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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.

BK-N-16-50644-BTB  
Chapter 15

Adversary Proceeding: 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,

**DECLARATION OF ADAM P. MCMILLEN IN**  
**SUPPORT OF CROSS-DEFENDANT JED**  
**MARGOLIN'S MOTION FOR SUMMARY**  
**JUDGMENT AGAINST CROSS-CLAIMANT**  
**PATRICK CANET**

17 Plaintiffs,

Hearing Date: May 24, 2018  
Hearing Time: 10 a.m.

18 v.

19 JED MARGOLIN; JAZI GHOLAM REZA  
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

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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.

9 I, Adam P. McMillen do hereby declare and state as follows:

10 1. I am an attorney at the Law Offices of Karl H. Smith. Prior to joining the Smith law  
11 firm, I was an attorney at the law firm of Brownstein Hyatt Farber Schreck, LLP (“BHFS”),  
12 where I was counsel of record for Mr. Margolin in this action. Prior to my tenure at BHFS, I was  
13 an attorney at the law firm of Watson Rounds. I have personal knowledge of the facts which are  
14 hereinafter related and make this Declaration on the basis of such personal knowledge. If called  
15 to testify at any hearing or trial regarding the above-matter, I swear I could testify competently to  
16 the matters stated herein. This Declaration is made in support of Jed Margolin’s Statement of  
17 Undisputed Facts in Support of Cross-Defendant Jed Margolin’s Motion for Summary Judgment  
18 Against Cross-Claimant Patrick Canet and Cross-Defendant Jed Margolin’s Motion for Summary  
19 Judgment Against Cross-Claimant Patrick Canet.

20 2. On December 9, 2014, I attended a public auction at the Regional Justice Center at 200  
21 Lewis Street, Las Vegas, Nevada 89101 for the sale of APN 071-02-000-005. On December 9,  
22 2014, I was the highest bidder for APN 071-02-000-005, and purchased that real property on Jed  
23 Margolin’s behalf for \$8,000. Attached hereto as Exhibit A is a true and correct copy of a  
24 Sheriff’s Certificate of Sale of Property for APN 071-02-000-005 in Clark County, Nevada.

25 3. On April 3, 2015, I attended a public auction at the Second Judicial District Court at 75  
26 Court Street, Reno, Nevada 89501 for the sale of APN 084-130-07. On April 3, 2015, I was the  
27 highest bidder for APN 084-130-07, and purchased that real property on Jed Margolin’s behalf for  
28

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1 \$3,000. Attached hereto as Exhibit B is a true and correct copy of a Sheriff's Certificate of Sale  
2 of Property for APN 084-130-07 in Washoe County, Nevada.

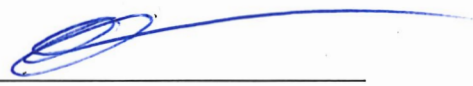
3 4. On April 3, 2015, I attended a public auction at the Second Judicial District Court at 75  
4 Court Street, Reno, Nevada 89501 for the sale of APN 079-150-10. On April 3, 2015, I was the  
5 highest bidder for APN 079-150-10, and purchased that real property on Jed Margolin's behalf for  
6 \$5,000. Attached hereto as Exhibit C is a true and correct copy of a Sheriff's Certificate of Sale  
7 of Property for APN 079-150-10 in Washoe County, Nevada.

8 5. On April 3, 2015, I attended a public auction at the Second Judicial District Court at 75  
9 Court Street, Reno, Nevada 89501 for the sale of APN 084-040-02. On April 3, 2015, I was the  
10 highest bidder for APN 084-040-02, and purchased that real property on Jed Margolin's behalf for  
11 \$5,000. Attached hereto as Exhibit D is a true and correct copy of a Sheriff's Certificate of Sale  
12 of Property for APN 084-040-02 in Washoe County, Nevada.

13 6. On April 3, 2015, I attended a public auction at the Second Judicial District Court at 75  
14 Court Street, Reno, Nevada 89501 for the sale of APN 079-150-12. On April 3, 2015, I was the  
15 highest bidder for APN 079-150-12, and purchased that real property on Jed Margolin's behalf for  
16 \$15,000. Attached hereto as Exhibit E is a true and correct copy of a Sheriff's Certificate of Sale  
17 of Property for APN 079-150-12 in Washoe County, Nevada.

18 I declare under penalty of perjury that the foregoing is true and correct.

19 DATED: This 20<sup>th</sup> day of March, 2018.

20 By:   
21 Adam P. McMillen

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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 21<sup>st</sup> day of March, 2018, I served the document entitled **DECLARATION OF ADAM MCMILLEN IN SUPPORT OF CROSS-DEFENDANT JED MARGOLIN’S MOTION FOR SUMMARY JUDGMENT AGAINST CROSS-CLAIMANT 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:

Dana Jonathon Nitz, Esq.  
Yanxiong Li, Esq.  
Wright, Finlay & Zak, LLP  
7785 W. Sahara Avenue., Suite 200  
Las Vegas, NV 89117  
[yli@wrightlegal.net](mailto:yli@wrightlegal.net)

Jeffrey L. Harman, Esq.  
HARMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
[notices@bankruptcyreno.com](mailto:notices@bankruptcyreno.com)

**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:

/s/Nancy R. Lindsley  
Employee of Brownstein Hyatt Farber  
Schreck, LLP

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