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

1 KOROGHLI MANAGEMENT TRUST,
2 Counter-Defendants.

3 _____ /
4 PATRICK CANET,
5 Cross-Claimant,

6 v.

7 JED MARGOLIN,
8 Cross-Defendant.

9
10 **DEFENDANT JED MARGOLIN'S FIRST SET**
11 **OF INTERROGATORIES TO PLAINTIFFS**

12 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Jed Margolin
13 ("MARGOLIN") hereby requests that Plaintiffs FRED SADRI, AS TRUSTEE FOR THE STAR
14 LIVING TRUST, DATED APRIL 14, 1997; RAY KOROGHLI AND SATHSOWI T.
15 KOROGHLI, AS MANAGING TRUSTEES FOR KOROGHLI MANAGEMENT TRUST
16 (collectively "PLAINTIFFS") serve responses to the following Interrogatories within thirty (30)
17 days of service hereof. These Interrogatories are considered continuing and therefore
18 PLAINTIFFS are required to supplement their answers whenever they obtain different or
19 additional knowledge, information or belief relative to the Interrogatories.

20 **I. DEFINITIONS**

21 The following definitions and instructions apply to each of the Interrogatories hereinafter
22 set forth:

23 A. When used herein, the name "ZANDIAN" refers to "JAZI GHOLAMREZA
24 ZANDIAN" and any and all of the other names and aliases he has used, including but not limited
25 to: REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN
26 aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONOREZA ZANDIAN JAZI.

27 B. When used herein, the name "SADRI" includes the names "FRED SADRI,"
28 "FARIBORZ SADRI, and "FRED SADRI, AS TRUSTEE FOR THE STAR LIVING TRUST,"

1 and any other name(s) he uses or entities that he controls.

2 C. When used herein, the name “RAY KOROGHLI” includes the names “RAY
3 KOROGHLI” and “RAY KOROGHLI AS MANAGING TRUSTEE FOR KOROGHLI
4 MANAGEMENT TRUST” and any other entities that he controls.

5 D. When used herein, the name “SATHSOWI T. KOROGHLI” includes
6 “SATHSOWI T. KOROGHLI” and “SATHSOWI T. KOROGHLI AS MANAGING TRUSTEE
7 FOR KOROGHLI MANAGEMENT TRUST.”

8 E. When used herein, the name “KMT” refers to “KOROGHLI MANAGEMENT
9 TRUST.”

10 F. When used herein, the word “COMPLAINT” refers to Your COMPLAINT FOR
11 QUIET TITLE AND DECLARATORY RELIEF filed in this Case 17-05016-btb on May 25,
12 2017.

13 G. When used herein, the name “CANET” refers to Counterclaimant and Cross-
14 Claimant “PATRICK CANET.”

15 H. When used herein, the term “You” and/or “Your” their plural or any synonym
16 thereof, is intended to and shall refer to PLAINTIFFS.

17 I. When used herein, the terms “Communicate,” “Communicated,”
18 “Communications” or “Communications” refer to all conversations, messages, Writings,
19 correspondence, or contacts between any Persons (with the exception of Your attorneys), whether
20 in person, in Writing, electronically, by telephone, or by any other means.

21 J. When used herein, the term “Person” its plural or any synonym thereof, is intended
22 to and shall embrace and include any individual, partnership, corporation, trust, estate, company,
23 association, government agency (federal, state, local or foreign), or any other entity.

24 K. When used herein, the terms “Relate,” “Related To” or “Relating To” mean
25 constituting, comprising, consisting, containing, setting forth, showing, disclosing, describing,
26 explaining, mentioning, evidencing, reflecting, embodying, summarizing, concerning, or referring
27 to, directly or indirectly.

28 L. When used herein, the terms “Document” and “Writing,” and the plural forms

1 thereof, shall mean all written, typewritten, printed, recorded, or graphic matters, however
2 produced or reproduced, of every kind and description, including Electronically-Stored
3 Information pertaining in any way to the subject matter of this action and within the meaning of
4 Rule 34 of the Federal Rules of Civil Procedure. The terms “Document” and “Writing” shall
5 include, but are not limited to, any emails, books, pamphlets, periodicals, memoranda, letters,
6 correspondence, telegrams, applications, leases, memoranda of understanding, agreements,
7 contracts, permits, articles, bylaws, financial records, security instruments, checks, bank
8 statements, receipts, invoices, bids, proposals, offers, counteroffers, time records, accounting
9 records, minutes, records of meetings, reports, notes, diaries, logs, tapes, transcripts, recordings,
10 records of phone calls, work papers, charts, drawings, photographs, or any other written, recorded
11 or graphic matter, however produced or reproduced, including all non-identical copies containing
12 notations not contained on the original thereof, and including all disks, diskettes, flash drives,
13 thumb drives, portable drives, compact disks, tapes or other recordings used in data and/or word
14 processing, together with the programming instructions and other materials necessary to
15 understand such media, capable of being retrieved from a computer, in Your possession, custody
16 or control. Documents shall also include original or non-identical copies of such items, in both
17 final and draft form, of every kind and nature whatsoever, that are within Your possession,
18 custody or control, or that are known by You to exist. Writing shall also include handwriting,
19 typewriting, printing, photo stating, photographing, photocopying, transmitting by electronic mail
20 or facsimile, and every other means of recording upon any tangible thing, any form of
21 communication or representation, including letters, words, pictures, sounds, or symbols, or
22 combinations thereof, and any record thereby created, regardless of the manner in which the
23 record has been stored.

