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5 Attorneys for JED MARGOLIN  
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8 **IN THE UNITED STATES BANKRUPTCY COURT**  
9 **FOR THE DISTRICT OF NEVADA**

10  
11 In Re JAZI GHOLAMREZA ZANDIAN,  
12 Debtor.

Case No. BK-N-16-50644-BTB

Adversary No. 17-05016-BTB

13 FRED SADRI, AS TRUSTEE FOR THE  
14 STAR LIVING TRUST, DATED APRIL  
15 14, 1997; RAY KOROGHLI AND  
SATHSOWI T. KOROGHLI, AS  
16 MANAGING TRUSTEES FOR  
KOROGHLI MANAGEMENT TRUST,

**INITIAL DISCLOSURES OF DEFENDANT  
JED MARGOLIN**

17 Plaintiffs,

18 v.

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

21 Defendants.

22  
23 Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, made applicable to this  
24 Adversary Proceeding by Rule 7026 of the Federal Rules of Bankruptcy Procedure, Defendant  
25 and Cross-Defendant JED MARGOLIN (“MARGOLIN”), through undersigned counsel, makes  
26 the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1)(A) based on information now  
27 known. MARGOLIN reserves the right to revise and supplement these disclosures based upon  
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1 the receipt of additional relevant information. By making these disclosures, MARGOLIN does  
2 not waive any privileges or protections that may apply, nor does he concede the relevance of the  
3 information disclosed. These disclosures are subject to the following qualifications:

4 1. Fact investigation and discovery are ongoing. These disclosures are based upon  
5 information currently known to undersigned counsel for MARGOLIN and are provided with the  
6 understanding that MARGOLIN may produce or rely upon, during discovery or at any other stage  
7 of the proceedings, information or documents that are subsequently discovered, subsequently  
8 determined to be relevant, or subsequently determined to have been omitted from these  
9 disclosures.  
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11 2. MARGOLIN expressly reserves the right to revise or supplement these  
12 disclosures, as well as any documents or information provided pursuant to these disclosures, at  
13 any time. MARGOLIN further reserves the right to rely on any facts, documents, information, or  
14 other evidence that may hereafter develop, come to his attention, or prove to be relevant for any  
15 purpose or reason. MARGOLIN, however, undertakes no obligation to revise or supplement  
16 these disclosures beyond the requirements imposed by Fed. R. Civ. P. 26(e)(1).  
17

18 3. MARGOLIN undertakes no obligation to produce or identify materials that are  
19 already in the possession of other parties or otherwise available from public sources, including,  
20 but not limited to, previous filings and productions in this action, as such materials are equally  
21 available to all parties.  
22

23 4. MARGOLIN reserves any and all objections to the use, for any purpose, of these  
24 disclosures or any of the information or documents referenced in them, in this case or in any other  
25 case or proceeding. In particular, MARGOLIN does not make any representation or concession  
26 as to the admissibility of any of the documents or information referenced in these disclosures, and  
27 reserves the right to object on appropriate grounds to any discovery request seeking documents or  
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1 information referenced in these disclosures. MARGOLIN makes no representations and waives  
2 no objections regarding the knowledge or competence of any particular individual, and reserves  
3 the right to object on any appropriate ground to the deposition or testimony of any individual.

4 **I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

5 The following list sets forth the name, address, and telephone number of individuals who  
6 may have discoverable information that MARGOLIN may use to support his defenses, along with  
7 the subjects of that information.  
8

9 Subject to and without waiving the above qualifications, MARGOLIN states that the  
10 following individuals may have discoverable information regarding the subjects indicated below:

- 11 1. Jed Margolin  
12 c/o Brownstein Hyatt Farber Schreck, LLP  
13 5371 Kietzke Lane  
14 Reno, NV 89511  
(775) 324-4100

15 Mr. Margolin is a Defendant and Cross-Defendant in this matter and may testify regarding  
16 his knowledge of the facts and circumstances which brought rise to this action and all pertinent  
17 matters thereof.

- 18 2. Fred Sadri  
19 Individually and as Trustee for The Star Living Trust  
20 c/o Wright, Finlay & Zak, LLP  
21 7785 W. Sahara Avenue, Suite 200  
Las Vegas, NV 89117  
(702) 475-7964

22 Mr. Sadri is a Plaintiff in this matter and may testify regarding his knowledge of the facts  
23 and circumstances which brought rise to this action and all pertinent matters thereof.

- 24 3. Ray Koroghli  
25 Individually and as Managing Trustee for Koroghli Management Trust  
26 c/o Wright, Finlay & Zak, LLP  
27 7785 W. Sahara Avenue, Suite 200  
28 Las Vegas, NV 89117  
(702) 475-7964

1 Mr. Koroghli is a Plaintiff in this matter and may testify regarding his knowledge of the  
2 facts and circumstances which brought rise to this action and all pertinent matters thereof.

3 4. Sathsowi T. Koroghli  
4 Individually and as Managing Trustee for Koroghli Management Trust  
5 c/o Wright, Finlay & Zak, LLP  
6 7785 W. Sahara Avenue, Suite 200  
7 Las Vegas, NV 89117  
8 (702) 475-7964

9 Mr. Koroghli is a Plaintiff in this matter and may testify regarding his knowledge of the  
10 facts and circumstances which brought rise to this action and all pertinent matters thereof.

11 5. Jazi Gholamreza Zandian, aka Reza Zandian aka Golamreza Zandianjazi aka  
12 Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka  
13 Ghononreza Zandian Jazi, an individual  
14 6 Rue Edouard Fournier  
15 Paris 75116

16 Mr. Zandian is the debtor in connection with the underlying bankruptcy proceeding  
17 pending in Case No. 16-50644-btb. Mr. Zandian may testify regarding his knowledge of the  
18 facts and circumstances which brought rise to this action and all pertinent matters thereof.

