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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.

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

16 Plaintiffs,

17 v.

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

20 Defendants.

21 PATRICK CANET,

22 Counterclaimant,

23 v.

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

27 Counter-Defendants.
28 _____ /

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

Adversary No. 17-05016-BTB

RESPONSE OF DEFENDANT AND
CROSS-DEFENDANT JED MARGOLIN
TO PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION
OF DOCUMENTS

1 PATRICK CANET,
2 Cross-Claimant,
3 v.
4 JED MARGOLIN,
5 Cross-Defendant.

6
7 TO: Plaintiffs and their attorneys of record:
8 Defendant and Cross-Defendant JED MARGOLIN, hereinafter referred to as
9 (“Margolin”), by and through counsel, hereby responds to Plaintiffs’ First Set of Requests for
10 Production of Documents to Jed Margolin.
11

12 **GENERAL OBJECTIONS AND RESPONSE**

13 Margolin asserts and incorporates the following general objections as to each and every
14 Request, whether or not they are repeated as to any specific Request below.
15

16 Margolin objects to the Requests to the extent they seek information or documents that
17 are protected from disclosure by any privilege or immunity, including the attorney-client
18 privilege, the work product doctrine, or any other privilege, doctrine or immunity available by
19 law. To the extent the Requests can be construed to seek privileged or protected documents or
20 information, Margolin asserts said privilege or protection, objects to the request, and will
21 provide only non-privileged, non-protected documents or information, if any. Any inadvertent
22 disclosure of any privileged information shall not be deemed or construed as a waiver of any
23 privilege or right of Margolin.
24

25 1. In responding to the Requests, Margolin does not waive, nor intend to waive,
26 any privilege or objection, including but not limited to, any objection to relevancy, materiality,
27 or admissibility of any of its responses or the subject matter addressed therein. No incidental
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1 or implied admissions are intended by the responses. The fact that Margolin has answered part
2 or all of any request contained in these Requests is not intended to be, and shall not be
3 construed as, a waiver by Margolin of any part of any objection to any Requests.

4 2. Margolin objects to the Requests to the extent they seek information that is
5 neither relevant to the parties' claims or defenses in the pending action, nor reasonably
6 calculated to lead to the discovery of admissible evidence.

7 3. Margolin objects to the Requests to the extent that they seek to impose duties or
8 burdens on him that are inconsistent with or in addition to those required by the Federal Rules of
9 Civil Procedure (the "Rules"). To the extent there is any inconsistency between a particular
10 request and the Rules, Margolin will comply with the Rules. Margolin specifically objects to
11 the Requests to the extent they seek discovery beyond the scope permitted by the Rules,
12 including but not limited to, the extent that what is sought is not both relevant to the actual
13 claims and defenses in the Lawsuit and proportional to the needs of the case as measured by the
14 factors set forth in the Rules.

15 4. Margolin objects to the Requests to the extent they are vague, ambiguous, overly
16 broad, not appropriately limited in temporal scope, unreasonably cumulative or duplicative, or
17 to the extent that compliance with the Requests would be unduly burdensome or oppressive.

18 5. Margolin objects to the Requests to the extent that they seek materials or
19 information already known to or in the possession of Plaintiffs. Margolin objects to each
20 Request to the extent it seeks electronically stored information from sources that are not
21 reasonably accessible because of undue burden or cost.

22 6. Margolin objects to each Request to the extent that it contains express or implied
23 assumptions of fact or law with respect to matters at issue in this action. Margolin's responses
24

1 and objections to the Requests are not intended to, and shall not, be construed as an agreement
2 by Margolin with Plaintiffs' characterization of any facts.

3 7. All of Margolin's responses to these Requests are based upon information
4 currently available after a reasonable, good faith investigation. Margolin objects to these
5 Requests to the extent that discovery is ongoing and it is likely that some facts are not yet
6 known to Margolin. Margolin expressly reserves his right to supplement and amend these
7 responses and objections as discovery proceeds.

