1 2 3 4 5 6 7 8 9	WRIGHT, FINLAY & ZAK, LLP Dana Jonathon Nitz, Esq. Nevada Bar No. 0050 Yanxiong Li, Esq. Nevada Bar No. 12807 7785 W. Sahara Ave., Suite 200 Las Vegas, Nevada 89117 (702) 475-7964; Fax: (702) 946-1345 yli@wrightlegal.net Attorneys for Plaintiffs/Counter-Defendants, Free Trustee for The Star Living Trust, dated April 14, in their individual capacities as well as Managing UNITED STATES BAR	1997; Ray Koroghli and Sathsowi T. Koroghli, g Trustees for Koroghli Management Trust NKRUPTCY COURT
9 10	DISTRICT O	
11	In re: JAZI GHOLAMREZA ZANDIAN,	Case No.: N-16-50644-btb
12	Debtor.	CHAPTER 15
13	FRED SADRI, AS TRUSTEE FOR THE STAR	Adv. No. 17-05016-btb
14	LIVING TRUST, DATED APRIL 14, 1997; RAY KOROGHLI AND SATHSOWI T.	
15	KOROGHLI, ASMANAGING TRUSTEES FOR KOROGHLI MANAGEMENT TRUST,	PLAINTIFF'S SECOND SUPPLEMENT
16		TO THEIR INITIAL DISCLOSURE OF WITNESSES AND DOCUMENTS
17	Plaintiffs,	
18	VS.	
19	JED MARGOLIN; JAZI GHOLAMREZA	
20	ZANDIAN; and all other parties claiming an interest in real properties described in this	
21	action,	
22	Defendants.	
23	PATRICK CANET,	
24 25	Counterclaimant,	
25 26	VS.	
20 27		
27	FRED SADRI INDIVIDUALLY AND IN HIS CAPACITY AS TRUSTEE OF THE STAR LIVING TRUSTAND RAY KOROGHLI	
	Page 1	of 8

1	INDIVIDUALLY, AND RAY KOROGHLI AND SATHSOWI T. KOROGHLI AS
2	MANAGING TRUSTEES OF THE
3	KOROGHLI MANAGEMENT TRUST,
4	Counter-Defendants.
5	PATRICK CANET,
6	Cross-Claimant,
7	V.
8	JED MARGOLIN,
9	Cross-Defendant.
10	
11	COMES NOW Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity
12	and as Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli, individually; and
13	Ray Koroghli and Sathsowi T. Koroghli, as Managing Trustees for Koroghli Management Trust
14	(hereinafter "Plaintiffs"), by and through their attorneys of record, Dana Jonathon Nitz, Esq. and
15	Yanxiong Li, Esq., of the law firm of Wright, Finlay & Zak, LLP hereby submits their SECOND
16	SUPPLEMENT to their initial disclosure of witnesses and documents: (New items appear in
17	BOLD):
18	A. INDIVIDUALS LIKELY TO HAVE INFORMATION DISCOVERABLE UNDER
19	Fed. R. Bankr. P. 7026 and Fed. R. Civ. P. 26(f).
20	1. Fred Sadri
21	c/o Yanxiong Li, Esq. WRIGHT FINLAY & ZAK, LLP
22	7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117
23	Tel: (702) 475-7964
24	Mr. Sadri. is expected to have knowledge concerning the facts and circumstances of this
25	case.
26	///
27	
28	///
	Page 2 of 8

1	2.	Ray Koroghli
2		c/o Yanxiong Li, Esq. WRIGHT FINLAY & ZAK, LLP
2		7785 W. Sahara Ave., Suite 200
4		Las Vegas, NV 89117 Tel: (702) 475-7964
5	М	r. Koroghli is expected to have knowledge concerning the facts and circumstances of
6	this case.	
7		
8	3.	Jed Margolin c/o Adam McMillen, Esq
9		BROWNSTEIN HYATT FARBER SCHRECK, LLP 5371 Kietzke Lane
10		Reno, NV 89511 Tel: (775) 324-4100
11	м	r. Margolin.is expected to have knowledge concerning the facts and circumstances of
12	this case.	T. Margonnins expected to have knowledge concerning the facts and circumstances of
13	uns case.	
14	4.	Patrick Canet, as Foreign Representative for Jazi Gholamreza Zandian c/o Jeffrey L. Hartman, Esq.
15		HARTMAN & HARTMAN 510 West Plumb Lane, Suite B
16		Reno, NV 89509
17		Tel: (775) 324-2800
18	case.	r. Canet is expected to have knowledge concerning the facts and circumstances of this
19		Jazi Gholamreza Zandian
20		6 Rue Edouard Fournier Paris, FR 75016
21		Tel: Unknown
22	М	r. Zandian is expected to have knowledge concerning the facts and circumstances of
23	this case.	
24	6.	Adam McMillen, Esq. c/o The Law Offices of Karl H. Smith
25		50 W. Liberty Street, Suite 303 Reno, NV 89501
26		Tel: (775) 329-2221
27	Μ	r. McMillen is expected to have knowledge concerning the facts and
28	circumst	ances of this case.
		Page 3 of 8