19 6. Niloofar Foughani  
20 6 Rue Edouard Fournier  
21 Paris 75116

22 Ms. Foughani is the spouse of the debtor Jazi Gholamreza Zandian, aka Reza Zandian aka  
23 Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza  
24 Jazi aka Ghononreza Zandian Jazi. Niloofar Foughani may testify regarding her knowledge of  
25 the facts and circumstances which brought rise to this action and all pertinent matters thereof.

26 7. Alborz Zandian  
27 9 MacArthur Place, Unit 2105  
28 Santa Ana, California 92707-6753

Alborz Zandian is the son of debtor Jazi Gholamreza Zandian, aka Reza Zandian aka  
Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza

1 Jazi aka Ghononreza Zandian Jazi. Alborz Zandian may testify regarding his knowledge of the  
2 facts and circumstances which brought rise to this action and all pertinent matters thereof.

3 8. All individuals disclosed by Plaintiffs and other parties.

4 9. All individuals necessary for impeachment or rebuttal.

5 10. All individuals necessary to authenticate or otherwise lay the foundation for a  
6 document.  
7

8 MARGOLIN reserves the right to supplement and revise this list of individuals as new  
9 information is discovered, in accordance with Fed. R. Civ. P. 26(e).

10 **II. DESCRIPTION OF DOCUMENTS, ELECTRONICALLY STORED**  
11 **INFORMATION, AND TANGIBLE THINGS**

12 The following list sets forth the categories of documents, electronically stored  
13 information, and tangible things which MARGOLIN has in his possession, custody, or control,  
14 and may use to support his defenses, which will be produced subject to the entry of a protective  
15 order, and/or are equally available to other parties.

16 1. Documents obtained by and in the possession of MARGOLIN in connection with  
17 the subject matter of this litigation, identified as follows:  
18

Bates #	Name
JM_0001-4	la-times_1993_0110.pdf
JM_0004-14	ca-docket-report.pdf
JM_0015-17	FedReg_95-18696.pdf
JM_0018-21	BankMelli.pdf
JM_0022-26	MoTV-Zandian-Bribe.pdf
JM_0027-31	MoTV-McMillen_decl.pdf
JM_0032-42	Clark_A-15-743057-C.pdf
JM_0043	Clark_A-15-743057-C_CaseDetail.pdf
JM_0044-45	lyonpark_nvsos_2016_1007.pdf
JM_0046-47	hitech_nvsos_2016_1007.pdf
JM_0048-49	churchillpark_nvsos_2016_1007.pdf
JM_0050-51	renohighway_nvsos_2016_1007.pdf
JM_0052-54	otcnv_nvsos_2016_1007.pdf
JM_0055	sparksvillage_nvsos_withdraw.pdf
JM_0056	sparksvillage_064-140-11.pdf
JM_0057-59	sparksvillage_nvsos_2017_0824.pdf

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Bates #	Name
JM_0060	i50_nvsos_withdraw.pdf
JM_0061-63	i50_lyon-apns.pdf
JM_0064-66	i50_nvsos_2017_0824.pdf
JM_0067-68	dayton_nvsos_2014_0319.pdf
JM_0069-70	dayton_nvsos_2017_0824.pdf
JM_0071-72	dayton_lyon_apns.pdf
JM_0073-75	11000reno_nvsos_2014_0309.pdf
JM_0076-78	11000reno_nvsos_2017_0824.pdf
JM_0079	11000reno_churchill_007-091-12.pdf
JM_0080-81	stagecoach_nvsos_2014_0309.pdf
JM_0082-83	stagecoach_nvsos_2017_0824.pdf
JM_0084	stagecoach_lyon_015-402-09.pdf
JM_0085-86	elko_nvsos_2014_0309.pdf
JM_0087-88	elko_nvsos_2017_0824.pdf
JM_0089-90	elko_006-100-008.pdf
JM_0091-96	zandian_uasc_deal.pdf
JM_0097-98	uasc_doc131.pdf
JM_0099-109	sadri_bad-faith.pdf
JM_0110-111	pilb3.pdf
JM_0112-115	sadri_2017_0909.pdf
JM_0116	zandian_deposit.pdf
JM_0117-419	Motion to Void Deeds.pdf
JM_0420-423	Notice of Bankruptcy and Automatic Stay.pdf
JM_0424-426	Sheriff's Certificate of Sale.Washoe Co APN 079-150-12.pdf
JM_0428-430	Sheriff's Deed Washoe Co APN 079-150-12.pdf
JM_0431-436	Sheriff's Deed Clark Co APN 071-02-000-005.pdf
JM_0437-	Sheriff's Deed Clark Co APN 071-02-000-013.pdf
JM_0443-495	Exhibits Re Zandian Fraud.pdf
JM_0496-521	Default Judgment recorded.pdf
JM_0522-548	UNCITRAL Arbitration Rules.pdf
JM_0549-554	FCC_L632-1en.pdf
JM_0555-557	FCC_L632-1fr.pdf
JM_0558-565	Canet_nv-counties.pdf
JM_0566-611	JCPOA.faqs.pdf
JM_0612-614	Office of Foreign Assets Control.pdf
JM_0615-616	French Court Doc 2002L00750.pdf
JM_0617-624	JUDGMENT of July 20 2005 with translation.pdf
JM_0625-637	JUDGMENT of November 28 2011 with translation.pdf
JM_0638-641	Order of Affirmance.NSC Case Nos. 65205 and 65960.pdf
JM_0642-645	Order Re Writ of Execution.FJDC Case No. 09OC00579 1B.pdf
JM_0646-651	Writ of Execution.FJDC Case No. 09OC00579 1B.pdf
JM_0652-658	Writ of Execution.FJDC Case No. 09OC00579 1B.pdf
JM_0659-661	Sheriff's Certificate of Sale of Real Property.Clark Co APN 071-02-000-005.pdf