8 8. Margolin objects to the Requests to the extent that the Requests seek documents
9 that are confidential or contain Margolin's proprietary information. Discovery activity in this
10 case does involve production of certain confidential or proprietary information for which special
11 protection from public disclosure and from use for any purpose other than prosecuting this
12 litigation is warranted. Margolin will designate as "CONFIDENTIAL" or "CONFIDENTIAL –
13 ATTORNEY EYES ONLY" under those documents he produces that contain confidential or
14 proprietary information.

15 9. Margolin's decision to provide a Response notwithstanding the objectionable
16 nature of the Request should not be construed as: (a) an admission that the material is relevant;
17 (b) a waiver of the General Objections or the objections asserted in response to the specific
18 Request; or (c) an agreement that Requests for similar information will be treated in a similar
19 manner. Margolin reserves the right to assert additional objections to the Requests as
20 appropriate. Margolin specifically reserves all objections as to the competency, relevancy,
21 materiality, and admissibility of their Response or the subject matter thereof, all objections as to
22 burden, vagueness, over breadth and ambiguity, and all rights to object on any ground to the use
23 of any Response, or the subject matter thereof, in any proceedings, including without limitation
24 the trial of this, or any other, action.
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1 Subject to the foregoing objections, and the more specific objections set forth below,
2 Margolin responds and objects as follows:

3 **DOCUMENT REQUESTS**

4 **REQUEST FOR PRODUCTION NO. 1:**

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6 Any and all Documents YOU sent to or received from Plaintiffs or their attorneys, agents,
7 employees or representatives regarding the Property, prior to and after the Execution Sale.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

9 Objection. The request is unduly burdensome and only calculated to harass an annoy
10 Margolin. The request itself indicates that Plaintiffs or their attorneys have possession of all
11 documents requested.
12

13 Without waiving his objections, Margolin supplements his initial disclosures with his First
14 Supplemental Disclosure and produces responsive documents set forth below.

15

Description	Bates Number
11/22/16 10:10 a.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000720
11/28/16 8:57 p.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000721
12/02/16 10:38 a.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000722
12/05/16 10:12 a.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000723
12/06/16 10:46 a.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000724
12/12/16 10:23 a.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000725
12/29/16 1:01 p.m. - Voice message from Sadri Fabiborz left on J. Margolin's	JM_000726

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telephone	
02/09/17 10:14 a.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000727
05/04/17 1:03 p.m. - Voice message from Sadri Fabiborz left on J. Margolin's telephone	JM_000728
11/05/17 12:18 p.m. - Voice message from Sadri Fred left on J. Margolin's telephone	JM_000729
Email from Margolin to Fred Sadri dated November 21, 2016	JM_000730
Email from Margolin to Fred Sadri dated November 21, 2016 transmitting Warrant for Arrest of Zandian	JM_000731
Email from Fred Sadri to Margolin dated November 22, 2016	JM_000732
Email from Margolin to Fred Sadri dated November 22, 2016	JM_000733
Email from Fred Sadri to Margolin dated November 23, 2016 re Fayeghi	JM_000734
Email from Margolin to Fred Sadri dated November 28, 2016 re service on Zandian in France	JM_000735-736
Email from Margolin to Fred Sadri dated November 21, 2016	JM_0803
Email from Margolin to Fred Sadri dated November 21, 2016	JM_0804
Email from Fred Sadri to Margolin dated November 22, 2016	JM_0805
Email from Margolin to Fred Sadri dated November 22, 2016	JM_0808
Email from Fred Sadri to Margolin dated November 23, 2016	JM_0811
Email from Margolin to Fred Sadri dated November 28, 2016	JM_0817
Email from Fredi Sadri to Margolin dated December 5, 2016	JM_0827
Email from Reza to Adam McMillen dated April 19, 2016	JM_0838-841

REQUEST FOR PRODUCTION NO. 2:

Any and all Documents YOU sent to or received from Zandian or his attorneys, agents,

1 employees or representatives regarding the Property, prior to and after the Execution Sale.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

3 Objection, the request is unduly burdensome and oppressive and is not reasonably limited
4 in its subject matter or time. Without waiving said objection, and without prejudice to produce
5 additional documents as discovery progresses, Margolin states as follows:

6 See Initial Disclosures of Defendant Jed Margolin served September 21, 2017; First
7 Supplemental Disclosures of Defendant Jed Margolin served January 2, 2018; and, document
8 identified as Bates No. JM_SC1_0208.

