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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**

12 In re: JAZI GHOLAMREZA ZANDIAN,
13
14 Debtor.

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

Chapter 15

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

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

**JOINT MOTION / STIPULATION TO
EXTEND TIME TO FILE DISPOSITIVE
MOTIONS**

[FIRST REQUEST]

20 Plaintiffs,

21 vs.

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

25 Defendant.

26 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.

COMES NOW, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and Ray Koroghli and Sathsowi T. Koroghli, in their individual capacities as well as Managing Trustees for Koroghli Management Trust (hereinafter “PLAINTIFF”) and Defendant, Jed Margolin (“MARGOLIN”) (collectively, the “Parties”), by and through their respective counsels of record, hereby jointly submit this request for an extension of time for filing Dispositive Motions up to and including Monday, May 14, 2018.

The undersigned parties are actively engaged in settlement discussions to resolve Plaintiff’s claims against Margolin, and any related defenses, in this action. In light of the significant progress made in settlement of this case to date, parties reasonably believe that

1 additional time will result in successful settlement of this case in lieu of further motion practice
2 and trial.

3 The parties seek additional time to finalize settlement documents and dismissal papers
4 without waiving the right to filing dispositive motions during the time the agreed upon material
5 settlement terms are reduced to writing.

6 The parties thus agree that each shall have until May 14, 2018 to file any dispositive
7 motions on claims and defenses asserted against each other. This Stipulation shall not affect or
8 alter the existing date (March 28, 2018) to file dispositive motions on claims and defenses
9 asserted by or against Defendant/Counterclaimant/Cross-Claimant, Patrick Canet.

10 This is the parties' first request for extension and is not submitted for the purpose of
11 causing undue delay or prejudice.

12 DATED this 26th day of March, 2018.

DATED this 26th day of March, 2018.

13 **WRIGHT, FINLAY & ZAK, LLP**

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

14 /s/ Yanxiong Li, Esq.

/s/ Matthew D. Francis, Esq.

15 Edgar C. Smith, Esq.

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

Attorneys for *Jed Margolin*

22 *capacity and as Trustee for The Star Living*

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

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

25 *Koroghli, in their individual capacities as well*

26 *as Managing Trustees for Koroghli*

27 *Management Trust*

CERTIFICATE OF SERVICE

I, Nicole Lane, 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 March 27, 2018, I served the following document(s):
JOINT MOTION / STIPULATION TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS [FIRST REQUEST]

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 March 26, 2018, 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: Matthew D. Francis, 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 27th day of March, 2018.

/s/ Nicole Lane
An employee of Wright, Finlay & Zak, LLP