	Case 17-05016-btb Doc 76 Entered 11/0	01/19 16:20:56 Page 1 of 4	
1 2 3 4 5 6 7 8 9	Richard F. Holley, Esq. (NV Bar No. 3077) Email: rholley@nevadafirm.com Andrea M. Gandara, Esq. (NV Bar No. 12580) Email: agandara@nevadafirm.com Mary Langsner, Ph.D. (NV Bar No. 13707) Email: mlangsner@nevadafirm.com HOLLEY DRIGGS WALCH FINE PUZEY STEIN & THOMPSON 400 South Fourth Street, Third Floor Las Vegas, Nevada 89101 Telephone: 702/791-0308 Facsimile: 702/791-1912 Attorneys for 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		
10	UNITED STATES BANKRUPTCY COURT		
11	DISTRICT OF NEVADA		
12	In re	Case No. BK-N-16-50644-BTB Chapter 15	
13	GHOLAM REZA JAZI ZANDIAN,		
14	Debtor in Foreign Proceeding.		
15 16 17	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,	Adv. No. 17-05016-BTB NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE	
18	Plaintiffs,		
19	V.	Judge: Hon. Bruce T. Beesley	
20	JED MARGOLIN; JAZI GHOLALREZA ZANDIAN; and all other parties claiming		
21	an interest in the real properties described in this action,		
22 23	Defendants.		
23	PATRICK CANET,		
24	Counterclaimant,		
25 26	V.		
26 27	FRED SADRI, INDIVIDUALLY AND AS		
27 28	TRUSTEE FOR THE STAR LIVING TRUST; RAY KOROGHLI, INDIVIDUALLY, RAY KOROGHLI AND SATHSOWI T. KOROGHLI,		
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1 2 3 4	AS MANAGING TRUSTEES FOR KOROGHLI MANAGEMENT TRUST, Counter-defendants. PATRICK CANET,	
5 6 7 8	Cross-Claimant, v. JED MARGOLIN, Cross-Defendant.	
٥	Dishard F. Hallers Fax, Andres M. Canders Fax, and Max	T D

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Richard F. Holley, Esq., Andrea M. Gandara, Esq., and Mary Langsner, Ph.D. of the law firm of Holley Driggs Walch Fine Puzey Stein & Thompson, attorneys for 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 ("Plaintiffs/Counter-defendants"), hereby enter an appearance on the record in the above-entitled bankruptcy case pursuant to FED. R. BANKR, P. 9010(b), and hereby request special notice of all hearings, actions, contested matters, and adversary proceedings in this bankruptcy case, together with copies of all notices, pleadings, motions, responses, and other related materials that are issued or filed in connection therewith by the Court, Debtor, or other parties in interest, including copies of all plans of reorganization and disclosure statements. All notices and copies in response to the foregoing, and, pursuant to FED. R. BANKR. P. 2002, all notices required to be mailed to Plaintiffs/Counter-defendants pursuant to FED. R. BANKR. P. 2002, should be directed to: Richard F. Holley, Esq., Andrea M. Gandara, Esq., and Mary Langsner, Ph.D. HOLLEY DRIGGS WALCH FINE PUZEY STEIN & THOMPSON 400 South Fourth Street, Third Floor Las Vegas, Nevada 89101 Neither this Notice nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion, nor any other writing or conduct, shall (i) expressly or impliedly designate

- 27 the undersigned as agent for service of process on Plaintiffs/Counter-defendants, or (ii) constitute
- a waiver of any of the following rights of the Plaintiffs/Counter-defendants:

1. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;

2. Right to trial by jury as to any and all matters so triable, whether or not the same be designated legal or private rights, or in any case, controversy, or proceeding relating hereto, notwithstanding the designation of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H) or whether such right is pursuant to statute or the United States Constitution;

3. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding, subject only to Court determination of the application of mandatory or discretionary withdrawal; and

4. Other rights, claims, actions, defenses, setoffs, recoupments, or other matters to which this party is entitled under any agreements, at law, in equity, or under the United States Constitution.

The foregoing are expressly reserved and preserved unto Plaintiffs/Counter-defendants without exception and with no purpose of confessing or conceding jurisdiction in any way by the filing of this Notice or by any other participation in the bankruptcy case identified in the caption above and any related proceedings.

Dated this 1st day of November 2019.

## HOLLEY DRIGGS WALCH FINE PUZEY STEIN & THOMPSON

/s/ Richard F. Holley Richard F. Holley, Esq. Nevada Bar No. 3077 Andrea M. Gandara, Esq. Nevada Bar No. 12580 Mary Langsner, Ph.D. Nevada Bar No. 13707 400 South Fourth Street, Third Floor Las Vegas, Nevada 89101

Attorney for 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

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## **CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Holley, Driggs, Walch, Fine, Puzey, Stein & Thompson, and that on the 1st day of November 2019, I caused to be served a true and correct copy of **NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE** in the following manner:

(ELECTRONIC SERVICE) Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

(OVERNIGHT COURIER) By depositing a true and correct copy of the abovereferenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

(FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

/s/ Olivia Swibies An employee of Holley, Driggs, Walch, Fine, Puzey, Stein & Thompson

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