9 **REQUEST FOR PRODUCTION NO. 3:**

10 Any and all Documents YOU sent to or received from Sheriff or his attorneys, agents,
11 employees or representatives regarding the Property, prior to and after the Execution Sale.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

13 Objection, a request seeking any and all documents to support a broad contention is
14 unduly burdensome and oppressive. Without waiving said objection, and without prejudice to
15 produce additional documents as discovery progresses, Margolin states as follows:

16 See Initial Disclosures of Defendant Jed Margolin served September 21, 2017; First
17 Supplemental Disclosures of Defendant Jed Margolin served January 2, 2018; and, documents
18 identified as follows:

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_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
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

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JM_0674-676	Sheriff's Certificate of Sale.Washoe Co APN 084-130-07.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
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_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

REQUEST FOR PRODUCTION NO. 4:

Any and all title insurance policies, reports or products in YOUR possession for the Property.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Objection, this request is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, Margolin is not in possession of any such requested documents.

REQUEST FOR PRODUCTION NO. 5:

Any and all Documents which support YOUR contention that the Execution Sale was valid.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Objection, a request seeking any and all documents to support a broad contention is unduly burdensome and oppressive. Without waiving said objection, and without prejudice to produce additional documents as discovery progresses, Margolin states as follows:

See Initial Disclosures of Defendant Jed Margolin served September 21, 2017; First Supplemental Disclosures of Defendant Jed Margolin served January 2, 2018; and, documents identified as follows:

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_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
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_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

REQUEST FOR PRODUCTION NO. 6:

Any and all Documents which support YOUR contention that the Sheriff or its agents and assigns complied with all statutory notice requirements in conducting the Execution Sale.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

See response to Request for Production No. 5 above.

1 **REQUEST FOR PRODUCTION NO. 7:**

2 Produce all Documents reflecting, relating to, or concerning the Execution Sale against
3 the Property.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

5 Objection, work product and attorney-client privilege. To the extent that the request seeks
6 documents prepared in anticipation of litigation, or is a communication among counsel and Mr.
7 Margolin, those documents are privileged and will not be produced.

8 Objection, vague and ambiguous. The request is so overly broad using imprecise terms
9 (reflecting, relating to, or concerning) that the scope of the request is not reasonably tailored for
10 Margolin to provide a response.

11 Without waiving such objections, *see* Initial Disclosures of Defendant Jed Margolin
12 served September 21, 2017; First Supplemental Disclosures of Defendant Jed Margolin served
13 January 2, 2018; and, response to Request for Production No. 5 above.

14 **REQUEST FOR PRODUCTION NO. 8:**

15
16 Produce all Documents regarding any rent or other income received by YOU related to the
17 Property, including any and all lease or rental agreements regarding the Property that YOU have
18 entered into prior to or after the Execution Sale.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

20 Margolin is not in possession of any such documents.

21 **REQUEST FOR PRODUCTION NO. 9:**

22 Produce all Documents that YOU referenced, identified, referred to, or consulted in
23 responding to Plaintiffs' First Set of Interrogatories to YOU.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

25 *See* Initial Disclosures of Defendant Jed Margolin served September 21, 2017; and,
26 Supplemental Disclosures of Defendant Jed Margolin served January 2, 2018.
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1 **REQUEST FOR PRODUCTION NO. 10:**

2 Produce YOUR entire file regarding or related to the Property.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

4 Objection, the request is unduly burdensome, oppressive, and constitutes harassment. The
5 requires fails to comply with Federal Rule 34(a)(1)(A) which requires the requesting party
6 narrowly to designate the thing sought to be produced. Here, the requesting party has said “give
7 me everything you have about this case.” Such a request is not proper under the Rules of Civil
8 Procedure.

