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10 *Attorneys for Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity and as*  
11 *Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli individually; Ray*  
12 *Koroghli and Sathsowi T. Koroghli, as Managing Trustees for Koroghli Management Trust*

13 **UNITED STATES BANKRUPTCY COURT**  
14 **DISTRICT OF NEVADA**

15 In re: JAZI GHOLAMREZA ZANDIAN,  
16  
17 Debtor.

**Case No.: N-16-50644-btb**

**CHAPTER 15**

18 FRED SADRI, AS TRUSTEE FOR THE STAR  
19 LIVING TRUST, DATED APRIL 14, 1997;  
20 RAY KOROGHLI AND SATHSOWI T.  
21 KOROGHLI, AS MANAGING TRUSTEES  
22 FOR KOROGHLI MANAGEMENT TRUST,

**Adv. No. 17-05016-btb**

**FIRST SET OF INTERROGATORIES  
TO JED MARGOLIN**

23 Plaintiffs,

24 vs.

25 JED MARGOLIN; JAZI GHOLAMREZA  
26 ZANDIAN; and all other parties claiming an  
27 interest in real properties described in this  
28 action,

Defendants.

PATRICK CANET,

Counterclaimant,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS  
CAPACITY AS TRUSTEE OF THE STAR  
LIVING TRUST AND RAY KOROGHLI

1 INDIVIDUALLY, AND RAY KOROGHLI  
2 AND SATHSOWI T. KOROGHLI AS  
3 MANAGING TRUSTEES OF THE  
4 KOROGHLI MANAGEMENT TRUST,

5 Counter-Defendants.

6 PATRICK CANET,

7 Cross-Claimant,

8 v.

9 JED MARGOLIN,

10 Cross-Defendant.

11 Pursuant to the Federal Rules of Civil Procedure (F.R.C.P.) Rule 33, Plaintiff/Counter-  
12 Defendants, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust,  
13 dated April 14, 1997; Ray Koroghli individually; Ray Koroghli and Sathsowi T. Koroghli, as  
14 Managing Trustees for Koroghli Management Trust request that Defendant, Jed Margolin  
15 respond to this First Set of Interrogatories within thirty (30) days from the date of service.

16 **DEFINITIONS**

17 **A.** The following definitions apply to this discovery request:

- 18 **1.** Communication. The term “communication” means the transmittal or information (in  
19 the form of facts, ideas, inquiries, or otherwise) and shall embrace and include all  
20 written communications and other communications including without limitation every  
21 discussion, conversation, conference, meeting, interview, telephone call, or doctor,  
22 and any other professional service visit.
- 23 **2.** Concerning. The term “concerning” means relating to, referring to, describing,  
24 evidencing or constituting.
- 25 **3.** YOU, YOUR, and Margolin. As used herein, unless otherwise indicated, the terms  
26 “YOU,” “YOUR” and “Margolin” refer to Defendant Jed Margolin and any and all of  
27 his agents, representatives, employees, partners, and counsels.
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- 4. Document or Documents. The term “Document” or “Documents” is defined to be synonymous in meaning and equal in scope to the use of the terms “document” and “electronically stored information” in Federal Rules of Civil Procedure 26 and 34. A draft or non-identical copy is a separate document within the meaning of this term.
- 5. Identify (with respect to documents). When referring to documents, “identify” means to provide information, to the extent known, as to the (a) type of document; (b) general subject matters; (c) date of the document; (d) author(s), addressee(s) and recipient(s) of the document; and (e) location of the document with sufficient particularity to allow for it to be obtained by means of a request for production for that document.
- 6. Identify (with respect to persons or entities). When referring to a person or entity, “identify” means to provide information, to the extent known, as to the person or entity’s full name, present or last known address, zip code, and telephone number. When referring to a natural person, “identify” also means to provide information as to the last known place of employment, business address, and telephone number. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.
- 7. Parties. The terms “Plaintiff,” “Defendant,” as well as a party’s full or abbreviated name or a pronoun referring to a party means the party and, where applicable, its agents, representatives, officers, directors, employees, partners, corporate parent, subsidiaries, and affiliates.
- 8. Person. The term “Person” is defined as any natural person or business, legal, or governmental entity or association.
- 9. Property. The term “Property” refers to Parcels 2, 4 and 8 as defined under Paragraph 1 in Plaintiffs’ Complaint filed in this action on May 25, 2017 [ECF No.1].