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Bates #	Name
JM_0662-664	Sheriff's Certificate of Sale of Real Property.Cark Co APN 071-02-000-013.pdf
JM_0665-667	Sheriff's Certificate of Sale of Real Property.Washoe Co APN 079-150-12.pdf
JM_0668-670	Sheriff's Certificate of Sale of Real Property.Washoe Co APN 079-150-1JM_00.pdf
JM_0671-673	Sheriff's Certificate of Sale of Real Property.Washoe Co APN 084-040-02.pdf
JM_0674-676	Sheriff's Certificate of Sale.Washoe Co APN 084-130-07.pdf
JM_0677-687	Motion to Withdraw as Counsel.FJDC Case No. 09OC09679 1B.pdf
JM_0688-690	Warrant of Arrest.FJDC Case No. 09OC00279 1B.pdf
JM_0691-711	Grant Bargain and Sale Deed.Elko Co Doc No. 629773.pdf
JM_0712-713	Real Property Assessment Data Sparks Village LLC.Washoe Co APN 084-140-11.pdf
JM_0714-715	Zandian Certificate of Resignation as Manager.Sparks Village LLC.pdf
JM_0716-719	Entity Details NV SOS.Sparks Village LLC.pdf

2. Documents filed in the First Judicial District Court, Case No. 090C995791B, identified as follows:

Bates #	Name
JM_FJD_0001-3	2009-1211 Civil Cover Sheet.pdf
JM_FJD_0004-14	2009-1211 Complaint.pdf
JM_FJD_0015-16	2009-1214 Summons.pdf
JM_FJD_0017-22	2009-1215 Summons.Additional with proof of service.pdf
JM_FJD_0023-26	2010-0326 Summons Additional.Optima CA.pdf
JM_FJD_0027	2010-1202 Application for Entry of Default.Optima CA.pdf
JM_FJD_0028	2010-1202 Application for Entry of Default.Optima NV.pdf
JM_FJD_0029	2010-1202 Application for Entry of Default.Zandian.pdf
JM_FJD_0030-31	2010-1202 Default.Optima CA.pdf
JM_FJD_0032	2010-1202 Default.Optima NV.pdf
JM_FJD_0033	2010-1202 Default.Zandian.pdf
JM_FJD_0034-38	2010-1207 Notice of Entry of Default.Optima CA.pdf
JM_FJD_0039-43	2010-1207 Notice of Entry of Default.Optima NV.pdf
JM_FJD_0044-48	2010-1207 Notice of Entry of Default.Zandian.pdf
JM_FJD_0049-51	2011-0225 Certificate of Service.pdf
JM_FJD_0052-62	2011-0228 Application Default Judgment.pdf
JM_FJD_0063-103	2011-0228 Declaration of Cassandra P. Joseph in Support of Application for Default Judgment.pdf
JM_FJD_0104-147	2011-0228 Declaration of Jed Margolin in Support of Application for Default Judgment.pdf
JM_FJD_0148-149	2011-0301 Default Judgment.pdf
JM_FJD_0150-155	2011-0307 Notice Entry Default Judgment.pdf
JM_FJD_0156-191	2011-0609 Motion to Dismiss.pdf
JM_FJD_0192-193	2011-0613 Notice Change of Counsel.pdf

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Bates #	Name
JM_FJD_0194-195	2011-0613 Notice of Appearance.pdf
JM_FJD_0196-311	2011-0622 Margolin Opp to Motion to Dismiss.pdf
JM_FJD_0312-315	2011-0705 Reply to Opposition to Motion to Dismiss on a Special Appearance.pdf
JM_FJD_0316-319	2011-0705 Reply to Opposition to Motion to Dismiss on a Special Appearance.pdf
JM_FJD_0320-323	2011-0705 Reply to Opposition.pdf
JM_FJD_0324-326	2011-0713 Req For Submission.pdf
JM_FJD_0327-330	2011-0803 Order Setting Aside Default....pdf
JM_FJD_0331-338	2011-0811 Amended Complaint.pdf
JM_FJD_0339-391	2011-0811 Motion to Serve by Publication.pdf
JM_FJD_0392-394	2011-0907 Request for Submission.pdf
JM_FJD_0395-396	2011-0909 Order re Service by Publication.pdf
JM_FJD_0397-402	2011-0913 Notice of Entry of Order.Order Allowing Service by Publication.pdf
JM_FJD_0403-405	2011-0923 Request for Submission.Amended Order Allowing Service by Publication.pdf
JM_FJD_0406-407	2011-0927 Amended order.pdf
JM_FJD_0408-413	2011-1005 Notice of Entry of Amended Order Allowing Service by Publication.pdf
JM_FJD_0414-418	2011-1107 Aff Serv by Pub CA Corp.pdf
JM_FJD_0419-423	2011-1107 Aff Serv by Pub NV Corp.pdf
JM_FJD_0424-428	2011-1107 Aff Serv by Pub Zandian.pdf
JM_FJD_0429-430	2011-1107 Cert of Service.pdf
JM_FJD_0431-432	2011-1108 Amended Cert of Service-1.pdf
JM_FJD_0433-532	2011-1117 Motion to Dismiss Amended Complaint on Special Appearance.pdf
JM_FJD_0533-632	2011-1117 Motion to Dismiss Amended Complaint.pdf
JM_FJD_0633-822	2011-1205 Opposition to Motion to Dismiss.pdf
JM_FJD_0823-830	2011-1213 Reply to Opposition to Motion to Dismiss.pdf
JM_FJD_0831-870	2012-0123 Margolin Declaration iso Mtn to Strike.pdf
JM_FJD_0871-877	2012-0123 Motion to Strike.pdf
JM_FJD_0878-880	2012-0202 Opp Motion to Strike.pdf
JM_FJD_0881-893	2012-0213 McMillen Decl.pdf
JM_FJD_0894-897	2012-0213 Reply re Motion to Strike.pdf
JM_FJD_0898-900	2012-0213 Req For Submission.pdf
JM_FJD_0901-909	2012-0221 Order Denying Def's Motion to Dismiss.pdf
JM_FJD_0910-911	2012-0223 Order Denying Motion to Strike.pdf
JM_FJD_0912-924	2012-0224 Notice of Entry.pdf
JM_FJD_0925-927	2012-0305 General Denial.pdf
JM_FJD_0928-932	2012-0307 John Peter Lee's Mtn to Withdraw From Representation of Def.pdf
JM_FJD_0933-937	2012-0307 Motion to Withdraw Lee.pdf
JM_FJD_0938-940	2012-0309 Notice of Intent to take Default.pdf
JM_FJD_0941-946	2012-0309 Req Exemption from Arbitration.pdf
JM_FJD_0947-952	2012-0314 Amended Mot to Withdraw.pdf
JM_FJD_0953-955	2012-0314 General Denial - Corps.pdf
JM_FJD_0956-961	2012-0314 John Peter Lee's Amended Motion to Withdraw.pdf
JM_FJD_0962-971	2012-0316 APM Decl in Support Non-Opp.pdf
JM_FJD_0972-974	2012-0316 Notice Non-Opp Mot to Withdraw.pdf

