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

15 **UNITED STATES BANKRUPTCY COURT**
16 **DISTRICT OF NEVADA**

17 In re: JAZI GHOLAMREZA ZANDIAN,
18
19 Debtor.

20 Case No.: 16-50644-btb
21 Chapter 15
22 Adversary No.: 17-05016-btb

23 FRED SADRI, AS TRUSTEE FOR THE
24 STAR LIVING TRUST, DATED APRIL 14,
25 1997; RAY KOROGHLI AND SATHSOWI T.
26 KOROGHLI, AS MANAGING TRUSTEES
27 FOR KOROGHLI MANAGEMENT TRUST,

28 **DECLARATION IN SUPPORT OF *EX***
***PARTE* MOTION FOR ORDER**
SHORTENING TIME FOR HEARING
MOTION TO WITHDRAW AS
COUNSEL

29 Plaintiffs,
30 vs.

31 JED MARGOLIN; JAZI GHOLAMREZA
32 ZANDIAN; and all other parties claiming an
33 interest in real properties described in this
34 action.

35 Defendant.

36 PATRICK CANET,
37
38 Counter-claimant,
39 vs.

40 FRED SADRI INDIVIDUALLY AND IN HIS
41 CAPACITY AS TRUSTEE OF THE STAR
42 LIVING TRUST AND RAY KOROGHLI
43 INDIVIDUALLY, AND RAY KOROGHLI

1 AND SATHSOWI T. KOROGHLI AS
2 MANAGING TRUSTEES OF THE
3 KOROGHLI MANAGEMENT TRUST

4 Counter-defendant.

5 PATRICK CANET,

6 Cross-claimant,

7 vs.

8 JED MARGOLIN,

9 Cross-defendant.

10 I, Yanxiong Li, Esq., declare the following:

11 1. I am an employee of Wright, Finlay & Zak, LLP. I am of legal age and I am
12 authorized to sign this declaration on behalf of Wright, Finlay & Zak, LLP.

13 2. On May 19, 2016, the Debtor commenced the underlying Chapter 15 Bankruptcy
14 Case by filing a Petition for Recognition of a Foreign Proceeding. [Bankr. No. 1]

15 3. On May 25, 2017, Plaintiffs, FRED SADRI, AS TRUSTEE FOR THE STAR
16 LIVING TRUST, DATED APRIL 14, 1997 and RAY KOROGHLI AND SATHSOWI T.
17 KOROGHLI, AS MANAGING TRUSTEES FOR KOROGHLI MANAGEMENT TRUST
18 (“Plaintiffs”) filed a complaint, commencing the Adversary Proceeding identified by Case
19 Number 16-50644-btb.

20 4. On September 5, 2019, I contacted counsels for Jed Margolin and for Foreign
21 Representative (Patrick Canet) by phone, and asked if each would consent to the Motion for
22 Withdrawal as Counsel being set for hearing on the same day as the hearing on Mr. Margolin’s
23 Amended Motion to Dismiss – i.e. October 1, 2019 – but immediately following that hearing.

24 5. Both counsels for Mr. Margolin and for Mr. Canet consented.

25 6. On September 11, 2019 at 1:00 PM, Mr. Sadri, the undersigned counsel and Mr.
26 Matthew S. Carter, Esq. attended a teleconference to discuss the firm’s proposal to withdraw as
27 counsel as a result of the September 4, 2019 calls and a failure to reach an agreement regarding
28 any further engagement, during which Mr. Sadri, on behalf of himself and Mr. Koroghli,
accepted WFZ’s proposal to withdraw from representation of Plaintiffs/Counterclaimants, and

1 consented to WFZ's proposal to set hearing of its Motion to Withdraw on the same day, but
2 immediately after hearing on Margolin's Amended Motion to Dismiss.

3 Pursuant to 28 U.S. C. § 1746, I hereby declare under penalty of perjury under the laws
4 of the United States of America that the foregoing is true and correct.

5 DATED this 17th day of September, 2019.

6 WRIGHT, FINLAY & ZAK, LLP

7 /s/ Yanxiong Li
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12 *Attorney for Plaintiffs/Counter-Defendants*
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