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10 *Attorneys for Fred Sadri, both in his individual  
11 capacity and as Trustee for The Star Living  
12 Trust, dated April 14, 1997; Ray Koroghli,  
13 individually; and Ray Koroghli and Sathsowi T.  
14 Koroghli, in their individual capacities as well  
15 as Managing Trustees for Koroghli  
16 Management Trust*

11 **UNITED STATES BANKRUPTCY COURT**  
12 **DISTRICT OF NEVADA**

13 In re: JAZI GHOLAMREZA ZANDIAN,  
14 Debtor.

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

**Chapter 15**

Adversary No.: **17-05016-btb**

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

**JOINT MOTION / STIPULATION TO  
EXTEND TIME TO FILE DISPOSITIVE  
MOTIONS**

**[FIRST REQUEST]**

21 Plaintiffs,

22 vs.

23 JED MARGOLIN; JAZI GHOLAMREZA  
24 ZANDIAN; and all other parties claiming an  
25 interest in real properties described in this  
26 action.

27 Defendant.

PATRICK CANET,

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Counter-claimant,  
  
vs.  
  
FRED SADRI INDIVIDUALLY AND IN HIS  
CAPACITY AS TRUSTEE OF THE STAR  
LIVING TRUST AND RAY KOROGHLI  
INDIVIDUALLY, AND RAY KOROGHLI  
AND SATHSOWI T. KOROGHLI AS  
MANAGING TRUSTEES OF THE  
KOROGHLI MANAGEMENT TRUST  
  
Counter-defendant.

PATRICK CANET,  
  
Cross-claimant,  
  
vs.  
  
JED MARGOLIN,  
  
Cross-defendant.

COMES NOW, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and Ray Koroghli and Sathsowi T. Koroghli, in their individual capacities as well as Managing Trustees for Koroghli Management Trust (hereinafter "PLAINTIFF") and Patrick Canet ("CANET") (collectively, the "Parties"), by and through their respective counsels of record, hereby jointly submit this request for an extension of time for filing Dispositive Motions up to and including Monday, May 14, 2018.

The undersigned parties are actively engaged in settlement discussions to resolve Plaintiffs' claims against Canet, Canet's Counterclaims against Plaintiffs, Fred Sadri and Ray

1 Koroghli, and any related defenses, in this action. Parties reasonably believe that additional time  
2 will result in successful settlement of this case in lieu of further motion practice and trial.

3 The parties seek additional time to finalize settlement terms without waiving the right to  
4 filing dispositive motions during the time the agreed upon material settlement terms are reduced  
5 to writing.

6 The parties thus agree that each shall have until May 14, 2018 to file any dispositive  
7 motions on claims and defenses asserted against each other. This agreement shall not affect any  
8 dispositive motions on claims and defenses asserted by or against Defendant, Jed Margolin.

9 This is the parties' first request for extension and is not submitted for the purpose of  
10 causing undue delay or prejudice.

11 DATED this 27th day of March, 2018.

DATED this 27th day of March, 2018.

12 **WRIGHT, FINLAY & ZAK, LLP**

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

13 /s/ Yanxiong Li, Esq.

/s/ Jeffrey L. Hartman, Esq.

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20 Attorneys for *Fred Sadri, both in his individual*  
21 *capacity and as Trustee for The Star Living*  
*Trust, dated April 14, 1997; Ray Koroghli,*  
*individually; and Ray Koroghli and Sathsowi T.*  
*Koroghli, in their individual capacities as well*  
*as Managing Trustees for Koroghli*  
*Management Trust*

Jeffrey L. Hartman, Esq.  
HARTMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
Attorneys for *Patrick Canet*

**CERTIFICATE OF SERVICE**

I, Kelli Wightman, am an employee of Wright, Finlay & Zak, LLP and I certify under penalty of perjury that the foregoing statement is true and correct:

1. On March 28, 2018, I served the following document(s):  
**JOINT MOTION / STIPULATION TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS [FIRST REQUEST]**

2. I served the above-named document(s) by the following means to the persons as listed below:  
(Check all that apply)

a. ECF System (You must attach the “Notice of Electronic Filing”, or list all persons and address and attach additional paper if necessary)

3. On March 28, 2018, I served the above-named document(s) by the following means to the persons as listed below:

■ b. United States mail, postage fully pre-paid (List persons and addresses. Attach additional paper if necessary)

JED MARGOLIN  
c/o Brownstein Hyatt Farber Schreck, LLP  
Attn: Matthew D. Francis, Esq.  
5371 Kietzke Lane  
Reno, NV 89511

JAZI GHOLAMREZA ZANDIAN  
6 RUE EDOUARD FOURNIER  
PARIS

STEVE E. ABELMAN on behalf of Creditor  
JED MARGOLIN  
BROWNSTEIN HYATT FARBER SCHRECK  
410 17th STREET, STE 2200  
DENVER, CO 80241

Jeffrey L. Hartman, Esq.  
HARTMAN & HARTMAN  
510 West Plumb Lane, Suite B  
Reno, NV 89509  
*Attorney for Patrick Canet*

4. That such mailing was accomplished by first class mail, pre-paid, in a sealed envelope.

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

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

Signed on this 28th day of March, 2018.

/s/ Kelli Wightman  
An employee of Wright, Finlay & Zak, LLP