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*Attorneys for Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli individually; Ray Koroghli and Sathsowi T. Koroghli, as Managing Trustees for Koroghli Management Trust*

9 **UNITED STATES BANKRUPTCY COURT**  
10 **DISTRICT OF NEVADA**

11 In re: JAZI GHOLAMREZA ZANDIAN,  
12 Debtor.

**Case No.: N-16-50644-btb**

**CHAPTER 15**

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

**Adv. No. 17-05016-btb**

**FIRST SET OF REQUESTS FOR  
ADMISSIONS TO JED MARGOLIN**

19 Plaintiffs,

20 vs.

21 JED MARGOLIN; JAZI GHOLAMREZA  
22 ZANDIAN; and all other parties claiming an  
23 interest in real properties described in this  
24 action,

25 Defendants.

26 PATRICK CANET,

27 Counterclaimant,

28 vs.

FRED SADRI INDIVIDUALLY AND IN HIS  
CAPACITY AS TRUSTEE OF THE STAR

1 LIVING TRUSTAND RAY KOROGHLI  
2 INDIVIDUALLY, AND RAY KOROGHLI  
3 AND SATHSOWI T. KOROGHLI AS  
4 MANAGING TRUSTEES OF THE  
5 KOROGHLI MANAGEMENT TRUST,

6 Counter-Defendants.

7 PATRICK CANET,

8 Cross-Claimant,

9 v.

10 JED MARGOLIN,

11 Cross-Defendant.

12 Pursuant to the Federal Rules of Civil Procedure (F.R.C.P.) Rule 36, Plaintiff/Counter-  
13 Defendants, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust,  
14 dated April 14, 1997; Ray Koroghli individually; Ray Koroghli and Sathsowi T. Koroghli, as  
15 Managing Trustees for Koroghli Management Trust request that Defendant, Jed Margolin  
16 respond to this First Set of Requests for Admissions within thirty (30) days from the date of  
17 service.

18 **DEFINITIONS**

19 **A.** The following definitions apply to this discovery request:

- 20 **1.** Communication. The term “communication” means the transmittal or information (in  
21 the form of facts, ideas, inquiries, or otherwise) and shall embrace and include all  
22 written communications and other communications including without limitation every  
23 discussion, conversation, conference, meeting, interview, telephone call, or doctor,  
24 and any other professional service visit.
- 25 **2.** Concerning. The term “concerning” means relating to, referring to, describing,  
26 evidencing or constituting.
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3. YOU, YOUR, and Margolin. As used herein, unless otherwise indicated, the terms “YOU,” “YOUR” and “Margolin” refer to Defendant Jed Margolin and any and all of his agents, representatives, employees, partners, and counsels.
4. Document or Documents. The term “Document” or “Documents” is defined to be synonymous in meaning and equal in scope to the use of the terms “document” and “electronically stored information” in Federal Rules of Civil Procedure 26 and 34. A draft or non-identical copy is a separate document within the meaning of this term.
5. Identify (with respect to documents). When referring to documents, “identify” means to provide information, to the extent known, as to the (a) type of document; (b) general subject matters; (c) date of the document; (d) author(s), addressee(s) and recipient(s) of the document; and (e) location of the document with sufficient particularity to allow for it to be obtained by means of a request for production for that document.
6. Identify (with respect to persons or entities). When referring to a person or entity, “identify” means to provide information, to the extent known, as to the person or entity’s full name, present or last known address, zip code, and telephone number. When referring to a natural person, “identify” also means to provide information as to the last known place of employment, business address, and telephone number. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.
7. Parties. The terms “Plaintiff,” “Defendant,” as well as a party’s full or abbreviated name or a pronoun referring to a party means the party and, where applicable, its agents, representatives, officers, directors, employees, partners, corporate parent, subsidiaries, and affiliates.
8. Person. The term “Person” is defined as any natural person or business, legal, or governmental entity or association.

