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12 *Attorneys for Plaintiffs, Fred Sadri, individually and as Trustee for The Star Living Trust, dated*
 13 *April 14, 1997; Ray Koroghli, individually; Ray Koroghli and Sathsowi T. Koroghli, as*
 14 *Managing Trustees for Koroghli Management Trust*

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

17 In re: JAZI GHOLAMREZA ZANDIAN,

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

18 Debtor

Chapter 15

19 PATRICK CANET,

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

20 Foreign Representative

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

**PARTIAL JOINDER TO PATRICK
 CANET'S OPPOSITION AND
 COUNTERMOTION FOR SUMMARY
 JUDGMENT VOIDING JUDGMENT
 LIEN**

26 Plaintiffs,

27 vs.

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

Defendants

1 PATRICK CANET,

2
3 Counterclaimant,

4 vs.

5 FRED SADRI, INDIVIDUALLY AND AS
6 TRUSTEE FOR THE STAR LIVING TRUST,
7 DATED APRIL 14, 1997; RAY KOROGHLI,
8 INDIVIDUALLY; RAY KOROGHLI AND
9 SATHSOWI T. KOROGHLI, AS MANAGING
TRUSTEES FOR KOROGHLI
MANAGEMENT TRUST,

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11 Counter-defendants

12 PATRICK CANET,

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14 Crossclaimant,

15 vs.

16 JED MARGOLIN,

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18 Cross-defendant
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20 Plaintiffs FRED SADRI, AS TRUSTEE FOR THE STAR LIVING TRUST, DATED
21 APRIL 14, 1997 (“SL Trust”) and RAY KOROGHLI and SATHSOWI T. KOROGHLI, AS
22 MANAGING TRUSTEES FOR KOROGHLI MANAGEMENT TRUST (“KM Trust” and
23 together with SL Trust, as “Plaintiffs”), by and through their attorneys of record, the law firm of
24 Wright, Finlay & Zak, LLP, join in arguments asserted by Patrick Canet in his Opposition and
25 Counter-motion for Summary Judgment [Adv. No. 34] to void judgment lien and related
26 execution sales conducted by Jed Margolin. Specifically, Plaintiffs join in Mr. Canet’s argument
27 that Mr. Margolin’s purported judgment lien was void *ab initio* because it lacks necessary
28 information required under NRS 17.150(4) “for the purpose of creating a lien.” [Adv. No. 34 at

1 6:11-23] (In addition to recording the information described in subsection 2, a judgment creditor
2 who records a judgment or decree *for the purpose of creating a lien upon the real property* of
3 the judgment debtor...*shall record* at that time an affidavit of judgment...); *See, e.g., Clark Cty.*
4 *v. S. Nev. Health Dist.*, 128 Nev. 651, 656, 289 P.3d 212, 215 (2012) (“If the Legislature’s
5 intention is apparent from the face of the statute, there is no room for construction, and this court
6 will give the statute its plain meaning”); *see also Alcove Inv., Inc. v. Conceicao* (In re
7 *Conceicao*), 331 B.R. 885, 894 (B.A.P. 9th Cir. 2005) (“in construing California’s counterpart to
8 NRS 17.150(4), the 9th Circuit B.A.P. held that judgment lien was invalid where judgment
9 creditor failed to include debtor’s social security number or indicate that it is unknown when
10 recording the judgment.”). Here, Mr. Margolin did not record any affidavit. Nor does the
11 Default Judgment itself set forth (1) address of the judgment debtor; (2) last four digits of
12 judgement debtor’s driver’s license number or identification card number and state of issuance or
13 of the judgment debtor’s social security number; (3) assessor parcel number and address of the
14 real property; and (4) a statement that judgment creditor has confirmed that the judgment debtor
15 is the legal owner of that real property. *See* [Adv. No. 26-1] (Exhibit A to Declaration of Adam
16 McMillen – copies of Default Judgment). The judgment lien is void based on the patent
17 deficiencies in contravention of NRS 17.150(4).

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1 Because Mr. Margolin did not hold a valid judgment lien, the judgment execution sales of
2 parcels 079-150-10, 084-040-02, 084-130-07 was ineffective in transferring the two-thirds
3 interest held by Plaintiffs to Mr. Margolin. Accordingly, judgment should be entered declaring
4 that Plaintiffs own two-thirds interest in the subject properties free and clear of any judgment
5 lien claimed by Mr. Margolin.

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7 DATED this 12th day of April, 2018.

8 WRIGHT, FINLAY & ZAK, LLP

9
10 /s/ Yanxiong Li, Esq.

Dana Jonathon Nitz, Esq.

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Attorneys for Plaintiffs,

*Fred Sadri, as Trustee for The Star Living Trust,
dated April 14, 1997; Ray Koroghli and Sathsowi T.
Koroghli, as Managing Trustees for Koroghli
Management Trust*

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 April 12, 2018, I served the following document(s):

**PARTIAL JOINDER TO PATRICK CANET’S OPPOSITION AND
COUNTERMOTION FOR SUMMARY JUDGMENT VOIDING JUDGMENT LIEN**

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)

MATTHEW D. FRANCIS on behalf of Cross Defendant JED MARGOLIN
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YANXIONG LI on behalf of Counter-Defendant SATHSOWI T. KOROGHLI
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3. On April 12, 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.
Attn: Arthur Zorio, 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
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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 12th day of April, 2018.

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