

1 WRIGHT, FINLAY & ZAK, LLP
2 Dana Jonathon Nitz, Esq.
3 Nevada Bar No. 0050
4 Edgar C. Smith, Esq.
5 Nevada Bar No. 5506
6 Yanxiong Li, Esq.
7 Nevada Bar No. 12807
8 7785 W. Sahara Ave., Suite 200
9 Las Vegas, Nevada 89117
10 (702) 475-7964; Fax: (702) 946-1345
11 yli@wrightlegal.net

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

15 **UNITED STATES BANKRUPTCY COURT**
16 **DISTRICT OF NEVADA**

17 In re: JAZI GHOLAMREZA ZANDIAN,
18
19 Debtor.

Case No.: N-16-50644-btb

CHAPTER 15

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

Adv. No. 17-05016-btb

**PLAINTIFFS' RESPONSES TO
DEFENDANT JED MARGOLIN'S
FIRST SET OF INTERROGATORIES**

25 Plaintiffs,

26 vs.

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

Defendants.

PATRICK CANET,

Counterclaimant,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS

1 CAPACITY AS TRUSTEE OF THE STAR
2 LIVING TRUST AND RAY KOROGHLI
3 INDIVIDUALLY, AND RAY KOROGHLI
4 AND SATHSOWI T. KOROGHLI AS
5 MANAGING TRUSTEES OF THE
6 KOROGHLI MANAGEMENT TRUST,

Counter-Defendants.

7 PATRICK CANET,

Cross-Claimant,

8 v.

9 JED MARGOLIN,

10 Cross-Defendant.
11

12 COME NOW, Plaintiffs/Counter-Defendants, Fred Sadri, as Trustee for The Star Living
13 Trust, dated April 14, 1997 (“SLT”) and Ray Koroghli and Sathsowi T. Koroghli, as Managing
14 Trustees for Koroghli Management Trust (“KMT”) (collectively with SLT, hereinafter as
15 “Plaintiffs”), by and through their counsel, Dana Jonathon Nitz, Esq., and Yanxiong Li, Esq., of
16 the law firm of Wright, Finlay & Zak, LLP, and hereby submit their responses to Defendant Jed
17 Margolin’s (“Margolin”) First Set of Interrogatories.

18 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

19 Plaintiffs’ responses herein to Margolin’s First Set of Interrogatories (the “Responses”)
20 are subject to the following general objections (the “General Objections”). The General
21 Objections may be specifically referred to in the Responses for the purpose of clarity. The
22 failure to specifically incorporate a General Objection, however, should not be construed as a
23 waiver of the General Objections.

24 1. Nothing herein shall be construed as an admission or waiver by Plaintiffs of: (a)
25 their rights respecting admissibility, competency, relevance, privilege, materiality, and
26 authenticity of any information provided in the Responses, any documents identified therein, or
27 the subject matter thereof; (b) their objection due to vagueness, ambiguity, or undue burden; and
28 (c) their rights to object to the use of any information provided in the Responses, any document

1 identified therein, or the subject matter contained in the Responses during a subsequent
2 proceeding, including the trial of this or any other action.

3 2. The Responses are made solely for the purposes of, and in relation to, this
4 litigation.

5 3. Plaintiffs object to the Interrogatories to the extent they seek documents and
6 information protected by the attorney-client privilege and/or seeks the work product of counsel.

7 4. Plaintiffs have not completed: (a) their investigation of facts, witnesses, or
8 documents relating to this case, (b) discovery in this action, (c) their analysis of available data,
9 and (d) their preparations for trial. Thus, although a good faith effort has been made to supply
10 pertinent information where the same has been requested, it is not possible in some instances for
11 unqualified Responses to be made to the Discovery Requests. Further, the Responses are
12 necessarily made without prejudice to Plaintiffs' right to produce evidence of subsequently
13 discovered fact, witnesses, or documents, as well as any new theories or contentions that
14 Plaintiffs may adopt. The Responses are further given without prejudice to Plaintiffs' right to
15 provide information concerning facts, witnesses, or documents omitted by the Responses as a
16 result of oversight, inadvertence, good faith error, or mistake. Plaintiffs have responded to the
17 Interrogatories based on information that is presently available to them and to the best of their
18 knowledge to date. The Responses may include hearsay and other forms of evidence that may
19 be neither reliable nor admissible.

