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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

12 **Adversary No. 17-05016-BTB**

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 PATRICK CANET,  
23

Counterclaimant,

24 v.

25 FRED SADRI, INDIVIDUALLY AND AS  
26 TRUSTEE FOR THE STAR LIVING  
TRUST; RAY KOROGHLI,  
27 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 REQUESTS FOR ADMISSIONS TO PLAINTIFFS**

12 Pursuant to Rule 36 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") produce responses pursuant to these Requests within thirty (30)  
17 days of service hereof. These Requests are considered continuing and therefore PLAINTIFFS are  
18 required to supplement their answers whenever they obtain different or additional knowledge or  
19 information relative to these Requests.

20 **I. DEFINITIONS AND GUIDELINES**

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

23 **II. REQUESTS FOR ADMISSIONS**

24 **REQUEST NO. 1:**

25 Admit that a Judgment Confirming Arbitration Award was recorded in Washoe County in  
26 June 2007 as Doc # 4747575.

27 **REQUEST NO. 2:**

28 Admit that the Order on Stipulation For Final Resolution of Litigation ("Stipulated

1 Agreement”) was not recorded in Washoe County until September 2017 (Washoe County Doc #  
2 4747575).

3 **REQUEST NO. 3:**

4 Admit that three of the properties in Washoe County (APN 079-150-10, APN 084-04002,  
5 and APN 084-130-07) that MARGOLIN bought at public auction were subject to the Judgment  
6 Confirming Arbitration Award that was recorded in Washoe County in June 2007 as Doc #  
7 4747575.

8 **REQUEST NO. 4:**

9 Admit that the auction where MARGOLIN purchased the properties that are the subject of  
10 Your Adversary Complaint was conducted in April of 2015.

11 **REQUEST NO. 5:**

12 Admit that You had knowledge that MARGOLIN had obtained a Writ of Execution  
13 against the properties that are the subject of Your Adversary Complaint.

14 **REQUEST NO. 6:**

15 Admit that You had knowledge that a Sheriff’s auction was to be held before the auction  
16 was held.

17 **REQUEST NO. 7:**

18 Admit that since at least 2013 You have stated on one or more occasions an interest in  
19 purchasing MARGOLIN’s Judgment against Zandian either wholly or in part but that You have  
20 never made an offer.

21 **REQUEST NO. 8:**

22 Admit that You have had one or more communications with Zandian since the CANET  
23 Chapter 15 Petition was filed in U.S. Bankruptcy Court in May of 2016.

24 **REQUEST NO. 9:**

25 Admit that You have produced all Documents and things pursuant to Defendant Jed  
26 Margolin’s First Set of Requests for Production to Plaintiffs.

27 **REQUEST NO. 10:**

28 Admit that all Documents and things You have produced pursuant to Defendant Jed

1 Margolin’s First Set of Requests for Production to Plaintiffs are authentic.

2 **REQUEST NO. 11:**

3 Admit that MARGOLIN did properly record a copy of the Default Judgment at the  
4 Washoe County Recorder’s Office in accordance with NRS 17.150.

5 **REQUEST NO. 12:**

6 Admit that, prior to the execution sales, other than publication (which is evidenced by the  
7 proofs of publication produced in discovery by MARGOLIN), no additional notice to any third  
8 party is required by law.

9 **REQUEST NO. 13:**

10 Admit that prior to execution sales, no notice was required to be served upon SLT and/or  
11 KMT.

12 **REQUEST NO. 14:**

13 Admit the Sheriff’s sales, referred to in paragraph 39 of the COMPLAINT, were valid.

14 **REQUEST NO. 15:**

15 Admit that an affidavit referred to in NRS 17.150(4) is not required for a lien to be valid.

16 **REQUEST NO. 16:**

17 Admit that NRS 17.150(2) makes it clear that a lien on real property comes into existence  
18 upon the recordation of the judgment.

19 **REQUEST NO. 17:**

20 Admit that the Nevada Supreme Court in *Leven v. Frey*, 123 Nev. 399, 403 (2007) stated  
21 “NRS 17.150(2) creates a lien on a debtor’s real property in a particular county when a judgment  
22 is recorded in that county.”

23 **REQUEST NO. 18:**

24 Admit that because a notice of the Sheriff’s sale was published in accord with NRS

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27 ///

28 ///

1 21.130(1)(c)(3), You received notice of the execution sale.

2

3 DATED: This 19<sup>th</sup> day of January, 2018.

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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 19<sup>th</sup> day of January, 2018, I served the document entitled **DEFENDANT JED MARGOLIN'S FIRST SET OF REQUESTS FOR ADMISSIONS 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:

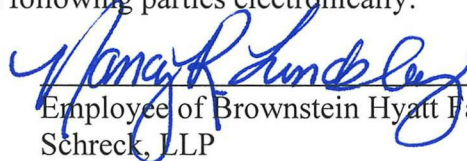
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**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual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

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