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Bates #	Name
JM_FJD_0975-985	2012-0330 Declaration of APM in Support of Notice of Non-Opposition to John Peter Lee's.pdf
JM_FJD_0986-988	2012-0330 Notice of Non-Opposition to John Peter Lee's Amended Motion to Withdraw From Representation.pdf
JM_FJD_0989-1039	2012-0420 Supplemental Req for Exemption.pdf
JM_FJD_1040-1042	2012-0423 Req For Submission.pdf
JM_FJD_1043-1044	2012-0426 Order Granting John Peter Lee's Amended Motion to Withdraw.pdf
JM_FJD_1045-1046	2012-0509 Notice of Entry of Order.Granted John Peter Lee Motion to Withdraw.pdf
JM_FJD_1047-1050	2012-0509 Notice of Entry of Order.pdf
JM_FJD_1051-1054	2012-0510 Margolin Decl.pdf
JM_FJD_1055-1060	2012-0510 Second Supp.pdf
JM_FJD_1061-1065	2012-0515 Motion to Compel App of Counsel.pdf
JM_FJD_1066-1068	2012-0529 Decision of Arbitration Commissioner.Removal from Arbitration.pdf
JM_FJD_1069-1071	2012-0529 Removal from mandatory arbitration.pdf
JM_FJD_1072-1074	2012-0606 Request for Submission.Motion to Compel.pdf
JM_FJD_1075-1085	2012-0614 Unilateral Case Conference Rpt.pdf
JM_FJD_1086-1089	2012-0628 Order Granting Mot to Compel or Strike.pdf
JM_FJD_1090-1097	2012-0702 Notice of Entry of Order.pdf
JM_FJD_1098-1106	2012-0912 Return Notice.Default.pdf
JM_FJD_1107-1114	2012-0914 Application For Entry of Default.pdf
JM_FJD_1115-1121	2012-0924 Default - Optima.pdf
JM_FJD_1122-1132	2012-0927 Notice Entry of Default.pdf
JM_FJD_1133	2012-1030 Affidavit of Service.SDT Dec Cust Records NASA.pdf
JM_FJD_1134-1139	2012-1030 Application for Default Judgment.pdf
JM_FJD_1140-1173	2012-1030 Dec of Adam McMillen iso Application for Default Judgment
JM_FJD_1174-1219	2012-1030 Dec of Jed Margolin iso Application for Default Judgment.pdf
JM_FJD_1220-1222	2012-1031 Default judgment.pdf
JM_FJD_1223-1229	2012-1106 Notice of Entry of Judgment.pdf
JM_FJD_1230	2012-1114 Affidavit of Service.SDT Cust of Records John Peter Lee, Ltd .pdf
JM_FJD_1231-1261	2012-1214 Dec of APM in Support of Motion for Sanctions.pdf
JM_FJD_1262-1268	2012-1214 Motion for Sanctions.pdf
JM_FJD_1269-1275	2013-0102 Defendant Zandian's Motion for Stay of Proceedings to Enforce Judgment.pdf
JM_FJD_1276-1278	2013-0111 Request for Submission.pdf
JM_FJD_1279-1280	JM_FJD_1279-1280 2013-0115 Order Granting Plaintiff's Motion for Sanctions.pdf
JM_FJD_1281-1286	2013-0117 Notice of Entry of Order (Order Granting Plaintiff's Motion for Sanctions).pdf
JM_FJD_1287-1294	2013-0220 Dec of APM in Support of App for Attorney Fees and Costs.pdf
JM_FJD_1295-1300	2013-0220 PI App for Attorney Fees and Costs.pdf
JM_FJD_1301-1302	2013-0304 Declaration of Mailing.pdf
JM_FJD_1303-1304	2013-0328 Default.pdf
JM_FJD_1305-1307	2013-0328 Request for Submission.pdf