20 Without waiving their General Objections, Plaintiffs respond to the Interrogatories as
21 follows:

22 **INTERROGATORIES**

23 **INTERROGATORY NO. 1:**

24 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
25 Communications between the PLAINTIFFS, or any of them, Relating To MARGOLIN, any
26 court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and
27 any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

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1 **RESPONSE TO INTERROGATORY NO. 1:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and
4 seeks information that is neither relevant nor proportional to the needs of this case. This
5 Interrogatory is also unduly burdensome as it seeks information outside of possession and
6 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary
7 Proceeding.

8 **INTERROGATORY NO. 2:**

9 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
10 Communications between SADRI and RAY KOROGHLI Relating To MARGOLIN, any court
11 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
12 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

13 **RESPONSE TO INTERROGATORY NO. 2:**

14 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
15 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and
16 seeks information that is neither relevant nor proportional to the needs of this case. This
17 Interrogatory is also unduly burdensome as it seeks information outside of possession and
18 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary
19 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and
20 private information regarding individuals who are not named Respondents.

21 **INTERROGATORY NO. 3:**

22 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
23 Communications between SADRI and SATHSOWI T. KOROGHLI Relating To MARGOLIN,
24 any court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN,
25 and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

26 **RESPONSE TO INTERROGATORY NO. 3:**

27 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
28 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and

1 seeks information that is neither relevant nor proportional to the needs of this case. This
2 Interrogatory is also unduly burdensome as it seeks information outside of possession and
3 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary
4 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and
5 private information regarding individuals who is not a named Respondents or who is not a party
6 to this action, the disclosure of which would violate those individuals' or entities'
7 constitutionally protected right to privacy.

8 **INTERROGATORY NO. 4:**

9 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
10 Communications between SADRI and KMT Relating To MARGOLIN, any court judgment
11 MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any lawsuit
12 between MARGOLIN and ZANDIAN, from December 2007 to present.

13 **RESPONSE TO INTERROGATORY NO. 4:**

14 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
15 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and
16 seeks information that is neither relevant nor proportional to the needs of this case. This
17 Interrogatory is also unduly burdensome as it seeks information outside of possession and
18 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary
19 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and
20 private information regarding individuals who is not a named Respondent.

21 **INTERROGATORY NO. 5:**

22 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
23 Communications between RAY KOROGHLI and SATHSOWI T. KOROGHLI Relating To
24 MARGOLIN, and court judgment MARGOLIN has against ZANDIAN, any patent owned by
25 MARGOLIN, and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to
26 present.

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1 **RESPONSE TO INTERROGATORY NO. 5:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and
4 seeks information that is neither relevant nor proportional to the needs of this case. This
5 Interrogatory is also unduly burdensome as it seeks information outside of possession and
6 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary
7 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and
8 private information regarding individuals who is not a named Respondents or who is not a party
9 to this action, the disclosure of which would violate those individuals' or entities'
10 constitutionally protected right to privacy.

11 **INTERROGATORY NO. 6:**

12 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
13 Communications between RAY KOROGHLI and KMT Relating To MARGOLIN, any court
14 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
15 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

16 **RESPONSE TO INTERROGATORY NO. 6:**

17 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
18 grounds that it is compound with discrete subparts (4), overly broad and vague as to scope, and
19 seeks information that is neither relevant nor proportional to the needs of this case. This
20 Interrogatory is also unduly burdensome as it seeks information outside of possession and
21 control of Plaintiffs and that is more than a decade prior to Plaintiffs' filing of this Adversary
22 Proceeding. Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and
23 private information regarding individuals who is not a named Respondent.

