

1 (“Zandian”) with Margolin’s First Set of Interrogatories to Zandian as well as Margolin’s First  
2 Set of Requests for Production to Margolin. A true and correct copy of Margolin’s First Set of  
3 Interrogatories to Zandian is attached hereto as Exhibit 1, and a true and correct copy of  
4 Margolin’s First Set of Requests for Production to Zandian is attached hereto as Exhibit 2.  
5 Pursuant to NRC 33 and 34, responses to these discovery requests, as well as responsive  
6 documents, were due on August 20, 2012. No responses or documents were served on that date  
7 or thereafter.

8 4. Also on July 16, 2012, Margolin served Zandian with Margolin’s First Set of  
9 Requests for Admissions. A true and correct copy of the First Set of Requests for Admissions is  
10 attached hereto as Exhibit 3. Pursuant to NRC 36, responses to these Requests for Admissions  
11 were due on August 20, 2012. No responses were served on that date or thereafter.

12 5. On September 10, 2012, Margolin emailed and faxed Zandian a meet and confer  
13 letter demanding that Zandian serve responses and documents to the aforementioned discovery  
14 (and other discovery) no later than September 17, 2012. A true and correct copy of this letter is  
15 attached hereto as Exhibit 4. In the September 10, 2012 letter, Margolin demanded that Zandian  
16 “respond, without objection, to the requests for admissions, the requests to produce documents  
17 (including the actual production of documents), and the interrogatories no later than September  
18 17, 2012.” Exhibit 4. Margolin stated that if Zandian failed to comply with this request,  
19 Margolin would file a motion to compel with this Court. *Id.* Margolin also stated that since  
20 Margolin did not respond to Margolin’s First Set of Requests for Admissions, those admissions  
21 were (and are) deemed admitted. *Id.* Zandian has not served responses or documents pursuant to  
22 the aforementioned discovery requests, nor has he responded to the September 10, 2012 letter.

23 *Id.*

24 6. I certify that I have in good faith corresponded with Zandian in an effort to  
25 resolve this discovery dispute without court intervention. However, my sincere efforts to resolve  
26 the dispute have been unsuccessful.

27 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
28 knowledge.