAN
8 in any action in Nevada against ZANDIAN's assets in Nevada.

9 **REQUEST NO. 5:**

10 Admit that from the date the FRENCH ACTION that is the basis of Your Chapter 15
11 Petition was approved by the French Court until You filed Your Chapter 15 Petition in U.S.
12 Bankruptcy Court You failed to make any attempt to collect Your Judgment against ZANDIAN
13 in any action in California against ZANDIAN's assets in California.

14 **REQUEST NO. 6:**

15 Admit that You failed to record Your Judgment in the FRENCH ACTION against
16 ZANDIAN in any of Nevada's Counties.

17 **REQUEST NO. 7:**

18 Admit that MARGOLIN bought the following properties at public auction more than a
19 year before You filed Your Chapter 15 Petition in U.S. Bankruptcy Court:

- 20 Clark County APN 071-02-000-005
21 Clark County APN 071-02-000-013
22 Washoe County APN 079-150-12
23 Washoe County APN 079-150-10
24 Washoe County APN 084-040-02
25 Washoe County APN 084-130-07

26 **REQUEST NO. 8:**

27 Admit that You filed Your Chapter 15 Petition in U.S. Bankruptcy Court as a result of
28 being contacted by ZANDIAN on or before 2016.

1 **REQUEST NO. 9:**

2 Admit that You have an agreement (either formal or informal, written or oral) with
3 ZANDIAN such that ZANDIAN (or his designee or designees) will receive financial
4 compensation if Your Chapter 15 Petition is successful.

5 **REQUEST NO. 10:**

6 Admit that at the September 6, 2016 hearing in U.S. Bankruptcy Court Your Counsel
7 promised the Court that if Your Chapter 15 Petition were granted, then under Section 1511 Your
8 Counsel would commence either an involuntary proceeding against ZANDIAN under Section
9 303; or if he were to consent to being a debtor under Chapter 7, then Your Counsel would
10 proceed under Section 301.

11 **REQUEST NO. 11:**

12 Admit that it has been more than 12 months since Your Counsel has made the above
13 promise to the Court and Your Counsel has failed to commence either of the above actions.

14 **REQUEST NO. 12:**

15 Admit that Your Counsel also represents ZANDIAN in Your Chapter 15 Petition in U.S.
16 Bankruptcy Court.

17 **REQUEST NO. 13:**

18 Admit that You are not named as a Defendant in this adversary proceeding.

19 **REQUEST NO. 14:**

20 Admit that ZANDIAN is insolvent.

21 **REQUEST NO. 15:**

22 Admit that ZANDIAN is solvent.

23 **REQUEST NO. 16:**

24 Admit that You have presented no evidence that ZANDIAN is or was insolvent.

25 **REQUEST NO. 17:**

26 Admit that ZANDIAN's debt to Bank Melli was incurred for the purpose of ZANDIAN's
27 purchase of an IBM computer that he attempted to export from the United States (through France)
28 to Iran in 1993.

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REQUEST NO. 18:

Admit that You have knowledge that under Executive Order 13599 Bank Melli is considered to be the same entity as the Government of Iran.

REQUEST NO. 19:

Admit that You have knowledge that it is a criminal act under 31 CFR §560 and Executive Order 13599 to pay money to the Government of Iran.

REQUEST NO. 20:

Admit that You have produced all Documents and things pursuant to Defendant Jed Margolin's First Set of Requests for Production to Patrick Canet.

REQUEST NO. 21:

Admit that all Documents and things You have produced pursuant to Defendant Jed Margolin's First Set of Requests for Production to Patrick Canet are authentic.

DATED: This 19th day of January, 2018.

BROWNSTEIN HYATT FARBER SCHRECK, LLP



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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 19th day of January, 2018, I served the document entitled **DEFENDANT JED MARGOLIN'S FIRST SET OF REQUESTS FOR ADMISSION TO PATRICK CANET** on the parties listed below via the following:

VIA FIRST CLASS U.S. 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, addressed as follows:

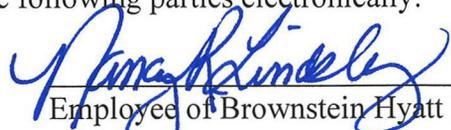
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BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

VIA COURIER: by delivering a copy of the document to a courier service for over-night delivery to the foregoing parties.

VIA ELECTRONIC SERVICE: by electronically filing the document with the Clerk of the Court using the ECF system which served the following parties electronically:


Employee of Brownstein Hyatt Farber
Schreck, LLP