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- 10. Debtor or Zandian.** The terms “Debtor” or “Zandian” refers to Jazi Gholamreza Zandian, the Chapter 15 Debtor in Case No. 16-50644-btb before the U.S. Bankruptcy Court for Nevada.
- 11. Foreign Representative or Canet.** The terms “Foreign Representative” and “Canet” refers to Patrick Canet, in his capacity as Foreign Representative in Case No. 16-50644-btb before the U.S. Bankruptcy Court for Nevada.
- 12. Sheriff or Wood.** The terms “Sheriff” or “Wood” refers to Steven Wood or any other agent of Sheriff, Chuck Allen, conducting sale on behalf of YOU for the Property.
- 13. JCAA.** The abbreviation “JCAA” refers to the Judgment Confirmation Arbitration Award recorded on June 22, 2007 in the official records of Washoe County Recorder’s Office as Instrument Number 3547263.
- 14. Quitclaim Deed.** The term “Quitclaim Deed” refers to the Quitclaim Claim Deed recorded on May 12, 2009 in the official records of Washoe County Recorder’s Office as Instrument Number 3758659.
- 15. Clark Stipulated Judgment.** The term “Clark Stipulated Judgment” refers to the Stipulation for Final Resolution of Litigation recorded on July 20, 2009 in the official records of Clark County Recorder’s Office as Instrument Number 20090720-0003600.
- 16. Washoe Default Judgment.** The term “Washoe Default Judgment” refers to the Default Judgment recorded by YOU on August 16, 2013 in the official records of Washoe County Recorder’s Office as Instrument Number 4269631.
- 17. Clark Default Judgment.** The term “Clark Default Judgment” refers to the Default Judgment recorded by YOU on August 20, 2013 in the official records of Elko County Recorder’s Office as Instrument Number 201308200001370.
- 18. Execution Sale and Auction.** The phrases “Execution Sale” and “Auction” refer to the sale conducted on the Property on or about April 3, 2015 by Steven Wood, as authorized agent for Sheriff, Chuck Allen.





1 **INTERROGATORY NO. 6:**

2 Please identify any and all Documents and/or other forms of communication that were  
3 received by YOU from any other Person(s) not identified under Interrogatories \_ to \_ above or  
4 that were sent by YOU to such Person(s) in connection with the Property prior to or after the  
5 Execution Sale.

6 **INTERROGATORY NO. 7:**

7 Please identify any and all title insurance policies or products obtained by YOU in  
8 connection with the Property.

9 **INTERROGATORY NO. 8:**

10 Please identify any and all title reports obtained by YOU in connection with the Property.

11 **INTERROGATORY NO. 9:**

12 Please describe any research or information obtained by YOU regarding the properties  
13 owned by Zandian (including the Property that is subject to this litigation) in preparation for  
14 recording the Washoe Default Judgment.

15 **INTERROGATORY NO. 10:**

16 Please describe any research or information obtained by YOU regarding the properties  
17 owned by Zandian in preparation for recording the Clark Default Judgment.

18 **INTERROGATORY NO. 11:**

19 Please describe all properties YOU currently own that were bought at judgment execution  
20 sales, whether or not conducted by or on behalf of YOU. Identify the seller, property address,  
21 property A.P.N., purchase price, date of sale, location of sale, and any other persons or entities  
22 that at any time held any interest in the property and describe the respective interests held by  
23 those persons or entities.

24 **INTERROGATORY NO. 12:**

25 Please identify any documents or internal communications that evidence whether any  
26 individual or entity attempted to obtain a judgment payoff from YOU or YOUR agents prior to  
27 the Execution Sale.

