

Exhibit D

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7
8 **IN THE UNITED STATES BANKRUPTCY COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 In Re JAZI GHOLAMREZA ZANDIAN,
11 Debtor.

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

Adversary No. 17-05016-BTB

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

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 PATRICK CANET,

24 Counterclaimant,

25 v.

26 FRED SADRI, INDIVIDUALLY AND AS
TRUSTEE FOR THE STAR LIVING
27 TRUST; RAY KOROGHLI,
INDIVIDUALLY; RAY KOROGHLI
AND SATHSOWI T. KOROGHLI, AS
28 MANAGING TRUSTEES FOR

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1 KOROGHLI MANAGEMENT TRUST,
 2 Counter-Defendants.
 3 _____ /
 4 PATRICK CANET,
 5 Cross-Claimant,
 6 v.
 7 JED MARGOLIN,
 8 Cross-Defendant.

DEFENDANT JED MARGOLIN’S FIRST SET OF REQUESTS FOR PRODUCTION TO PATRICK CANET

11 Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Jed Margolin
12 (“MARGOLIN”) hereby requests that Counterclaimant/Cross-Claimant Patrick Canet
13 (“CANET”) serve responses and documents in response to the following Requests within thirty
14 (30) days of service hereof. These Requests are considered continuing and therefore CANET is
15 required to supplement his responses and document production whenever he obtains different or
16 additional knowledge, information, belief or documents relative to these Requests.

I. DEFINITIONS AND GUIDELINES

18 MARGOLIN incorporates by reference the Definitions and Guidelines contained in his
19 First Set of Interrogatories to Plaintiffs.

II. REQUESTS FOR PRODUCTION

REQUEST NO. 1:

22 Produce all Documents and things Relating To any non-privileged Documents, Writings,
23 and Communications between You and ZANDIAN Relating To this adversary proceeding, the
24 subject matter of this adversary proceeding, and/or the FRENCH ACTION.

REQUEST NO. 2:

26 Produce all Documents and things Relating To any non-privileged Documents, Writings,
27 and Communications between You and SADRI Relating To this adversary proceeding, the
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1 subject matter of this adversary proceeding, and/or the FRENCH ACTION.

2 **REQUEST NO. 3:**

3 Produce all Documents and things Relating To any non-privileged Documents, Writings,
4 and Communications between You and RAY KOROGHLI Relating To this adversary
5 proceeding, the subject matter of this adversary proceeding, and/or the FRENCH ACTION.

6 **REQUEST NO. 4:**

7 Produce all Documents and things Relating To any non-privileged Documents, Writings,
8 and Communications between You and SATHSOWI T. KOROGHLI Relating To this adversary
9 proceeding, the subject matter of this adversary proceeding, and/or the FRENCH ACTION.

10 **REQUEST NO. 5:**

11 Produce all Documents and things Relating To any non-privileged Documents, Writings,
12 and Communications between You and KMT Relating To this adversary proceeding, the subject
13 matter of this adversary proceeding, and/or the FRENCH ACTION.

14 **REQUEST NO. 6:**

15 Produce any and all contracts or agreements You have with any Person(s) Relating To the
16 FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your Cross-Claim.

17 **REQUEST NO. 7:**

18 Produce any and all contracts or agreements You have with ZANDIAN Relating To the
19 FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your Cross-Claim.

20 **REQUEST NO. 8:**

21 Produce any and all contracts or agreements You have with SADRI Relating To the
22 FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your Cross-Claim.

23 **REQUEST NO. 9:**

24 Produce any and all contracts or agreements You have with RAY KOROGHLI Relating
25 To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your Cross-
26 Claim.

27 **REQUEST NO. 10:**

28 Produce any and all contracts or agreements You have with SATHSOWI T. KOROGHLI

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1 Relating To the FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your
2 Cross-Claim.

3 **REQUEST NO. 11:**

4 Produce any and all contracts or agreements You have with KMT Relating To the
5 FRENCH ACTION, Your Chapter 15 Petition, Your Counterclaim, and/or Your Cross-Claim.

6 **REQUEST NO. 12:**

7 Produce all Documents, Communications, and Writings Relating To all actions You have
8 taken anywhere in the world to collect the judgment against ZANDIAN that resulted from the
9 FRENCH ACTION.

10 **REQUEST NO. 13:**

11 Produce all Documents, Writings, and Communications that You received from, or sent
12 to, Bank Melli in the FRENCH ACTION.

13 **REQUEST NO. 14:**

14 Produce all Documents, Communications, and Writings which discuss or show why You
15 waited approximately 18 years after You obtained Your Judgment against ZANDIAN in the
16 FRENCH ACTION to attempt to satisfy Your Judgment against ZANDIAN in Nevada.

17 **REQUEST NO. 15:**

18 Produce any and all agreements and contracts You have with ZANDIAN relating to the
19 recovery or acquisition of any real property that is the subject of this adversary proceeding.