24 **INTERROGATORY NO. 7:**

25 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
26 Communications between SATHSOWI T. KOROGHLI and KMT Relating To MARGOLIN,
27 any court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN,
28 and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

1 **RESPONSE TO INTERROGATORY NO. 7:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it is compound with discrete subparts (4) and exceeds the limit under Fed. R. Civ. P.
4 33(a)(1) for number of Interrogatories that may be propounded without leave by three (3)
5 Interrogatories. This Interrogatory is also overly broad and vague as to scope, and seeks
6 information that is neither relevant nor proportional to the needs of this case. This Interrogatory
7 is also unduly burdensome as it seeks information outside of possession and control of Plaintiffs
8 and that is more than a decade prior to Plaintiffs' filing of this Adversary Proceeding.
9 Furthermore, Plaintiffs object to the extent this Interrogatory seeks confidential and private
10 information regarding individuals or entities who are not a party to this action, the disclosure of
11 which would violate those individuals' or entities' constitutionally protected right to privacy.

12 **INTERROGATORY NO. 8:**

13 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
14 Communications between any of the PLAINTIFFS Relating To any purchase or potential
15 purchase of any court judgment MARGOLIN has against ZANDIAN

16 **RESPONSE TO INTERROGATORY NO. 8:**

17 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
18 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
19 may be propounded without leave. This Interrogatory is also vague and ambiguous as to time
20 and scope, overly broad and unduly burdensome. Plaintiffs further object to this Interrogatory to
21 the extent it seeks information that is neither relevant nor proportional to the needs of this case.

22 **INTERROGATORY NO. 9:**

23 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
24 Communications that Relate to ZANDIAN receiving any payment of any money or other
25 consideration from "Pico Holdings."

26 **RESPONSE TO INTERROGATORY NO. 9:**

27 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
28 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that

1 may be propounded without leave. This Interrogatory is also vague and ambiguous as to time
2 and scope, overly broad and unduly burdensome. Plaintiffs further object to this Interrogatory to
3 the extent it seeks information that is neither relevant nor proportional to the needs of this case.

4 **INTERROGATORY NO. 10:**

5 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
6 Communications that Relate to any payment of any money or other consideration from any
7 PLAINTIFF to ZANDIAN.

8 **RESPONSE TO INTERROGATORY NO. 10:**

9 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
10 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
11 may be propounded without leave. This Interrogatory is also vague and ambiguous as to time
12 and scope, overly broad and unduly burdensome. Plaintiffs further object to this Interrogatory to
13 the extent it seeks information that is neither relevant nor proportional to the needs of this case.

14 **INTERROGATORY NO. 11:**

15 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
16 Communications that support Your FIRST CAUSE OF ACTION contained in Your
17 COMPLAINT.

18 **RESPONSE TO INTERROGATORY NO. 11:**

19 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
20 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
21 may be propounded without leave.

22 Without waiving any objections, Plaintiffs respond: Margolin acquired no more than
23 what Zandian held at the time of the execution sales, which was one-third (1/3) undivided
24 interest in the parcels of raw land that the subject of this Adversary Proceeding, and therefore
25 Margolin may claim, at most, a tenancy-in-common interest with the Plaintiffs as to the parcels
26 he executed upon and sold to himself. Plaintiffs is not now, nor ever has been, a party to the
27 underlying action by which Margolin obtained his Default Judgment against Zandian, which
28 provides the authority underlying his execution sales against Zandian's interest. Plaintiffs has

1 never transferred any interest in the subject parcels to Zandian. Plaintiffs are not joint tenants
2 with the Zandian.

3 In addition, Margolin failed to record an affidavit required for a proper judgment abstract
4 under NRS 17.150(4) and failed to otherwise include information required under that statute as
5 part of his Default Judgment. Thus, Margolin never had a valid judgment lien against any of the
6 affected parcels before the execution sales.

7 The proof of these facts is a matter of public record and not subject to reasonable dispute.
8 *See also* documents bates-stamped WFZ1 to WFZ2598 served with Plaintiffs' Initial Disclosures
9 and supplements thereto. Investigation is continuing and this Response will be supplemented if
10 and when appropriate.

11 **INTERROGATORY NO. 12:**

12 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
13 Communications that support Your SECOND CAUSE OF ACTION contained in Your
14 COMPLAINT.

15 **RESPONSE TO INTERROGATORY NO. 12:**

16 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
17 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
18 may be propounded without leave.

19 Without waiving any objections, Plaintiffs respond: *see* Response to Interrogatory No. 11
20 above. Investigation is continuing and this Response will be supplemented if and when
21 appropriate.