c/o 537 Rei	Brownstein Hyatt Farber Schreck /1 Kietzke Lane no, NV 89511	
	ndsley is expected to have knowledge concerning the facts	and circumstan
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		y withess(es) for
-	-	Rankr P 7076 au
DATE	DESCRIPTION	BATES N
08/06/2003	Grant, Bargain and Sale Deed	WFZ0001 -
		WFZ0007
08/06/2003	Grant, Bargain and Sale Deed	WFZ0008 -
		WFZ0013
10/05/2005	Complaint in Case No. 05A511131	WFZ0014 -
		WFZ0046
11/03/2005	Lis Pendens in Case No. 05A511131	WFZ0047 -
		WFZ0056
06/08/2007	Judgment Confirming Arbitration Award in Case No.	WFZ0057 -
	05A511131	WFZ0173
07/14/2008	Stipulated judgment in Case NO. 05A511131	WFZ0174 -
		WFZ0193
05/12/2009	Quitclaim Deed	WFZ0193 WFZ0194 -
	c/o 537 Rer Tel Ms. Lin f this case. Plaintif iscovery prog isclosures of reb DOCUME Fed. R. Civ. P DATE 08/06/2003 08/06/2003 10/05/2005	Plaintiffs reserve the right to amend, supplement, or add to this list of iscovery progresses. Plaintiffs reserve the right to call any witness listed in isclosures of individuals. Plaintiffs further reserve the right to call upon an ourposes of rebuttal/impeachment. DOCUMENTS WHICH ARE DISCOVERABLE UNDER Fed. R. F Yed. R. Civ. P. 26(f). Plaintiffs hereby identify and/or produce the following the following of grant, Bargain and Sale Deed 08/06/2003 Grant, Bargain and Sale Deed 10/05/2005 Complaint in Case No. 05A511131 06/08/2007 Judgment Confirming Arbitration Award in Case No.

08/19/2013	Default Judgment in Case No. 09 OC 00579 1B	WFZ0200
		WFZ0204
04/09/2015	Sheriff's Certificate of Sale (Parcel 8)	WFZ0205
		WFZ0206
09/08/2016	Sheriff's Deed Upon Sale (Parcel 8)	WFZ0207
		WFZ0208
04/09/2015	Sheriff's Certificate of Sale (Parcel 4)	WFZ0209
		WFZ0210
09/08/2016	Sheriff's Deed Upon Sale (Parcel 4)	WFZ0211
		WFZ0212
04/09/2015	Sheriff's Certificate of Sale (Parcel 2)	WFZ0213
		WFZ0214
09/08/2016	Sheriff's Deed Upon Sale (Parcel 2)	WFZ0215
		WFZ0216
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0217
	Parcel No. 079-150-09	WFZ0218
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0219
	Parcel No. 079-150-10	WFZ0220
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0221
	Parcel No. 079-150-13	WFZ0222
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0223
	Parcel No. 084-040-02	WFZ0224
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0225
	Parcel No. 084-040-04	WFZ0226
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0227
	Parcel No. 084-040-06	WFZ0228
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0229
	Parcel No. 084-040-10	WFZ0230

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12/26/2017	Washoe County Assessor's Historical Values for	WFZ0231 -
	Parcel No. 084-130-07	WFZ0232
12/26/2017	Washoe County Assessor's Historical Values for	WFZ0233 -
	Parcel No. 084-140-17	WFZ0234
08/01/2007	Pleadings from Supreme Court of Nevada Case No. 49924	WFZ0235 -
-		WFZ2256
08/19/2008		
12/11/2009	Pleadings from First Judicial District Court of Nevada –	WFZ2257 -
_	Carson City – Case No. 090C005791B	WFZ2439
06/03/2016		
06/16/2016	Jed Margolin's Objection to Petition for Recognition and	WFZ2490 -
	Chapter 15 Relief in U.S. Bankruptcy Court – District of	WFZ2553
	Nevada – Case No. BK-N-16-50644-BTB	
09/25/2017	Order on Stipulation for Final Resolution of Litigation (Doc #	WFZ2554 -
	4747575) recorded with the Washoe County Recorder	WFZ2576
07/20/2009	Stipulation for Final Resolution of Litigation (Doc #2009-	WFZ2577 -
	0720-0003600) recorded with the Clark County Recorder	WFZ2598
09/16/2013	Adam McMillen email to Fred Sadri re: Zandian	WFZ2599
	Judgment, transmittal of judgment and the attendant	WFZ2600
	documents.	
10/07/2013	Emails between Fred Sadri, Ray Koroghli and Adam	WFZ2601
	McMillen, re: Zandian, to coordinate a meeting	WFZ2602
10/11/2013	Ray Koroghli email to Adam McMillen regarding liened	WFZ2603
	properties	
07/30/2012	Payments made to Washoe County for Property Taxes	WFZ2604
		WFZ2609
-		
- 07/31/2017		