20 **REQUEST NO. 16:**

21 Produce all Documents and things Relating To any non-privileged Documents, Writings,
22 and Communications that support Your FIRST CROSS CLAIM.

23 **REQUEST NO. 17:**

24 Produce all Documents and things Relating To any non-privileged Documents, Writings,
25 and Communications that support paragraph 67 of Your FIRST CROSS CLAIM.

26 **REQUEST NO. 18:**

27 Produce all Documents and things Relating To any non-privileged Documents, Writings,
28 and Communications that support paragraph 68 of Your FIRST CROSS CLAIM.

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1 **REQUEST NO. 19:**

2 Produce all Documents and things Relating To any non-privileged Documents, Writings,
3 and Communications that support paragraph 69 of Your FIRST CROSS CLAIM.

4 **REQUEST NO. 20:**

5 Produce all Documents and things Relating To any non-privileged Documents, Writings,
6 and Communications that support Your SECOND CROSS CLAIM.

7 **REQUEST NO. 21:**

8 Produce all Documents and things Relating To any non-privileged Documents, Writings,
9 and Communications that support paragraph 71 of Your FIRST CROSS CLAIM.

10 **REQUEST NO. 22:**

11 Produce all Documents, Communications, and Writings Relating To any and all responses
12 contained in Your responses to Defendant Jed Margolin's First Set of Interrogatories to Patrick
13 Canet.

14 **REQUEST NO. 23:**

15 Produce all Documents, Communications, and Writings identifying the debtors and
16 amounts owed in the FRENCH ACTION that is the basis of Your Chapter 15 Petition.

17 **REQUEST NO. 24:**

18 Produce all Documents, Communications, and Writings supporting Your assertion that
19 Bank Melli's claim against ZANDIAN in the FRENCH ACTION that is the basis of Your
20 Chapter 15 Petition has been approved.

21 **REQUEST NO. 25:**

22 Produce all Documents, Communications, and Writings Relating To ZANDIAN's (or
23 Computer World's) debt to Bank Melli including the purpose for incurring the debt.

24 **REQUEST NO. 26:**

25 Produce all Documents, Communications, and Writings Relating To the amount of money
26 that You have already received from ZANDIAN in the FRENCH ACTION or otherwise.

27 **REQUEST NO. 27:**

28 Produce all Documents, Communications, and Writings Related To Your attempt(s) to

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1 collect Your Judgment against ZANDIAN in the FRENCH ACTION.

2 **REQUEST NO. 28:**

3 Produce all Documents, Communications, and Writings Related To Your attempt(s) to
4 collect Your Judgment in the FRENCH ACTION against ZANDIAN in Switzerland.

5 **REQUEST NO. 29:**

6 Produce all Documents, Communications, and Writings Related To Your attempt(s) to
7 collect Your Judgment against ZANDIAN in the FRENCH ACTION in Nevada.

8 **REQUEST NO. 30:**

9 Produce all Documents, Communications, and Writings Related To Your attempt(s) to
10 collect Your Judgment against ZANDIAN in the FRENCH ACTION anywhere else in the United
11 States.

12 **REQUEST NO. 31:**

13 Produce all Documents, Communications, and Writings Related To Your attempt(s) to
14 collect Your Judgment against ZANDIAN in the FRENCH ACTION in any other country.

15 **REQUEST NO. 32:**

16 Produce all Documents, Communications, and Writings Related To any and all
17 agreements You have with ZANDIAN (whether written or oral) Relating To Your Chapter 15
18 Petition and/or this adversary proceeding.

19 **REQUEST NO. 33:**

20 Produce all agreements You have with SADRI Relating To Your Chapter 15 Petition
21 and/or this adversary proceeding.

22 **REQUEST NO. 34:**

23 Produce all agreements You have with RAY KOROGHLI Relating To Your Chapter 15
24 Petition and/or this adversary proceeding.

25 **REQUEST NO. 35:**

26 Produce all agreements You have with SATHSOWI T. KOROGHLI Relating To Your
27 Chapter 15 Petition and/or this adversary proceeding.

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REQUEST NO. 36:

Produce all agreements You have with KMT Relating To Your Chapter 15 Petition and/or this adversary proceeding.

DATED: This 19th day of January, 2018.

BROWNSTEIN HYATT FARBER SCHRECK, LLP



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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 19th day of January, 2018, I served the document entitled **DEFENDANT JED MARGOLIN'S FIRST SET OF REQUESTS FOR PRODUCTION TO PATRICK CANET** on the parties listed below via the following:

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, addressed as follows:

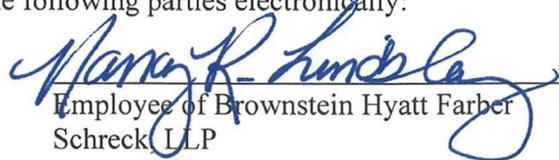
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BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

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 following parties electronically:


Employee of Brownstein Hyatt Farber
Schreck LLP

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