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Bates #	Name
JM_FJD_1308-1309	2013-0329 Order Granting Plaintiff's Application for Attorney's Fees and Costs.pdf
JM_FJD_1310-1314	2013-0403 Notice of Entry of Default.pdf
JM_FJD_1315-1320	2013-0403 Notice of Entry of Order Granting Plaintiff's Application for Fees and Costs.pdf
JM_FJD_1321-1325	2013-0405 Amended Notice of Entry of Default.pdf
JM_FJD_1326-1338	2013-0417 Application for Default Judgment.pdf
JM_FJD_1339-1342	2013-0417 Dec of APM in Support of App for Default Judgment.pdf
JM_FJD_1343-1388	2013-0417 Dec of Jed Margolin in Support of App for Default Judgment.pdf
JM_FJD_1389-1391	2013-0621 Request for Submision.Default Judgment.pdf
JM_FJD_1392-1394	2013-0624 Default Judgment.pdf
JM_FJD_1395-1397	2013-0624 Default Judgment-2.pdf
JM_FJD_1398-1403	2013-0627 Notice of Entry of Default Judgment.pdf
JM_FJD_1404-1409	2013-0627 Notice of Entry of Default Judgment.pdf
JM_FJD_1410-1459	2013-1211 Motion for Judgment Debtor Examination and to Produce Documents.pdf
JM_FJD_1460-1476	2013-1220 Defendant Zandian's Motion to Set Aside Default Judgment.pdf
JM_FJD_1477-1493	2013-1220 Motion to Set Aside Default Judgment.pdf
JM_FJD_1494-1496	2013-1220 Notice of Appearance.Hawkins Melendrez.pdf
JM_FJD_1497-1503	2014-0102 Defendant Zandian's Motion for Stay of Proceedings to Enforce Judgment.pdf
JM_FJD_1504-1577	2014-0109 Opposition to Motion to Set Aside Judgment.pdf
JM_FJD_1578-1580	2014-0109 Request for Submission.Motion for Debtor Exam.pdf
JM_FJD_1581-1584	2014-0113 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents.pdf
JM_FJD_1585-1592	2014-0117 Notice of Entry.Order Granting Pl's Motion for Debtor Exam and to Produce Docs.pdf
JM_FJD_1593-1596	2014-0117 Opposition to Motion for Stay of Proceedings to Enforce Judgment.pdf
JM_FJD_1597-1610	2014-0123 Defendant Zandian's Reply iso Motion to Set Aside Default Judgment.pdf
JM_FJD_1611-1613	2014-0123 Request for Submission and Hearing on Defendant Reza Zandian's Motion to Set Aside.pdf
JM_FJD_1614-1620	2014-0203 Def Zandian's Reply iso Motion for Stay of Proceedings to Enforce Judgment.pdf
JM_FJD_1621-1630	JM_FJD_1621-1630 2014-0206 Order Denying Def's Motion to Set Aside Default Judgment.pdf
JM_FJD_1631-1644	2014-0210 Notice of Entry of Order Denying Zandian's Motion to Set Aside Judgment.pdf
JM_FJD_1645-1667	2014-0212 Motion for Order to Show Cause Regarding Contempt.pdf
JM_FJD_1668-1670	2014-0221 Substitution of Counsel.Kaempher Crowell.pdf
JM_FJD_1671-1696	2014-0303 Opposition to Motion for OSC Re Contempt.pdf
JM_FJD_1697-1704	2014-0312 Case Appeal Statement.pdf
JM_FJD_1705-1723	2014-0312 Notice of Appeal.pdf
JM_FJD_1724-1726	2014-0312 Notice of Cash Deposit in Lieu of Bond.pdf
JM_FJD_1727-1738	2014-0313 Reply iso Motion for OSC Re Contempt.pdf
JM_FJD_1739-1741	2014-0313 Request for Submission.Motion for OSC.pdf
JM_FJD_1742-1744	2014-0317 Order Denying Request for Submission.pdf

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Bates #	Name
JM_FJD_1745-1748	2014-0402 First Memorandum of Post-Judgment Costs and Fees.pdf
JM_FJD_1749-1805	2014-0402 Motion for Writ of Execution.pdf
JM_FJD_1806-1815	2014-0409 Motion to Retax and Settle Costs.pdf
JM_FJD_1816-1817	2014-0417 Stipulation and Order to Withdraw Motion Filed by Reza Zandian on 3.24.14.pdf
JM_FJD_1818-1823	2014-0421 Opposition to Motion for Writ of Execution.pdf
JM_FJD_1824-1826	2014-0421 Reply iso Motion for Writ of Execution and Opp to Motion to Retax and Settle Costs.pdf
JM_FJD_1827-1906	2014-0428 Dec of APM iso Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1907-1914	2014-0428 Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1915-1925	2014-0430 Def Motion to Retax and Settle Costs.pdf
JM_FJD_1926-1946	2014-0512 Dec of APM iso Reply iso Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1947-1955	2014-0512 Opp to Motion for Order Allowing Costs and Disbursements.pdf
JM_FJD_1956-1964	2014-0512 Opposition to Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1965-1971	2014-0512 Reply iso Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1972-1974	2014-0512 Request for Submission.Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1975-1977	2014-0514 Amended Request for Submission.pdf
JM_FJD_1978-1987	2014-0519 Order On Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_1988-2001	2014-0521 Notice of Entry of Order.pdf
JM_FJD_2002-2005	2014-0609 Notice Zandian Unable to Pay.pdf
JM_FJD_2006-2051	2014-0618 Motion for Writ of Execution.pdf
JM_FJD_2022-2058	2014-0623 Case Appeal Statement.pdf
JM_FJD_2059-2076	2014-0623 Notice of Appeal.Order on Motion for Order Allowing Costs and Necessary Disbursements.pdf
JM_FJD_2077-2079	2014-0623 Notice of Cash Deposit in Lieu of Bond.pdf
JM_FJD_2080	2014-0701 First JD Receipt from Kaempfer Crowel \$500.pdf
JM_FJD_2081-2088	2014-0707 Opposition to Motion for Writ of Execution.pdf
JM_FJD_2089-2132	2014-0717 Reply iso Motion for Writ of Execution.pdf
JM_FJD_2133-2140	2014-0718 Motion to Strike Reply iso Motion for Writ of Execution.pdf
JM_FJD_2141-2150	2014-0723 Docket Entries.pdf
JM_FJD_2151-2153	2014-0723 Request for Submission.Motion for Writ of Execution.pdf
JM_FJD_2154-2156	2014-0725 Order Granting Defendant Zandian's Request to File Sur-Reply.pdf
JM_FJD_2157-2162	2014-0731 Notice of Entry.Order Granting Surreply.pdf
JM_FJD_2163-2167	2014-0804 Opposition to Motion to Strike.pdf
JM_FJD_2168-2178	2014-0806 Sur-Reply to Reply iso Motion for Writ of Execution.pdf
JM_FJD_2179-2181	2014-0808 Request for Submission.pdf
JM_FJD_2182-2184	2014-0818 Order Re Writ of Execution.pdf
JM_FJD_2185-2189	2014-0905 Writ of Execution.Clark County.pdf
JM_FJD_2190-2195	2014-0910 Writ of Execution.Washoe County.pdf

