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7  
 8 *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.*  
 9 *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  
 13 GHOLAM REZA JAZI ZANDIAN,  
 14 Debtor in Foreign Proceeding.

Case No. BK-N-16-50644-BTB  
 Chapter 15

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

Adv. No. 17-05016-BTB

Old Date of Hearing: January 17, 2020  
 Old Time of Hearing: 2:00 PM

18 Plaintiffs,

New Date: January 24, 2020  
 New Time: 1:30 PM

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 Defendants.

23 PATRICK CANET,

24 Counterclaimant,

25 v.

26 FRED SADRI, INDIVIDUALLY AND AS  
 TRUSTEE FOR THE STAR LIVING TRUST;  
 27 RAY KOROGHLI, INDIVIDUALLY, RAY  
 KOROGHLI AND SATHSOWI T. KOROGHLI.  
 28

HOLLEY DRIGGS  
 WALCH | FINE | PUZEY | STEIN | THOMPSON

1 AS MANAGING TRUSTEES FOR  
2 KOROGHLI MANAGEMENT TRUST,

3 Counter-defendants.

4 PATRICK CANET,

5 Cross-Claimant,

6 v.

7 JED MARGOLIN,

8 Cross-Defendant.

9 **STIPULATION TO CONTINUE HEARING ON STATUS OF THE CASE**

10 Plaintiffs/Counter-defendants Fred Sadri, both in his individual capacity and as Trustee  
11 for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and Ray Koroghli  
12 and Sathsowi T. Koroghli, in their individual capacities as well as Managing Trustees for  
13 Koroghli Management Trust, by and through counsel of record Richard F. Holley, Esq. Andrea  
14 M. Gandara, Esq. and Mary Langsner, Ph.D. of the law firm Holley Driggs Walch Fine Puzey  
15 Stein & Thompson (“Plaintiffs/Counter-defendants”); Jed Margolin, by and through his counsel  
16 of record Arthur A. Zorio, Esq. and Matthew D. Francis, Esq., of the law firm Brownstein Hyatt  
17 Farber Schreck, LLP (“Margolin”) (Plaintiffs/Counter-defendants and Margolin together, the  
18 “Parties”), hereby stipulate and agree as follows:

19 **RECITALS**

20 1. On May 19, 2019, Patrick Canet, Judicial Liquidator and Foreign Representative  
21 (“Canet”), filed Chapter 15 Petition for Recognition of Foreign Proceeding [ECF No. 1],<sup>1</sup> which  
22 commenced this bankruptcy Case.

23 2. On July 30, 2019, Margolin filed an Amended Motion to Dismiss the Case  
24 (“Motion”) [ECF No. 38]; hearing was set on October 1, 2019.

25  
26  
27 <sup>1</sup> All references to “ECF No.” are to the numbers assigned to the documents filed in the  
28 bankruptcy cases identified in the caption above (“Case”) as they appear on the docket  
maintained by the Clerk of the Court of the United States Bankruptcy Court for the District of  
Nevada.

1           3.     On September 17, 2019, Claimants filed a Limited Opposition to Amended  
2 Motion to Dismiss Chapter 15 Case [ECF No. 42].

3           4.     On September 19, 2019, Canet filed an Opposition to Motion to Dismiss  
4 [ECF No. 48].

5           5.     On October 1, 2019, the Court conducted its hearing on the Motion, at which the  
6 Parties appeared.

7           6.     On November 5, 2109 the Court entered an order that all proceedings in the main  
8 proceeding (Case No. 16-50644) and all Adversary proceedings including Case No. 17-05016,  
9 and the Complaint for Order Authorizing Sale of Real Property (ECF No. 57 filed in 16-50466)  
10 are hereby stayed pending resolution of the Motion to Dismiss Chapter 15 Case; and continued  
11 the hearing on the Motion to December 5, 2019 [ECF No. 62].

12           7.     On December 5, 2019, Margolin filed a Supplement to Amended Motion to  
13 Dismiss Chapter 15 Case [ECF No. 71].

14           8.     On December 19, 2019, Claimants filed a Response to Supplement to Amended  
15 Motion to Dismiss Chapter 15 Case [ECF No. 72].

16           9.     On December 26, 2019, Margolin filed a Reply to Response to Supplement to  
17 Amended Motion to Dismiss Chapter 15 Case [ECF No. 73].

18           10.    On January 2, 2020, the Court conducted hearing on matters before it, at which  
19 the Parties and counsel for Canet appeared. During the hearing, none of the Parties or Canet  
20 opposed the dismissal of the Chapter 15 case, but the Parties requested that the hearing be  
21 continued until January 10, 2020 so that they could discuss a mutually-agreeable resolution  
22 between them. As such, the Court continued the matter to January 10, 2020, at 10:00 a.m. [Adv.  
23 ECF No. 80].

24           11.    On January 10, 2020, the Parties stipulated and the Court entered an order  
25 approving the stipulation to continue the January 10, 2020 hearing to **January 17, 2020 at 2:00**  
26 **p.m.** [Adv. ECF No. 84].

27           12.    The Parties represent that they are still working towards a mutually agreeable  
28 resolution between them and request a short continuance in hopes of reaching an agreement.

1 NOW, THEREFORE, based upon the above Recitals, the Parties, by and through their  
2 counsel of record, hereby agree and stipulate as follows:

3 **STIPULATION**

4 **IT IS HEREBY STIPULATED AND AGREED** that the hearing on status of the  
5 above-captioned case is continued to **January 24, 2020, at 1:30 p.m.**, taking place in Courtroom  
6 No. 4, of the C. Clifton Young Federal Building & U.S. Courthouse, 300 Booth St, Reno, NV  
7 89509, and may be continued thereafter.

8 A proposed Stipulation to Continue Hearing on Status of the Case has been lodged  
9 contemporaneously herewith.

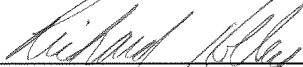
10 **IT IS SO STIPULATED.**

11 Dated this 17th day of January 2020.

Dated this 17th day of January 2020.

12 HOLLEY DRIGGS WALCH  
13 FINE PUZEY STEIN & THOMPSON

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP



/s/ Matthew D. Francis

14 Richard F. Holley, Esq. (NV Bar 3077)  
15 Andrea M. Gandara, Esq. (NV Bar 12580)  
16 Mary Langsner, Ph.D. (NV Bar 13707)  
17 400 South Fourth Street, Third Floor  
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20 *individual capacity and as Trustee for The*  
21 *Star Living Trust, dated April 14, 1997; Ray*  
22 *Koroghli, individually; and Ray Koroghli*  
23 *and Sathsowi T. Koroghli, in their*  
24 *individual capacities as well as Managing*  
25 *Trustees for Koroghli Management Trust*

Matthew D. Francis (Nevada Bar 6978)  
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5371 Kietzke Lane  
Reno, NV 89511  
*Attorneys for Jed Margolin*

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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 17th day of January 2020, I caused to be served a true and correct copy of STIPULATION TO CONTINUE HEARING ON MOTION TO DISMISS CASE 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 below, at their last known mailing addresses, on the date above written.

(OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced 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.

\_\_\_\_\_  
An employee of Holley Driggs Walch  
Fine Puzey Stein & Thompson

HOLLEY DRIGGS  
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