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- 9. Property. The term “Property” refers to Parcels 2, 4 and 8 as defined under Paragraph 1 in Plaintiffs’ Complaint filed in this action on May 25, 2017 [ECF No.1].
- 10. Debtor or Zandian. The terms “Debtor” or “Zandian” refers to Jazi Gholamreza Zandian, the Chapter 15 Debtor in Case No. 16-50644-btb before the U.S. Bankruptcy Court for Nevada.
- 11. Foreign Representative or Canet. The terms “Foreign Representative” and “Canet” refers to Patrick Canet, in his capacity as Foreign Representative in Case No. 16-50644-btb before the U.S. Bankruptcy Court for Nevada.
- 12. Sheriff or Wood. The terms “Sheriff” or “Wood” refers to Steven Wood or any other agent of Sheriff, Chuck Allen, conducting sale on behalf of YOU for the Property.
- 13. JCAA. The abbreviation “JCAA” refers to the Judgment Confirmation Arbitration Award recorded on June 22, 2007 in the official records of Washoe County Recorder’s Office as Instrument Number 3547263.
- 14. Quitclaim Deed. The term “Quitclaim Deed” refers to the Quitclaim Claim Deed recorded on May 12, 2009 in the official records of Washoe County Recorder’s Office as Instrument Number 3758659.
- 15. Clark Stipulated Judgment. The term “Clark Stipulated Judgment” refers to the Stipulation for Final Resolution of Litigation recorded on July 20, 2009 in the official records of Clark County Recorder’s Office as Instrument Number 20090720-0003600.
- 16. Washoe Default Judgment. The term “Washoe Default Judgment” refers to the Default Judgment recorded by YOU on August 16, 2013 in the official records of Washoe County Recorder’s Office as Instrument Number 4269631.
- 17. Clark Default Judgment. The term “Clark Default Judgment” refers to the Default Judgment recorded by YOU on August 20, 2013 in the official records of Elko County Recorder’s Office as Instrument Number 201308200001370.



- 1 2. If YOU object to furnishing any information requested by these Requests for Admissions  
2 on the grounds of privilege, work product or otherwise, YOUR response should state the  
3 existence of the information, document or communication, identify the specific grounds  
4 on which YOUR objection is based, and identify the information objected to by  
5 furnishing its date, participants (*e.g.*, names of speakers, authors, addressees) and a  
6 general description of the nature, rather than the substance, of the purportedly privileged  
7 information. If the information objected to contains relevant non-objectionable matter,  
8 YOU should disclose it.
- 9 3. The relevant time period of these Requests for Admission is from December 2006 to the  
10 date of the response, and shall include all information which relates or refers to this  
11 period, unless another time or period of time is specifically referred to a Request for  
12 Admission.
- 13 4. If YOU cannot furnish exact data, such as dates, periods or amounts, supply estimated  
14 date to the extent possible and indicate that the data is estimated.

15 **REQUESTS FOR ADMISSIONS**

16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that none of the JCAA did not convey any interest to Zandian.

18 **REQUEST FOR ADMISSION NO. 2:**

19 Admit that none of the Quitclaim Deed attached to the JCAA appear in executed form on  
20 title to the Property.

21 **REQUEST FOR ADMISSION NO. 3:**

22 Admit that YOU did not record any Affidavit of Judgment required under NRS 17.150(4)  
23 with the Washoe Default Judgment.

24 **REQUEST FOR ADMISSION NO. 4:**

25 Admit that YOU did not send any notice of the Execution Sale to Plaintiff Star Living  
26 Trust.

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1 **REQUEST FOR ADMISSION NO. 5:**

2 Admit that YOU did not send any notice of the Execution Sale to Plaintiff Koroghli  
3 Management Trust.

4 **REQUEST FOR ADMISSION NO. 6:**

5 Admit that at the time of the Execution Sale, YOU were a professional real estate  
6 investor who routinely purchased properties at such judgment execution sales conducted by  
7 YOU or others.