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Bates #	Name
JM_FJD_2196-2198	2014-1021 Notice of Sheriff's Sale of Real Property APN ending 005.pdf
JM_FJD_2199-2201	2014-1021 Notice of Sheriff's Sale of Real Property APN ending 013.pdf
JM_FJD_2202-2207	2014-1104 Affidavit of Posting Notice of Sheriff's Sale.05.pdf
JM_FJD_2208-2213	2014-1104 Affidavit of Posting Notice of Sheriff's Sale.013.pdf
JM_FJD_2214-2223	2014-1105 Missing Documents from Court's Docket.pdf
JM_FJD_2224-2228	2014-1106 Affidavit of Publication.Clark Co APN 071-02-000-005.pdf
JM_FJD_2229-2232	2014-1106 Affidavit of Publication.Clark Co APN 071-02-000-013.pdf
JM_FJD_2233-2235	2014-1106 Cert of Service.Affidavits of Posting Notice of Sheriff's Sale.pdf
JM_FJD_2236-2237	2015-0105 Sheriff's Certificate of Sale.Clark County.005.pdf
JM_FJD_2238-2239	2015-0105 Sheriff's Certificate of Sale.Clark County.013.pdf
JM_FJD_2240-2241	2015-0108 Declaration of Service.pdf
JM_FJD_2242-2243	2015-0108 Sheriff's Cert of Sale of Real Property #005.pdf
JM_FJD_2244-2245	2015-0108 Sheriff's Cert of Sale of Real Property #013.pdf
JM_FJD_2246-2249	2015-0108 Writ of Execution.pdf
JM_FJD_2250-2258	2015-0610 Motion for Judgment Debtor Examination and to Produce Documents.pdf
JM_FJD_2259-2314	2015-0629 Def Zandian's Opposition to Plaintiff's Motion for Judgment Debtor Exam.pdf
JM_FJD_2315-2491	2015-0710 Reply iso Motion for Debtor Examination with exhibits.pdf
JM_FJD_2493-2508	2015-0720 Defendant's Reply in support of Motion for Protective Order.pdf
JM_FJD_2509-2511	2015-0723 Request for Hearing.pdf
JM_FJD_2512-2514	2015-0909 Notice of Change of Firm Affiliation.pdf
JM_FJD_2515-2517	2015-0914 Request for Submission.pdf
JM_FJD_2518-2520	2015-0922 Order to Set for Hearing.pdf
JM_FJD_2521	2015-1007 Hearing Date Memo.pdf
JM_FJD_2522-2525	2015-1106 Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents.pdf
JM_FJD_2526-2533	2015-1112 Notice of Entry.Order Debtor Exam.pdf
JM_FJD_2534-2536	2015-1215 Errata to Motion to Withdraw as Counsel.pdf
JM_FJD_2537-2562	2015-1228 Opposition to Motion to Withdraw.pdf
JM_FJD_2563-2565	2016-0107 Amended Order Granting Motion to Withdraw as Counsel.pdf
JM_FJD_2566-2574	2016-0113 Affidavit of Severin Carlson in response to Amended Order Granting Motion to Withdraw.pdf
JM_FJD_2575-2584	2016-0113 Motion for Order to Show Cause and Ex Parte Motion for Order Shortening Time.pdf
JM_FJD_2585-2591	2016-0113 NOE.Amended Order Granting Motion to Withdraw as Counsel.pdf
JM_FJD_2592-2598	2016-0113 NOE.Order Granting Motion to Withdraw as Counsel.pdf
JM_FJD_2599-2604	2016-0114 Request for Submission.Order Shortening Time.pdf
JM_FJD_2605-2607	2016-0122 Order to Show Cause.pdf
JM_FJD_2608-2610	2016-0125 Notice of Taking Judgment Debtor's Examination.pdf
JM_FJD_2611-2613	2016-0203 Order Holding Defendant in Contempt of Court.pdf

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Bates #	Name
JM_FJD_2614-2615	2016-0203 Warrant of Arrest.pdf
JM_FJD_2616-2652	2016-0222 Declaration of Adam P. McMillen
JM_FJD_2653-2954	2016-0503 Motion to Void Deeds, Assign Property, etc. with exhibits
JM_FJD_2955-2956	2016-0503 Order Granting Plaintiff's Motion for Deposition of Alborz Zandian
JM_FJD_2957-2962	2016-0504 Notice of Entry of Order.Alborz Zandian Deposition
JM_FJD_2963-2965	2016-0504 Notice to Vacate Deposition
JM_FJD_2966-2981	2016-0602 Notice of Pendency of Chapter 15 Petition for Recognition of a Foreign Proceeding
JM_FJD_2982-2984	2016-0603 Notice of Bankruptcy Filing and Automatic Stay

3. Documents filed in the Nevada Supreme Court, Case No. 65205, identified as follows:

Bates #	Name
JM_SC1_0001-8	2014-0314 Case Appeal Statement.pdf
JM_SC1_0009-16	2014-0314 Docket Entries.pdf
JM_SC1_0017-77	2014-0314 Notice of Appeal.pdf
JM_SC1_0078-80	2014-0314 Notice of Cash Deposit in Lieu of Bond.pdf
JM_SC1_0081	2014-0314 Notice of Referral to Settlement Program and Suspension of Rules.pdf
JM_SC1_0082-83	2014-0318 Notice of Assignment to NRAP 16 Settlement Program.pdf
JM_SC1_0084-92	2014-0325 DOCKET SHEET.pdf
JM_SC1_0093-101	2014-0404 Attachment 1 to Docketing Statement.pdf
JM_SC1_0102-112	2014-0404 Attachment 2 to Docketing Statement.pdf
JM_SC1_0113-127	2014-0404 Attachment 3 to Docketing Statement.pdf
JM_SC1_0128-137	2014-0404 Docketing Statement.pdf
JM_SC1_0138	2014-0404 Issued Notice to Provide Proof of Service on Settlement Judge.pdf
JM_SC1_0139-141	2014-0407 Affidavit of Service.pdf
JM_SC1_0142-150	2014-0410 Docket Sheet.pdf
JM_SC1_0151	2014-0422 Settlement Program Early Case Assessment Report.set conf 5.27.14.pdf
JM_SC1_0152-160	2014-0423 Docket Entries.pdf
JM_SC1_0161	2014-0424 Settlement Program Status Report.corrected 5.21.14.pdf
JM_SC1_0162-170	2014-0502 Docket Entries.pdf
JM_SC1_0171-179	2014-0514 Docket Entries.pdf
JM_SC1_0180-188	2014-0515 Docket Entries.pdf
JM_SC1_0189-197	2014-0520 Docket Entries.pdf
JM_SC1_0198-207	2014-0528 Docket Entries.pdf
JM_SC1_0208	2014-0530 No Settlement Report.pdf
JM_SC1_0209-210	JM_SC1_0209-210 2014-0604 Order Reinstating Briefing.pdf
JM_SC1_0211-213	2014-0605 Notice to File Document.Settlement Program Survey.pdf
JM_SC1_0214-222	2014-0612 Docket Entries.pdf
JM_SC1_0223-225	2014-0619 Certificate of No Transcript Request.pdf
JM_SC1_0226-234	2014-0619 Docket Entries.pdf