24 M. As used in these Requests, the term “Electronically-Stored Information” refers to
25 all information created, manipulated, communicated, stored, and best utilized in digital form,
26 requiring the use of computer hardware and software.

27 II. GUIDELINES

28 A. Whenever the phrase “State in Detail” or “Describe in Detail” is used in these

1 Interrogatories, You are required to set forth every fact, consideration, factor, circumstance, act,
2 omission, event, transaction, occurrence, or statement which supports, refutes, concerns, relates
3 to, or refers to the matter about which information is sought.

4 B. Whenever the term "Identify" or "Identification" is used in these Interrogatories
5 with respect to an individual person, You are required to state: the full name of each such person;
6 his or her last known residential address; his or her last known business address; and his or her
7 present or last known job title, job description, and the dates during which the job position was
8 held. Once a person has been identified in an answer to an interrogatory, it shall be sufficient
9 thereafter when identifying that person merely to state his or her name.

10 C. Whenever the term "Identify" or "Identification" is used in these Interrogatories
11 with respect to any corporation, limited liability company, partnership, or business entity, You are
12 required to state: its present or last known full name; all of its previous registered and/or
13 operating business names, if any; its present or last known business address; and the nature of its
14 business. Once a corporation, limited liability, partnership, or business entity has been identified
15 in an answer to an interrogatory, it shall be sufficient thereafter when identifying such entity
16 merely to state its name.

17 D. Whenever the terms "Identify," "Identity" or "Identification" are used in these
18 Interrogatories with respect to a Document or Documents, You are required to:

- 19 (1) Describe the type of Document, e.g., letter, memorandum, report, diary,
20 chart, etc.;
- 21 (2) Provide the date, if any, of the Document;
- 22 (3) Identify the author(s) of the Document;
- 23 (4) Identify each addressee appearing on the Document;
- 24 (5) Identify each recipient of the Document or any copies of the Document;
- 25 (6) Describe the contents of the Document;
- 26 (7) Describe the present location of the Document; and
- 27 (8) Identify the Person(s) having possession, control, or custody of the
28 Document. If any such Document was, but is no longer in Your possession, custody or control,

1 state what disposition was made of it; and if such Document was destroyed, or alleged to have
2 been destroyed, state the date of and reason for its destruction, the Identity of each person having
3 knowledge of its destruction, and each person responsible for its destruction. For each
4 interrogatory that requests the identification of Document(s), You may produce for inspection and
5 copying, true and correct copies of the Document(s) as kept in the usual course of business,
6 organized and labeled to correspond with the categories in this request, all in accordance with
7 Rule 33(c) of the Federal Rules of Civil Procedure, and such production of copies will be
8 accepted as complying with such request.

9 E. Whenever the terms “Identify,” “Identity,” or “Identification” is used in these
10 Interrogatories with respect to an oral communication, You are required to:

- 11 (1) State the date and place of such communication;
- 12 (2) Identify the Person(s) who initiated said communication;
- 13 (3) Identify each Person who participated in or was present at any part of or all
14 of said communication, or who became privy to the substance of said communication;
- 15 (4) Describe in Detail the purpose, content and substance of said
16 communication; and
- 17 (5) State whether said communication occurred in person or by telephone, or if
18 both, the method by which each individual participated.

19 F. Should You deem any information requested by any of the following
20 Interrogatories to be privileged, You shall specify that a claim of privilege is being made, briefly
21 state the grounds on which the claim of privilege rests, and Identify who is making the claim of
22 privilege.

23 G. All Documents and Writings are to be produced which are in Your possession,
24 custody or control, or can be ascertained upon reasonable investigation within Your control. The
25 knowledge of Your attorneys is deemed to be Your knowledge, so that, apart from privileged
26 matters, if Your attorneys have knowledge of Documents or Writings sought to be elicited herein,
27 said Documents and Writings must be incorporated into Your answers, even if such information
28 is unknown to You.

1 H. If You do not know or have the information requested in any or all of the
2 following discovery, please be prepared to identify the Person who, to the best of Your
3 knowledge, would know or have the answer or information requested.

