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10 *Attorneys for Fred Sadri, both in his individual
11 capacity and as Trustee for The Star Living
12 Trust, dated April 14, 1997; Ray Koroghli,
13 individually; and Ray Koroghli and Sathsowi T.
14 Koroghli, in their individual capacities as well
15 as Managing Trustees for Koroghli
16 Management Trust*

11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re: JAZI GHOLAMREZA ZANDIAN,
14 Debtor.

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

Chapter 15

Adversary No.: **17-05016-btb**

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

STANDARD DISCOVERY PLAN

21 Plaintiffs,

22 vs.

23 JED MARGOLIN; JAZI GHOLAMREZA
24 ZANDIAN; and all other parties claiming an
25 interest in real properties described in this
26 action.

27 Defendant.

28 PATRICK CANET,

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Counter-claimant,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS
CAPACITY AS TRUSTEE OF THE STAR
LIVING TRUST AND RAY KOROGHLI
INDIVIDUALLY, AND RAY KOROGHLI
AND SATHSOWI T. KOROGHLI AS
MANAGING TRUSTEES OF THE
KOROGHLI MANAGEMENT TRUST

Counter-defendant.

PATRICK CANET,

Cross-claimant,

vs.

JED MARGOLIN,

Cross-defendant.

1 1. The parties agree to the standard discovery plan. The first defendant answered or
2 otherwise appeared on June 29, 2017. Discovery shall be completed within 180 days, measured
3 from the date the first defendant answered or otherwise appeared. **Discovery will close by**
4 **December 26, 2017.**¹

5 2. Nature of the Case: Quiet Title; Contract.

6 3. Jury Trial: A demand for a jury trial has been made pursuant to Fed. R. Civ. P.
7 38(b), and in conformity with LR 9015, but one or more of the parties does not consent to a jury
8 trial pursuant to 28 U.S.C. § 157(e).

9 4. Additional Pleadings: The Parties do not contemplate any additional pleadings
10 at this time.

11 5. Settlement Conference: Settlement cannot be evaluated prior to additional
12 discovery. The Parties may later request a settlement conference.

13 6. Trial: The case should be ready for trial by February 26, 2018 and should take 1-
14 2 days.

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27 ¹ Parties recognize that the standard discovery period is 120 days after the answer or first
28 appearance by the first defendant, but jointly request an additional 60 days based on the
complexity of issues, claims and defenses pending. Parties otherwise submit this plan in
accordance with limitations under LR 7026.

1 7. All Parties consent to this Court entering final judgment.

2 DATED this 21st day of August, 2017.

DATED this 21st day of August, 2017.

3 **WRIGHT, FINLAY & ZAK, LLP**

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

4
5 /s/ Yanxiong Li, Esq.

/s/ Adam McMillen, Esq.

6 Edgar C. Smith, Esq.

Adam McMillen, Esq.

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12 Attorneys for *Fred Sadri, both in his individual*

13 *capacity and as Trustee for The Star Living*

14 *Trust, dated April 14, 1997; Ray Koroghli,*

15 *individually; and Ray Koroghli and Sathsowi T.*

16 *Koroghli, in their individual capacities as well*

17 *as Managing Trustees for Koroghli*

18 *Management Trust*

19

20 DATED this 21st day of August, 2017.

21 **HARTMAN & HARTMAN**

22

23 /s/ Jeffrey L. Hartman, Esq.

24 Jeffrey L. Hartman, Esq.

25 Nevada Bar No. 1607

26 510 W. Plumb Ln., Ste. B

27 Reno, Nevada 89509

28 Attorneys for *Patrick Canet*

CERTIFICATE OF SERVICE

I, Kelli Wightman, am an employee of Wright, Finlay & Zak, LLP and I certify under penalty of perjury that the foregoing statement is true and correct:

1. On August 21, 2017, I served the following document(s):

STANDARD DISCOVERY PLAN

2. I served the above-named document(s) by the following means to the persons as listed below:

(Check all that apply)

a. ECF System (You must attach the "Notice of Electronic Filing", or list all persons and address and attach additional paper if necessary)

3. On August 21, 2017, I served the above-named document(s) by the following means to the persons as listed below:

■ b. United States mail, postage fully pre-paid (List persons and addresses. Attach additional paper if necessary)

JED MARGOLIN
c/o Brownstein Hyatt Farber Schreck, LLP
Attn: Adam P. McMillen, Esq.
5371 Kietzke Lane
Reno, NV 89511

JAZI GHOLAMREZA ZANDIAN
6 RUE EDOUARD FOURNIER
PARIS

STEVE E. ABELMAN on behalf of Creditor
JED MARGOLIN
BROWNSTEIN HYATT FARBER SCHRECK
410 17th STREET, STE 2200
DENVER, CO 80241

Jeffrey L. Hartman, Esq.
HARTMAN & HARTMAN
510 West Plumb Lane, Suite B
Reno, NV 89509
Attorney for Patrick Canet

4. That such mailing was accomplished by first class mail, pre-paid, in a sealed envelope.

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

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

Signed on this 21st day of August, 2017.

/s/ Kelli Wightman
An employee of Wright, Finlay & Zak, LLP