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1 **INTERROGATORY NO. 13:**

2 Please identify any documents or internal communications that evidence whether any  
3 individual or entity attempted to obtain information regarding the date, time or location of the  
4 Execution Sale prior to the Execution Sale.

5 **INTERROGATORY NO. 14:**

6 With regard to the Auction, please state the following:

- 7 (a) Identify the opening bid price at the Execution Sale;
- 8 (b) Identify the bidders at the Execution Sale;
- 9 (c) Identify the amounts bid at the Execution Sale;
- 10 (d) Identify any disclosures or announcements made; and
- 11 (e) Describe how the Property was paid for after the Execution Sale.

12 **INTERROGATORY NO. 15:**

13 Please identify any documents or internal communications between YOU and any other  
14 bidders at Execution Sale regarding the title, liens and encumbrances, value of, and/or conditions  
15 of the Property.

16 **INTERROGATORY NO. 16:**

17 Please identify any contract or agreement YOU have with any Person(s) related to the  
18 Property and/or the Execution Sale, including communications concerning the content of such  
19 contract or agreement.

20 **INTERROGATORY NO. 17:**

21 Provide a summary of any income received by YOU related to the Property, including the  
22 date any income was received, the amount of the income, and the source of the income.

23 **INTERROGATORY NO. 18:**

24 Please provide a detailed accounting of any and all payments for taxes, insurance and  
25 assessments made by YOU after the Execution Sale, identifying the amount paid, the date, and  
26 the payee.

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1 **INTERROGATORY NO. 19:**

2 Please identify any notices or disclosures regarding the Property and/or Execution Sale  
3 mailed or published by YOU prior to the Execution Sale.

4 **INTERROGATORY NO. 20:**

5 Review each of YOUR responses to the First Set of Request for Admissions, propounded  
6 upon YOU concurrently with these Interrogatories. For each response to the Request for  
7 Admissions that is not an unqualified admission, state:

8 (a) The number of the request;

9 (b) All facts upon which YOU based YOUR response and/or denial;

10 (c) Identify each Person with personal knowledge of the facts upon which YOU based  
11 YOUR response;

12 (d) Identify each document or writing that supports YOUR response.

13 DATED this 28th day of November, 2017.

14 WRIGHT, FINLAY & ZAK, LLP

15 /s/ Yanxiong Li, Esq.

16 Dana Jonathon Nitz, Esq.

17 Federal Bar No. 0050

18 Yanxiong Li, Esq.

19 Federal Bar No. 12807

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21 Las Vegas, Federal 89117

22 *Attorneys for Plaintiffs/Counter-Defendants, Fred*  
23 *Sadri, both in his individual capacity and as Trustee*  
24 *for The Star Living Trust, dated April 14, 1997; Ray*  
25 *Koroghli individually; Ray Koroghli and Sathsowi*  
26 *T. Koroghli, as Managing Trustees for Koroghli*  
27 *Management Trust*  
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to F.R.C.P. 5(b), I certify that I am an employee of WRIGHT, FINLAY &  
3 ZAK, LLP, and that on this 28th day of November, 2017, I did cause a true copy of **FIRST SET**  
4 **OF INTERROGATORIES TO JED MARGOLIN** to be served by depositing it in U.S. Mail,  
5 postage prepaid, to the addresses below:

6  
7 Matthew D. Francis, Esq..  
8 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
9 5371 Kietzke Lane  
10 Reno, NV 89511  
11 *Attorney for Jed Margolin*

12 Jeffrey L. Hartman, Esq.  
13 HARTMAN & HARTMAN  
14 510 West Plumb Lane, Suite B1  
15 Reno, NV 89509  
16 *Attorney for Patrick Canet, Foreign Representativa*  
17 *and Jazi Gholamreza Zandian*

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/s/ Kelli Wightman  
An Employee of WRIGHT, FINLAY & ZAK, LLP