4 **III. INTERROGATORIES**

5 **INTERROGATORY NO. 1:**

6 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
7 Communications between the PLAINTIFFS, or any of them, Relating To MARGOLIN, any court
8 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
9 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

10 **INTERROGATORY NO. 2:**

11 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
12 Communications between SADRI and RAY KOROGHLI Relating To MARGOLIN, any court
13 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
14 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

15 **INTERROGATORY NO. 3:**

16 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
17 Communications between SADRI and SATHSOWI T. KOROGHLI Relating To MARGOLIN,
18 any court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and
19 any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

20 **INTERROGATORY NO. 4:**

21 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
22 Communications between SADRI and KMT Relating To MARGOLIN, any court judgment
23 MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any lawsuit
24 between MARGOLIN and ZANDIAN, from December 2007 to present.

25 **INTERROGATORY NO. 5:**

26 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
27 Communications between RAY KOROGHLI and SATHSOWI T. KOROGHLI Relating To
28 MARGOLIN, any court judgment MARGOLIN has against ZANDIAN, any patent owned by

1 MARGOLIN, and any lawsuit between MARGOLIN and ZANDIAN, from December 2007 to
2 present.

3 **INTERROGATORY NO. 6:**

4 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
5 Communications between RAY KOROGHLI and KMT Relating To MARGOLIN, any court
6 judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
7 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

8 **INTERROGATORY NO. 7:**

9 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
10 Communications between SATHSOWI T. KOROGHLI and KMT Relating To MARGOLIN, any
11 court judgment MARGOLIN has against ZANDIAN, any patent owned by MARGOLIN, and any
12 lawsuit between MARGOLIN and ZANDIAN, from December 2007 to present.

13 **INTERROGATORY NO. 8:**

14 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
15 Communications between any of the PLAINTIFFS Relating To any purchase or potential
16 purchase of any court judgment MARGOLIN has against ZANDIAN

17 **INTERROGATORY NO. 9:**

18 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
19 Communications that Relate to ZANDIAN receiving any payment of any money or other
20 consideration from "Pico Holdings."

21 **INTERROGATORY NO. 10:**

22 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
23 Communications that Relate to any payment of any money or other consideration from any
24 PLAINTIFF to ZANDIAN.

25 **INTERROGATORY NO. 11:**

26 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
27 Communications that support Your FIRST CAUSE OF ACTION contained in Your
28 COMPLAINT.

1 **INTERROGATORY NO. 12:**

2 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
3 Communications that support Your SECOND CAUSE OF ACTION contained in Your
4 COMPLAINT.

5 **INTERROGATORY NO. 13:**

6 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
7 Communications that support Your THIRD CAUSE OF ACTION contained in Your
8 COMPLAINT.

9 **INTERROGATORY NO. 14:**

10 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
11 Communications that support the PRAYER for relief contained in Your COMPLAINT.

12 **INTERROGATORY NO. 15:**

13 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
14 Communications that support paragraph 23 of Your COMPLAINT.

15 **INTERROGATORY NO. 16:**

16 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
17 Communications that support paragraph 24 of Your COMPLAINT.

18 **INTERROGATORY NO. 17:**

19 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
20 Communications that support paragraph 34 of Your COMPLAINT.

21 **INTERROGATORY NO. 18:**

22 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
23 Communications that support paragraph 38 of Your COMPLAINT.

24 **INTERROGATORY NO. 19:**

25 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
26 Communications that support paragraph 39 of Your COMPLAINT.

27 **INTERROGATORY NO. 20:**

28 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and

1 Communications that support paragraph 40 of Your COMPLAINT.

2 **INTERROGATORY NO. 21:**

3 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
4 Communications that support paragraph 43 of Your COMPLAINT.

5 **INTERROGATORY NO. 22:**

6 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
7 Communications that support paragraph 44 of Your COMPLAINT.

8 **INTERROGATORY NO. 23:**

9 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
10 Communications that support paragraph 45 of Your COMPLAINT.

11 **INTERROGATORY NO. 24:**

12 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
13 Communications that support paragraph 46 of Your COMPLAINT.

14 **INTERROGATORY NO. 25:**

15 Identify and Describe in Detail all facts and non-privileged Documents, Writings, and
16 Communications that support paragraph 47 of Your COMPLAINT.

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DATED: This 19th day of January, 2018.

BROWNSTEIN HYATT FARBER SCHRECK, LLP



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Attorneys for JED MARGOLIN

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 INTERROGATORIES TO PLAINTIFFS** 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:

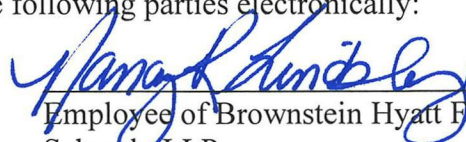
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BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual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