10/07/2013	Appointment book for week of October 7, 2013 – October 12, 2013	WFZ2610
10/07/2013	Appointment book entry for October 10, 2013 at 11:00 a.m.	WFZ2611
	showing appointment with Adam McMillen, Esq.	
Plainti	ffs reserve the right to amend, supplement, or add to this list of doc	uments any
other relevant	documents obtained through the discovery process or otherwise, w	ithout
limitation. Pla	intiffs reserve the right to use any document(s) listed in any other p	parties'
disclosures of	documents. Plaintiffs reserve the right to use any document(s) for	purposes of
rebuttal/impea	chment.	
B. COM	PUTATION OF DAMAGES	
Plainti	ffs' damages are equal to attorney's fees and costs incurred in this of	case. Plaintiffs
reserve the rig	ht to supplement this disclosure based on discovery/further investig	gation in this
action.		
C. INSU	RANCE AGREEMENTS	
Plainti	ffs are unaware of any relevant insurance agreements at this time.	
Plainti	ffs reserve the right to amend or to supplement these disclosures if	it appears at a
time that omis	sions or errors have been made or that additional or more accurate	information
becomes avail	able to Plaintiffs.	
DATED this 2	6th day of February, 2018.	
	WRIGHT, FINLAY & ZAK, LLP	
	<u>/s/ Yanxiong Li, Esq.</u> Dana Jonathon Nitz, Esq.	
	Nevada Bar No. 0050 Yanxiong Li, Esq.	
	Nevada Bar No. 12807 7785 W. Sahara Ave., Suite 200	
	Las Vegas, NV 89117 Tel: (702) 475-7964, Fax: (702) 946	
	Attorneys for Plaintiffs/Counter-Def Sadri, both in his individual capacit	y and as Truste
	for The Star Living Trust, dated Apr Koroghli and Sathsowi T. Koroghli, individual capacities as well as Man for Koroghli Management Trust	in their

1	CERTIFICATE OF SERVICE
2	I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP, and
3	that service of the foregoing PLAINTIFF'S SECOND SUPPLEMENT TO INITIAL
4	DISCLOSURES was made on this 26th day of February, 2018, through the CM/ECF Electronic
5	Filing system, via email to the email addresses below, and/or by depositing a true and correct
6	copy in the United States Mail, addressed as follows:
7	
8	Matthew D. Francis, Esq. Arthur A. Zorio, Esq.
9	BROWNSTEIN HYATT FARBER SCHRECK, LLP 5371 Kietzke Lane
10	Reno, NV 89511
11	mfrancis@bhfs.com azorio@bhfs.com
12	Attorney for Jed Margolin
13	Jeffrey L. Hartman, Esq.
14	HARTMAN & HARTMAN 510 West Plumb Lane, Suite B
15	Reno, NV 89509 jlh@bankruptcyreno.com
16	Attorney for Patrick Canet, Foreign Representativa
17	and Jazi Gholamreza Zandian
18	/s/ Kelli Wightman
19	An Employee of WRIGHT, FINLAY & ZAK, LLP
20	
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	Page 8 of 8

Fw: Zandian Judgment

Fred Sadri < fredsadri1@yahoo.com>

Mon 9/16/2013 2:43 PM

To:Ray Koroghli <koroghli@msn.com>;

5 attachments (7 MB)

2013-0627 Notice of Entry of Default Judgment.pdf; 2013-0417 Application for Default Judgment.pdf; 2013-0417 Dec of Jed Margolin in Support of App for Default Judgment.pdf; 2013-0417 Dec of APM in Support of App for Default Judgment.pdf; 2013-0624 Default Judgment.pdf;

Fred Sadri

----- Forwarded Message -----From: Adam McMillen <amcmillen@watsonrounds.com> To: "'fredsadri1@yahoo.com''' <fredsadri1@yahoo.com> Cc: Nancy Lindsley <NLindsley@watsonrounds.com> Sent: Monday, September 16, 2013 1:08 PM Subject: FW: Zandian Judgment

Fred:

Thank you for calling me and discussing the judgment against Zandian. Attached is the judgment and the attendant documents.