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Bates #	Name
JM_SC1_0235-244	2014-0702 Docket Entries.pdf
JM_SC1_0245-254	2014-0709 Docket Entries.pdf
JM_SC1_0255-264	2014-0717 Docket Entries.pdf
JM_SC1_0265-274	2014-0724 Docket Entries.pdf
JM_SC1_0275-283	2014-0729 Docket Entries.pdf
JM_SC1_0284-293	2014-0801 Docket Entries.pdf
JM_SC1_0294-303	2014-0806 Docket Entries.pdf
JM_SC1_0304-315	2014-0808 Docket Entries.pdf
JM_SC1_0316-325	2014-0812 Docket Entries.pdf
JM_SC1_0326-335	2014-0819 Docket Entries.pdf
JM_SC1_0336	2014-0828 Order Granting Telephonic Extension.pdf
JM_SC1_0337-340	2014-0909 Document Part Declaration of Jason Woodbury in Support of Motion for Extension of Time.pdf
JM_SC1_0341-345	2014-0909 Motion for Extension of Time to File Opening Brief and Appendix.pdf
JM_SC1_0346	2014-0911 Order Granting Motion for Extension of Time.pdf
JM_SC1_0347-349	2014-1009 Stipulation to Extend Deadline for Filing Brief and Appendix.pdf
JM_SC1_0350-351	2014-1015 Order Granting Extension.pdf
JM_SC1_0352-551	2014-1016 Joint Appendix Volume 1.pdf
JM_SC1_0552-793	2014-1016 Joint Appendix Volume 2.pdf
JM_SC1_0794-1015	2014-1016 Joint Appendix Volume 3.pdf
JM_SC1_1016-1135	2014-1016 Joint Appendix Volume 4.pdf
JM_SC1_1136-1137	2014-1017 Affidavit of Service - JA.pdf
JM_SC1_1138-1171	2014-1017 Appellant's Opening Brief.file stamped.pdf
JM_SC1_1172-1173	2014-1020 Affidavit of Service - Opening Brief.pdf
JM_SC1_1174-1183	2014-1022 Docket Entries.pdf
JM_SC1_1184-1193	2014-1105 Docket Entries.pdf
JM_SC1_1194-1203	2014-1113 Docket Entries.pdf
JM_SC1_1204-1236	2014-1117 Respondent's Answering Brief.pdf
JM_SC1_1237-1405	2014-1117 Respondent's Appendix.Volume I.Part 1.pdf
JM_SC1_1406-1417	2014-1117 Respondent's Appendix.Volume I.Part2.pdf
JM_SC1_1418-1594	2014-1117 Respondent's Appendix.Volume II.Part1.pdf
JM_SC1_1595-1661	2014-1117 Respondent's Appendix.Volume II.Part2.pdf
JM_SC1_1662	2014-1217 Filed Order Granting Telephonic Extension.pdf
JM_SC1_1663-1682	2014-1223 Appellant's Reply Brief.pdf
JM_SC1_1683-1693	2015-0112 Docket Entries.pdf
JM_SC1_1694	2015-0123 Order Submitting Appeal for Decision Without Oral Argument.pdf
JM_SC1_1695-1697	2015-0203 Notice of Appearance.Severin Carlson.pdf
JM_SC1_1698-1707	2015-0303 Docket Entries.pdf
JM_SC1_1708-1717	2015-0616 Docket Entries.pdf
JM_SC1_1718-1728	2015-0721 Docket Entries.pdf
JM_SC1_1729-1739	2015-0914 Docket Entries.pdf
JM_SC1_1740-1750	2015-0928 Docket Entries.pdf
JM_SC1_1751-1761	2015-1009 Docket Entries.pdf
JM_SC1_1762-1764	2015-1019 Filed Order of Affirmance.pdf

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Bates #	Name
JM_SC1_1765-1768	2015-1130 Filed Remittitur Received 11-16-15.pdf

