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*Attorneys for Plaintiff Jed Margolin*  
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7 **In The First Judicial District Court of the State of Nevada**  
8 **In and for Carson City**  
9

10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

13 **OPTIMA TECHNOLOGY CORPORATION,**  
14 **a California corporation, OPTIMA**  
**TECHNOLOGY CORPORATION, a Nevada**  
15 **corporation, REZA ZANDIAN**  
16 **aka GOLAMREZA ZANDIANJAZI**  
**aka GHOLAM REZA ZANDIAN**  
17 **aka REZA JAZI aka J. REZA JAZI**  
**aka G. REZA JAZI aka GHONONREZA**  
18 **ZANDIAN JAZI, an individual, DOE**  
**Companies 1-10, DOE Corporations 11-20,**  
19 **and DOE Individuals 21-30,**

20 **Defendants.**  
21

**Case No.: 090C00579 1B**

**Dept. No.: 1**

**PLAINTIFF'S FIRST SET OF**  
**REQUESTS FOR PRODUCTION OF**  
**DOCUMENTS TO REZA ZANDIAN**

22 Plaintiff Jed Margolin ("Margolin") Pursuant to Rules 26 and 34 of the Nevada Rules  
23 of Civil Procedure, hereby requests that Defendant Reza Zandian aka Golamreza Zandianjazi,  
24 aka Gholam Reza Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza  
25 Zandian Jazi ("Zandian") serve responses and documents to the following Requests for  
26 Production within thirty (30) days of service hereof. These Requests are considered  
27 continuing and therefore Zandian is required to supplement his responses and document  
28

1 production whenever Zandian obtains different or additional knowledge, information or belief  
2 relative to the Requests.

3 **I. DEFINITIONS AND GUIDELINES**

4 Margolin incorporates by reference the Definitions and Guidelines set forth in  
5 Margolin's First Set of Interrogatories to Reza Zandian.

6 **II. DOCUMENT REQUESTS**

7 **REQUEST NO. 1:**

8 Any and all documents identified in and/or supporting your responses to Plaintiff's first  
9 set of interrogatories served upon you.

10 **REQUEST NO. 2:**

11 Please provide a complete copy of any and all documents, correspondence,  
12 memoranda, electronic email and attachments containing or referring to communications  
13 between yourself and NASA.

14 **REQUEST NO. 3:**

15 Please provide a complete copy of any and all documents, correspondence,  
16 memoranda, electronic email communications between yourself and the law firm of Greenberg  
17 Traurig LLP including the following Greenberg Traurig LLP members:

18 Scott J. Bornstein

19 Allan A. Kassenoff

20 E. Jeffrey Walsh

21 Paul J. Sutton

22 **REQUEST NO. 4:**

23 Please provide a complete copy of any and all documents, correspondence,  
24 memoranda, electronic email and attachments containing or referring to communications  
25 between yourself and the law firm of John Peter Lee Ltd (Las Vegas) including, but not  
26 limited to, the following John Peter Lee Ltd members:

27 John Peter Lee

28 John C. Courtney

1 Paul C. Ray

2 **REQUEST NO. 5:**

3 Please provide a complete copy of any and all documents, correspondence,  
4 memoranda, electronic email and attachments containing or referring to communications  
5 between yourself and the law firm of Chandler Udall Law Firm LLP, Udall Law Firm LLP,  
6 Udall Law IP LLP (all in Arizona) including but not limited to the following:

7 Edward Moomjian II

8 Jeanna Chandler Nash

9 Ryan Redmon

10 **REQUEST NO. 6:**

11 Please provide a complete copy of any and all documents, correspondence,  
12 memoranda, electronic email and attachments containing or referring to communications  
13 between yourself and the United States Patent Office (“PTO”) regarding the December 5, 2007  
14 assignment of patents you filed with the PTO relating to patent numbers 5,566,073, 5,904,724,  
15 6,377,436 and 5,978,488 (the “patents”).

16 **REQUEST NO. 7:**

17 Please provide a complete copy of any and all documents, correspondence,  
18 memoranda, electronic email and attachments containing or referring to communications  
19 between you and any other person or entity relating to the patents.

20 **REQUEST NO. 8:**

21 Please provide a complete copy of any and all documents, correspondence,  
22 memoranda, electronic email and attachments containing or referring to communications  
23 between you and any other person or entity relating to the licensing of the patents.

24 **REQUEST NO. 9:**

25 Please provide a complete copy of any and all documents related to all revenues  
26 derived from your activities related to the patents after filing the assignment of the patents on  
27 December 5, 2007.

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**AFFIRMATION PURSUANT TO NRS 239B.030**

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED: July 16, 2012

WATSON ROUNDS

BY: /s/ Adam McMillen  
Matthew D. Francis (6978)  
Adam P. McMillen (10678)  
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Reno, NV 89511  
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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Plaintiff's First Set of Requests for Production of Documents Interrogatories to Reza Zandian**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd.  
San Diego, CA 92122

Dated: July 16, 2012

15/  
Carla Ousby