22 **INTERROGATORY NO. 13:**

23 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
24 Communications that support Your THIRD CAUSE OF ACTION contained in Your
25 COMPLAINT.

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1 **RESPONSE TO INTERROGATORY NO. 13:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
4 may be propounded without leave.

5 **INTERROGATORY NO. 14:**

6 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
7 Communications that support the PRAYER for relief contained in Your COMPLAINT.

8 **RESPONSE TO INTERROGATORY NO. 14:**

9 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
10 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
11 may be propounded without leave.

12 Without waiving any objections, Plaintiffs respond: see Responses to Interrogatories 11-
13 13 above. Investigation is continuing and this Response will be supplemented if and when
14 appropriate.

15 **INTERROGATORY NO. 15:**

16 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
17 Communications that support paragraph 23 of Your COMPLAINT.

18 **RESPONSE TO INTERROGATORY NO. 15:**

19 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
20 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
21 may be propounded without leave.

22 Without waiving any objections, Plaintiffs respond: see Response to Interrogatory No. 11
23 above. Investigation is continuing and this Response will be supplemented if and when
24 appropriate.

25 **INTERROGATORY NO. 16:**

26 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
27 Communications that support paragraph 24 of Your COMPLAINT.

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1 **RESPONSE TO INTERROGATORY NO. 16:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
4 may be propounded without leave.

5 Without waiving any objections, Plaintiffs respond: NRS 21.130(c) requires *inter alia*
6 Notice of Sale to be served, posted and published as follows (1) personal service or service by
7 registered mail of the Notice of Sale upon each judgment debtor; (2) posting of a similar notice
8 describing the property for 20 days successively in 3 public places of the township or city where
9 property is situated/sold; (3) publication of the Notice of Sale three times, once each week, for 3
10 successive weeks in a newspaper in the county; and (4) recording a copy of the Notice of Sale in
11 the office of the county recorder. In response to Plaintiffs' Requests for Production Nos. 5 and 6,
12 Margolin failed to provide any evidence to show that the Notice of Sale was served, posted,
13 published and recorded in accordance with requirements under subsection (c). Investigation is
14 continuing and this Response will be supplemented if and when appropriate.

15 **INTERROGATORY NO. 17:**

16 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
17 Communications that support paragraph 34 of Your COMPLAINT.

18 **RESPONSE TO INTERROGATORY NO. 17:**

19 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
20 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
21 may be propounded without leave.

22 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
23 and 16 above. Investigation is continuing and this Response will be supplemented if and when
24 appropriate.

25 **INTERROGATORY NO. 18:**

26 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
27 Communications that support paragraph 38 of Your COMPLAINT.

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1 **RESPONSE TO INTERROGATORY NO. 18:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
4 may be propounded without leave.

5 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
6 and 16 above. Further, Plaintiffs never received a copy of the Notice of Sale related to the
7 purported Sheriff's auction of the three parcels of land that is subject to this Adversary
8 Proceeding. Investigation is continuing and this Response will be supplemented if and when
9 appropriate.

10 **INTERROGATORY NO. 19:**

11 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
12 Communications that support paragraph 39 of Your COMPLAINT.

13 **RESPONSE TO INTERROGATORY NO. 19:**

14 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
15 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
16 may be propounded without leave.

17 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
18 and 16 above. Investigation is continuing and this Response will be supplemented if and when
19 appropriate.

20 **INTERROGATORY NO. 20:**

21 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
22 Communications that support paragraph 40 of Your COMPLAINT.

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1 **RESPONSE TO INTERROGATORY NO. 20:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
4 may be propounded without leave.

5 Without waiving any objections, Plaintiffs respond: see Response to Interrogatory 11
6 above. Investigation is continuing and this Response will be supplemented if and when
7 appropriate.

8 **INTERROGATORY NO. 21:**

9 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
10 Communications that support paragraph 43 of Your COMPLAINT.

11 **RESPONSE TO INTERROGATORY NO. 21:**

12 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
13 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
14 may be propounded without leave.

15 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
16 and 16 above. Investigation is continuing and this Response will be supplemented if and when
17 appropriate.

18 **INTERROGATORY NO. 22:**

19 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
20 Communications that support paragraph 44 of Your COMPLAINT.