The judgment is for \$1,495,775.74 + \$17,641.96 (accrued interest) = \$1,513,417.70. Interest is accruing at \$215.15 per day.

As discussed, my client does not want to wait too long to begin executing on the judgment. The sooner you get back to me on this the better. However, please get back to me by no later than September 20, 2013 with a written proposal for purchasing the judgment. Of course, I am more than happy to answer any questions you may have regarding the judgment, so please email or call me with any questions.

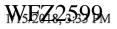
Sincerely,

Adam P. McMillen Attorney at Law

WATSON ROUNDS 5371 Kietzke Lane Reno, NV 89511

Telephone: (775) 324-4100 Facsimile: (775) 333-8171 amcmillen@watsonrounds.com

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under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

From: Adam McMillen Sent: Friday, August 23, 2013 4:46 PM To: 'fredsadri1@yahoo.com' Subject: Zandian Judgment

Fred:

Attached is the judgment and some associated documents. If you need more, we can provide you with more information. Just let me know.

Sincerely,

Adam P. McMillen Attorney at Law

WATSON ROUNDS

5371 Kietzke Lane Reno, NV 89511

Telephone: (775) 324-4100 Facsimile: (775) 333-8171 amcmillen@watsonrounds.com

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RE: Zandian

RAY KOROGHLI

Mon 10/7/2013 1:20 PM

Sent Items

To:Adam McMillen <amcmillen@watsonrounds.com>;

Cc:Fred Sadri <fredsadri1@yahoo.com>; susan babas <susanbabas@aol.com>;

Good afternoon Adam:

Would you please confirm the time and a place (your office address).

Thanks Ray K

From: amcmillen@watsonrounds.com To: koroghli@msn.com CC: fredsadri1@yahoo.com; susanbabas@aol.com Subject: RE: Zandian Date: Mon, 7 Oct 2013 19:35:54 +0000

Are you gentlemen still wanting to meet this Thursday? Let me know as soon as possible so I can plan accordingly.

Adam P. McMillen Attorney at Law

WATSON ROUNDS

5371 Kietzke Lane Reno, NV 89511

Telephone: (775) 324-4100 Facsimile: (775) 333-8171 amcmillen@watsonrounds.com

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From: RAY KOROGHLI [mailto:koroghli@msn.com] Sent: Monday, September 30, 2013 5:03 PM To: Adam McMillen Cc: Fred Sadri; susan babas Subject: Re: Zandian

Great

Thanks and have a great evening.

Ray K



Sent from my iPhone

On Sep 30, 2013, at 4:35 PM, "Adam McMillen" amcmillen@watsonrounds.com> wrote:

Let me get back to both of you on the meeting date/time. Thanks

Adam P. McMillen

Attorney at Law

WATSON ROUNDS 5371 Kietzke Lane Reno, NV 89511

Telephone: (775) 324-4100 Facsimile: (775) 333-8171 amcmillen@watsonrounds.com

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From: RAY KOROGHLI [mailto:koroghli@msn.com] Sent: Monday, September 30, 2013 3:32 PM To: Fred Sadri; Adam McMillen Cc: susan babas Subject: RE: Zandian

Good afternoon Gentlemen;

10 am would be great.

Thanks Ray K

Date: Mon, 30 Sep 2013 11:17:00 -0700 From: <u>fredsadri1@yahoo.com</u> Subject: Re: Zandian To: <u>amcmillen@watsonrounds.com</u> CC: <u>koroghli@msn.com</u> Please let u know what time would be good to meet you On October 10?

We rather 2 or 3 Pm.

Fred Sadri

From: Adam McMillen <a href="mailto:seam: seam: seam:

Adam P. McMillen

RE: Liened Properties

RAY KOROGHLI

Fri 10/11/2013 11:49 AM

Sent Items

To:Adam McMillen <amcmillen@watsonrounds.com>;

Cc:Fred Sadri <fredsadri1@yahoo.com>;

Thank you , it was great meeting you as well.

I would appreciated for sending the complete list that we can evaluate.

Have a great weekend.

Ray K

From: amcmillen@watsonrounds.com To: koroghli@msn.com CC: fredsadri1@yahoo.com Subject: Liened Properties Date: Fri, 11 Oct 2013 18:41:17 +0000

Ray,

It was good meeting with you and Fred yesterday. We are putting together a list of the properties that have been liened. However, there is a lien on all of the properties owned by Zandian, whether alone or with others, in the following Nevada counties.

Churchill Clark Elko Lyon Storey Washoe

Best,

Adam P. McMillen Attorney at Law

WATSON ROUNDS 5371 Kietzke Lane Reno, NV 89511

Telephone: (775) 324-4100 Facsimile: (775) 333-8171 amcmillen@watsonrounds.com

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