8 **REQUEST FOR ADMISSION NO. 7:**

9 Admit that YOU had notice of the Clark Stipulated Judgment knowledge at the time you  
10 recorded the Clark Default Judgment.

11 **REQUEST FOR ADMISSION NO. 8:**

12 Admit that YOU had notice of the Quitclaim Deed at the time you recorded the Washoe  
13 Default Judgment.

14 **REQUEST FOR ADMISSION NO. 9:**

15 Admit that YOU had knowledge prior to the Execution Sale that YOU would obtain only  
16 Zandian's one-third undivided ownership interest in the Property.

17 **REQUEST FOR ADMISSION NO. 10:**

18 Admit that YOU routinely obtain information from title companies regarding Property  
19 prior to the Execution Sale.

20 **REQUEST FOR ADMISSION NO. 11:**

21 Admit that YOU contacted a title insurance company regarding marketable title for the  
22 Property.

23 **REQUEST FOR ADMISSION NO. 12:**

24 Admit that YOU were the only bidder to bid on the Property at the Execution Sale.

25 **REQUEST FOR ADMISSION NO. 13:**

26 Admit that, at the time of the Execution Sale, the auctioneer did not indicate the Property  
27 was sold free and clear of any co-ownership claim or interest.

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1 **REQUEST FOR ADMISSION NO. 14:**

2 Admit that YOU have no personal knowledge regarding whether the Sheriff sent any  
3 notice to Plaintiff Star Living Trust.

4 **REQUEST FOR ADMISSION NO. 15:**

5 Admit that YOU have no personal knowledge regarding whether the Sheriff sent any  
6 notice to Plaintiff Koroghli Management Trust.

7 **REQUEST FOR ADMISSION NO. 16:**

8 Admit that the deed YOU received as a result of the Execution Sale was made expressly  
9 without warranty as to title.

10 **REQUEST FOR ADMISSION NO. 17:**

11 Admit that the purchase price at the Execution Sale was less than 20% of the fair market  
12 value of the Property at the time of that sale.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that YOU have received income from YOUR interest in the Property.

15 **REQUEST FOR ADMISSION NO. 19:**

16 Admit that YOU have no evidence that Plaintiffs were notified of the Execution Sale  
17 prior to that sale.

18 DATED this 28th day of November, 2017.

19 WRIGHT, FINLAY & ZAK, LLP

20 /s/ Yanxiong Li, Esq.

21 Dana Jonathon Nitz, Esq.

22 Federal Bar No. 0050

23 Yanxiong Li, Esq.

24 Federal Bar No. 12807

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26 Las Vegas, Federal 89117

27 *Attorneys for Plaintiffs/Counter-Defendants, Fred*  
28 *Sadri, both in his individual capacity and as Trustee*  
*for The Star Living Trust, dated April 14, 1997; Ray*  
*Koroghli individually; Ray Koroghli and Sathsowi*  
*T. Koroghli, as Managing Trustees for Koroghli*  
*Management Trust*



1 **CERTIFICATE OF SERVICE**

2 Pursuant to F.R.C.P. 5(b), I certify that I am an employee of WRIGHT, FINLAY &  
3 ZAK, LLP, and that on this 28th day of November, 2017, I did cause a true copy of **FIRST SET**  
4 **OF REQUESTS FOR ADMISSIONS TO JED MARGOLIN** to be served by depositing it in  
5 U.S. Mail, postage prepaid, to the addresses below:

6  
7 Matthew D. Francis, Esq..  
8 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
9 5371 Kietzke Lane  
10 Reno, NV 89511  
11 *Attorney for Jed Margolin*

12 Jeffrey L. Hartman, Esq.  
13 HARTMAN & HARTMAN  
14 510 West Plumb Lane, Suite B1  
15 Reno, NV 89509  
16 *Attorney for Patrick Canet, Foreign Representativa*  
17 *and Jazi Gholamreza Zandian*

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/s/ Kelli Wightman  
An Employee of WRIGHT, FINLAY & ZAK, LLP