21 **RESPONSE TO INTERROGATORY NO. 22:**

22 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
23 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
24 may be propounded without leave.

25 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
26 and 16 above. Investigation is continuing and this Response will be supplemented if and when
27 appropriate.

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1 **INTERROGATORY NO. 23:**

2 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
3 Communications that support paragraph 45 of Your COMPLAINT.

4 **RESPONSE TO INTERROGATORY NO. 23:**

5 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
6 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
7 may be propounded without leave.

8 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
9 and 16 above. Investigation is continuing and this Response will be supplemented if and when
10 appropriate.

11 **INTERROGATORY NO. 24:**

12 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
13 Communications that support paragraph 46 of Your COMPLAINT.

14 **RESPONSE TO INTERROGATORY NO. 24:**

15 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
16 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
17 may be propounded without leave.

18 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
19 and 16 above. Investigation is continuing and this Response will be supplemented if and when
20 appropriate.

21 **INTERROGATORY NO. 25:**

22 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
23 Communications that support paragraph 47 of Your COMPLAINT.

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1 **RESPONSE TO INTERROGATORY NO. 25:**

2 In addition to the General Objections, Plaintiffs further object to this Interrogatory on the
3 grounds that it exceeds the limit under Fed. R. Civ. P. 33(a)(1) for number of Interrogatories that
4 may be propounded without leave.

5 Without waiving any objections, Plaintiffs respond: see Response to Interrogatories 11
6 above. Further, between August and October of 2013, Mr. Adam P. McMillen and Ms. Nancy
7 Lindsley of the firm Watson Rounds, which represented Margolin as counsel, met and
8 communicated with Ray Koroghli, Fred Sadri and Elias Abrishami regarding Plaintiffs'
9 ownership interest in the Washoe County parcels that is the subject of this Adversary
10 Proceeding. Investigation is continuing and this Response will be supplemented if and when
11 appropriate.

12
13 DATED this 22nd day of February, 2018.

14 WRIGHT, FINLAY & ZAK, LLP

15
16 /s/ Yanxiong Li, Esq.

Dana Jonathon Nitz, Esq.

Nevada Bar No. 0050

Edgar C. Smith, Esq.

Nevada Bar No. 5506

Yanxiong Li, Esq.

Nevada Bar No. 12807

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Tel: (702) 475-7964

Fax: (702) 946-1345

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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 and Sathsowi T. Koroghli, in their*
26 *individual capacities as well as Managing Trustees*
27 *for Koroghli Management Trust*
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VERIFICATION

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STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

I, Ray Koroghli, solely as Trustee of Koroghli Management Trust, being first duly sworn according to law, deposes and says:

I have read the foregoing **PLAINTIFFS’ RESPONSES TO MARGOLIN’S FIRST SET OF INTERROGATORIES** and know the contents thereof, and that, based on the available sources of information, the same are true to the best of my knowledge, information and belief.

Ray Koroghli, as Trustee of Koroghli Management Trust

SUBSCRIBED and SWORN to before me
this ____ day of _____, 2018.

Notary Public in and for said
County and State

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

I, Fred Sadri, solely as Trustee of Star Living Trust dated April 14, 1997, being first duly sworn according to law, deposes and says:

I have read the foregoing **PLAINTIFFS’ RESPONSES TO MARGOLIN’S FIRST SET OF INTERROGATORIES** and know the contents thereof, and that, based on the available sources of information, the same are true to the best of my knowledge, information and belief.

Fred Sadri, as Trustee of Star Living Trust dated April 14, 1997

SUBSCRIBED and SWORN to before me
this ____ day of _____, 2018.

Notary Public in and for said
County and State

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP, and
3 that service of the foregoing **PLAINTIFFS' RESPONSES TO DEFENDANT JED**
4 **MARGOLIN'S FIRST SET OF INTERROGATORIES** was made on this 22nd day of
5 February, 2018, through the CM/ECF Electronic Filing system, and/or by depositing a true and
6 correct copy in the United States Mail, addressed as follows:

7
8 Adam McMillen, Esq..
9 BROWNSTEIN HYATT FARBER SCHRECK, LLP
10 5371 Kietzke Lane
11 Reno, NV 89511
12 *Attorney for Jed Margolin*

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

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