9 Objection, work product and attorney client privilege. Insofar as the breadth of the
10 request also seeks attorney work product and communications among counsel and client, the
11 same is objectionable.

12 **REQUEST FOR PRODUCTION NO. 11:**

13 Provide all Documents YOU reviewed, prior to the Execution Sale, from the Plaintiffs,
14 Zandian, Sheriff, or any third-party relating to the Execution Sale of the Property.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

16 *See* Initial Disclosures of Defendant Jed Margolin served September 21, 2017; and,
17 Supplemental Disclosures of Defendant Jed Margolin served January 2, 2018.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 Produce all Documents in YOUR possession demonstrating that any party with claim in
20 the Property was/were aware, or should have been aware, of the Auction of the Property.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

22 Objection, argumentative and not reasonably likely to lead to the discovery of admissible
23 evidence. NRS 21.130 provides the means by which notice of a sale due to a writ of execution is
24 to be accomplished. Other than publication (which is evidenced by the proofs of publication
25 produced), no additional notice to any third party is required by law.
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1 **REQUEST FOR PRODUCTION NO. 13:**

2 Produce all Documents in YOUR possession demonstrating amounts YOU have spent to
3 maintain, repair, or improve the Property.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

5 The subject property is vacant and bare land. Margolin has spent no money to maintain,
6 repair or improve the property.

7 **REQUEST FOR PRODUCTION NO. 14:**

8
9 Produce all Documents in YOUR possession demonstrating amounts YOU have paid for
10 all taxes, insurance and homeowners' association dues on the Property.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

12 Real property taxes were paid via Bank of America Online Banking to Washoe County
13 Treasurer NV Washoe APN's: 079-150-10, 084-040-02 & 084-130-07, Bates Numbered
14 JM_0842-847. There have been no insurance premiums or homeowners' association dues paid.

15 **REQUEST FOR PRODUCTION NO. 15:**

16 Provide a copy of any agreement(s) or contract(s) identified in YOUR Response to
17 Interrogatory No. 16.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

19 None exist.

20
21 **REQUEST FOR PRODUCTION NO. 16:**

22
23 Provide a copy of any written instruction or disclosure given to YOU at the Execution
24 Sale.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

26 None.

1 **REQUEST FOR PRODUCTION NO. 17:**

2 Provide all Documents related to policies of hazard insurance on the Property, including
3 proof of payment by YOU of all premiums and any claims made upon the Policies.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

5 None exist.

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7 **REQUEST FOR PRODUCTION NO. 18:**

8
9 For each response to the Request for Admissions that is not an unqualified admission,
10 produce any and all Documents which support YOUR response.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

12 Objection, this request is compound, and is unduly burdensome and oppressive.

13 **REQUEST FOR PRODUCTION NO. 19:**

14 Produce any and all valuations, broker's price opinions (BPOs), and appraisals of the
15 Property, created before or after YOU purchased the Property.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

17 None exist.

18 **REQUEST FOR PRODUCTION NO. 20:**

19
20 Produce all Documents that identify what YOU believed to be the fair market value of the
21 Property at the time of YOUR purchase of the Property, including the reasons for YOUR belief.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

23 Objection, the request is not properly a request for production where it requests that

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“reasons for YOUR belief” are being solicited.

DATED: This 2nd day of January 7, 2018

BROWNSTEIN HYATT FARBER SCHRECK, LLP



Matthew D. Francis
Nevada Bar No. 6978
Arthur A. Zorio
Nevada Bar No. 6547
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775.324.4100

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 2nd day of January, 2018, served the document entitled **RESPONSE OF DEFENDANT AND CROSS-DEFENDANT JED MARGOLIN TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** 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:

Jeffrey L. Hartman, Esq.
Hartman & Hartman
510 West Plumb Lane, Suite B
Reno, Nevada 89509
notices@bankruptcyreno.com;
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
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*

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