

1 WRIGHT, FINLAY & ZAK, LLP
2 Dana Jonathon Nitz, Esq.
3 Nevada Bar No. 0050
4 Edgar C. Smith, Esq.
5 Nevada Bar No. 5506
6 Yanxiong Li, Esq.
7 Nevada Bar No. 12807
8 7785 W. Sahara Ave., Suite 200
9 Las Vegas, NV 89117
10 (702) 475-7964; Fax: (702) 946-1345
11 yli@wrightlegal.net

Attorneys for Plaintiffs, Fred Sadri, individually 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

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

12 In re: JAZI GHOLAMREZA ZANDIAN,
13
14 Debtor

15 PATRICK CANET,
16 Foreign Representative

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

Chapter 15

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

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

23 Plaintiffs,

24 vs.

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

Defendants

**NOTICE OF HEARING ON
MOTION FOR PARTIAL SUMMARY
JUDGMENT ON PLAINTIFFS'
QUIET TITLE/DECLARATORY
RELIEF CAUSE OF ACTION**

Hearing Date: June 13, 2018

Hearing Time: 2:00 p.m.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PATRICK CANET,

Counterclaimant,

vs.

FRED SADRI, INDIVIDUALLY 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,

Counter-defendants

PATRICK CANET,

Crossclaimant,

vs.

JED MARGOLIN,

Cross-defendant

To: ALL INTERESTED PARTIES

NOTICE IS HEREBY GIVEN that a **MOTION FOR PARTIAL SUMMARY JUDGMENT ON PLAINTIFFS' QUIET TITLE/DECLARATORY RELIEF CAUSE OF ACTION** was filed herein by Yanxiong Li, Esq., attorney for Plaintiffs, Fred Sadri, individually 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. The motion seeks the following relief: Plaintiff seeks an order granting its Quiet Title/Declaratory Relief Cause of Action.

1 Any Opposition must be filed pursuant to Local Rule 9014(d)(1):

2 (1) Except as set out in subsection (3) below, any opposition to a motion
3 must be filed, and service of the opposition must be completed on the
4 movant, no later than fourteen (14) days preceding the hearing date for the
5 motion. The opposition must set forth all relevant facts and any relevant
6 legal authority. An opposition must be supported by affidavits or
7 declarations that conform to the provisions of subsection (c) of this rule.

8 (2) Except as set out in subsection (3) below, any reply memorandum
9 must be filed and served no later than seven (7) days preceding the hearing
10 date.

11 (3) Subsections (d)(1) and (2) do not apply to:

12 (A) Motions for summary judgment brought in any adversary proceeding;

13 (B) Motions for which an order shortening the time for the hearing date
14 has been obtained; and

15 (C) Motions or contested matters for which the court has set a separate
16 briefing schedule either in open court or by separate order.

17 (4) For motions sought to be heard on shortened time, including when
18 such motions are brought in an adversary proceeding, responses and
19 replies will be due as set forth in the order granting the request that the
20 motion be heard on shortened time or as provided in LR 9006.

21 If an objection is not timely filed and served, the relief requested may be granted
22 without a hearing:

23 Local Rule 9014(b)(1): If you object to the relief requested, you must file a **WRITTEN**
24 response to this pleading with the court. You *must* also serve your written response on the
25 person who sent you this notice.

26 If you do not file a written response with the court, or if you do not serve your
27 written response on the person who sent you this notice, then:

- 28
- The court may refuse to allow you to speak at the scheduled hearing; and
 - The court may rule against you without formally calling the matter at the hearing.

1 NOTICE IS FURTHER GIVEN that the hearing on the said Motion will be held before a
2 United States Bankruptcy Judge at the C. Clifton Young Federal Building, Courtroom 2, U.S.
3 Bankruptcy Court, 300 Booth Street, Reno, Nevada on **June 13, 2018, at 2:00 P.M.**

4 DATED this 16th day of April, 2018.

5 WRIGHT, FINLAY & ZAK, LLP

6
7 */s/ Yanxiong Li, Esq.*

8 Dana Jonathon Nitz, Esq.

9 Nevada Bar No. 0050

Edgar C. Smith, Esq.

Nevada Bar No. 5506

Yanxiong Li, Esq.

Nevada Bar No. 12807

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Tel: (702) 475-7964

Fax: (702) 946-1345

Attorneys for Plaintiffs,

Fred Sadri, as Trustee for The Star Living Trust,

dated April 14, 1997; Ray Koroghli and Sathsowi T.

Koroghli, as Managing Trustees for Koroghli

Management Trust

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 April 16, 2018, I served the following document(s):

**NOTICE OF HEARING ON MOTION FOR PARTIAL SUMMARY JUDGMENT
ON PLAINTIFFS' QUIET TITLE/DECLARATORY RELIEF CAUSE OF ACTION**

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)

MATTHEW D. FRANCIS on behalf of Cross Defendant JED MARGOLIN
mfrancis@bhfs.com; nlindsley@bhfs.com , rnofederal@bhfs.com

MATTHEW D. FRANCIS on behalf of Defendant JED MARGOLIN
mfrancis@bhfs.com; nlindsley@bhfs.com , rnofederal@bhfs.com

JEFFREY L HARTMAN on behalf of Cross-Claimant PATRICK CANET
notices@bankruptcyreno.com , sji@bankruptcyreno.com

YANXIONG LI on behalf of Counter-Defendant FRED SADRI
yli@wrightlegal.net , nvbkfiling@wrightlegal.net , jcraig@wrightlegal.net ;
kwightman@wrightlegal.net

YANXIONG LI on behalf of Counter-Defendant RAY KOROGHLI
yli@wrightlegal.net , nvbkfiling@wrightlegal.net , jcraig@wrightlegal.net ;
kwightman@wrightlegal.net

YANXIONG LI on behalf of Counter-Defendant SATHSOWI T. KOROGHLI
yli@wrightlegal.net , nvbkfiling@wrightlegal.net , jcraig@wrightlegal.net ;
kwightman@wrightlegal.net

YANXIONG LI on behalf of Plaintiff FRED SADRI
yli@wrightlegal.net , nvbkfiling@wrightlegal.net , jcraig@wrightlegal.net ;
kwightman@wrightlegal.net

YANXIONG LI on behalf of Plaintiff RAY KOROGHLI
yli@wrightlegal.net , nvbkfiling@wrightlegal.net , jcraig@wrightlegal.net ;
kwightman@wrightlegal.net

YANXIONG LI on behalf of Plaintiff SATHSOWI T. KOROGHLI
yli@wrightlegal.net , nvbkfiling@wrightlegal.net , jcraig@wrightlegal.net ;
kwightman@wrightlegal.net

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ADAM P MCMILLEN on behalf of Cross Defendant JED MARGOLIN
amcmillen@bhfs.com , nlindslev@bhfs.com

ADAM P MCMILLEN on behalf of Defendant JED MARGOLIN
amcmillen@bhfs.com , nlindslev@bhfs.com

ARTHUR ZORIO on behalf of Cross Defendant JED MARGOLIN
azorio@bhfs.com , RenoIDFilings@bhfs.com

ARTHUR ZORIO on behalf of Defendant JED MARGOLIN
azorio@bhfs.com , RenoIDFilings@bhfs.com

3. On April 16, 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.
Attn: Arthur Zorio, 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 16th day of April, 2018.

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