4. Documents filed in the Nevada Supreme Court, Case No. 65960, identified as follows:

Bates #	Name
JM_SC2_0001-7	2014-0623 Case Appeal Statement.pdf
JM_SC2_0008-10	2014-0623 Notice of Cash Deposit in Lieu of Bond.pdf
JM_SC2_0011-70	2014-0630 Notice of Appeal.Order Allowing Costs and Disbursements.pdf
JM_SC2_0071-72	2014-0630 Notice of Referral to Settlement Program and Suspension of Rules.pdf
JM_SC2_0073-82	2014-0702 Docket Entries.pdf
JM_SC2_0083	2014-0707 Exemption from Settlement Program Notice to File Documents.pdf
JM_SC2_0084-93	2014-0709 Docket Entries.pdf
JM_SC2_0094-103	2014-0717 Docket Entries.pdf
JM_SC2_0104-106	2014-0722 Certificate of No Transcript.pdf
JM_SC2_0107-150	2014-0722 Docketing Statement.with attachments.pdf
JM_SC2_0151-160	2014-0724 Docket Entries.pdf
JM_SC2_0161-169	2014-0729 Docket Entries.pdf
JM_SC2_0170-181	2014-0808 Docket Entries.pdf
JM_SC2_0182-191	2014-0812 Docket Entries.pdf
JM_SC2_0192-201	2014-0819 Docket Entries.pdf
JM_SC2_0202-211	2014-1022 Docket Entries.pdf
JM_SC2_0212	2014-1104 Order Granting Telephonic Extension to file Opening Brief and Appendix.pdf
JM_SC2_0213-222	2014-1105 Docket Entries.pdf
JM_SC2_0223-426	2014-1112 Joint Appendix Vol. I (NSC 65960).pdf
JM_SC2_0427-619	2014-1112 Joint Appendix Vol. II (NSC 65960).pdf
JM_SC2_0620-745	2014-1112 Joint Appendix Vol. III (NSC 65960).pdf
JM_SC2_0746-886	2014-1112 Joint Appendix Vol. IV (NSC 65960).pdf
JM_SC2_0887-909	2014-1113 Appellant's Opening Brief.pdf
JM_SC2_0910-919	2014-1113 Docket Entries.pdf
JM_SC2_0920-921	2014-1124 Affidavit of Service.pdf
JM_SC2_0922-924	2014-1211 Stipulation to Extend Deadline for Filing of Respondent's Answering Brief and Appendix.pdf
JM_SC2_0925-926	2014-1218 Order Granting Motion.pdf
JM_SC2_0927-937	2015-0112 Docket Entries.pdf
JM_SC2_0938-955	2015-0120 Respondent's Answering Brief.pdf
JM_SC2_0956-1033	2015-0120 Respondent's Appendix.Part 1.pdf
JM_SC2_1034-1071	2015-0120 Respondent's Appendix.Part 2.pdf
JM_SC2_1072-1099	2015-0120 Respondent's Appendix.Part 3.pdf

Bates #	Name
JM_SC2_1100-1101	JM_SC2_1100-1101 2015-0203 Notice of Appearance.Severin Carlson.pdf
JM_SC2_1102-1103	2015-0219 Stipulation to Extend Deadline to File Appellant's Reply Brief.pdf
JM_SC2_1104-1113	2015-0303 Docket Entries.pdf
JM_SC2_1114-1133	2015-0306 Appellant's Reply Brief.pdf
JM_SC2_1134	2015-0414 Order Submitting Appeal for Decision Without Oral Argument.pdf
JM_SC2_1135-1144	2015-0616 Docket Entries.pdf
JM_SC2_1145-1155	2015-0721 Docket Entries.pdf
JM_SC2_1156-1166	2015-0724 Docket Entries.pdf
JM_SC2_1167-1177	2015-0914 Filed Copy of Docket Entries.pdf
JM_SC2_1178-1188	2015-0922 Docket Entries.pdf
JM_SC2_1189-1199	2015-0928 Docket Entries.pdf
JM_SC2_1200-1202	2015-1009 Filed Copy of Docket Entries.pdf
JM_SC2_1203-1205	2015-1019 Filed Order of Affirmance.pdf
JM_SC2_1206-1209	2015-1113 Issued Remittitur.pdf
JM_SC2_1210-1213	2015-1130 Filed Remittitur.pdf

5. All documents disclosed by Plaintiffs and other parties.

6. All documents necessary for impeachment or rebuttal.

MARGOLIN reserves the right to supplement and revise these document disclosures as new information is discovered, in accordance with the Federal Rules of Civil Procedure.

### III. DESCRIPTION AND COMPUTATION OF DAMAGES

MARGOLIN has been damaged as indicated by the Judgment in the First Judicial District Court, the cloud on title on the properties at issue in this action and the fees and costs associated with collecting on the Judgment and defending this action.

MARGOLIN reserves the right to supplement his computation of damages upon a full opportunity for discovery and expert consultation.

### IV. INSURANCE AGREEMENTS UNDER WHICH ANY PERSON CARRYING ON AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY PART OR ALL OF A JUDGMENT WHICH MAY BE ENTERED IN THE ACTION OR TO INDEMNIFY OR REIMBURSE FOR PAYMENTS MADE TO SATISFY THE JUDGMENT

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MR. MARGOLIN is currently unaware of any insurance agreements as described in Rule 26(a)(1)(A)(iv). If, after further investigation, MR. MARGOLIN discovers any such insurance agreements, he will disclose them to the other parties.

DATED: September 21, 2017.                      BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Adam McMillen  
Adam P. McMillen, Esq.  
Nevada Bar No. 10678  
5371 Kietzke Lane  
Reno, Nevada 89511  
*Attorneys for Defendant and Cross-Defendant  
Jed Margolin*

**CERTIFICATE OF SERVICE**

Pursuant to *FRCP 5(b)*, I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and on this 21<sup>st</sup> day of September, 2017, I served the document entitled **INITIAL DISCLOSURES OF JED MARGOLIN**, along with a CD containing the disclosed documents, on the parties listed below via the following:

Jeffrey L. Hartman, Esq.  
Hartman & Hartman  
510 West Plumb Lane, Suite B  
Reno, Nevada 89509  
[notices@bankruptcyreno.com](mailto:notices@bankruptcyreno.com);  
[sji@bankruptcyreno.com](mailto:sji@bankruptcyreno.com)  
Attorney for Patrick Canet

Yanxiong Li, Esq.  
Wright, Finlay & Zak, LLP  
7785 W. Sahara Avenue, Suite 200  
Las Vegas, NV 89117  
[yli@wrightlegal.net](mailto:yli@wrightlegal.net)  
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*

**VIA FIRST CLASS U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery to the foregoing.

**VIA FACSIMILE:** by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number as last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by the facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which it was transmitted.

**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf.

**VIA COURIER:** by delivering a copy of the document to a courier service for over-night delivery to the foregoing parties.

**VIA ELECTRONIC SERVICE:** by electronically filing the document with the Clerk of the Court using the ECF system which served the foregoing parties electronically.

/s/ Nancy R. Lindsley  
Employee of Brownstein Hyatt Farber Schreck, LLP

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