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6  
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**  
17 **aka GHOLAM REZA ZANDIAN**  
18 **aka REZA JAZI aka J. REZA JAZI**  
19 **aka G. REZA JAZI aka GHONONREZA**  
**ZANDIAN JAZI, an individual, DOE**  
**Companies 1-10, DOE Corporations 11-20,**  
**and DOE Individuals 21-30,**

20 **Defendants.**

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

**Dept. No.: 1**

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

21  
22 Pursuant to NRCPC 26 and NRCPC 36, Plaintiff Jed Margolin ("Margolin") hereby  
23 requests that Defendant Reza Zandian aka Golamreza Zandianjazi, aka Gholam Reza Zandian  
24 aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi ("Zandian")  
25 serve responses to the following Requests for Admission within thirty (30) days of service  
26 hereof. These Requests are considered continuing and therefore Zandian is required to  
27 supplement his responses whenever Zandian obtains different or additional knowledge,  
28 information or belief relative to the Requests for Admissions.

1 **I. DEFINITIONS**

2 A. As used in these Interrogatories, unless otherwise specified, the terms "Zandian,"  
3 "you," or "your" refers to Reza Zandian aka Golamreza Zandianjazi, aka Gholam Reza  
4 Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi and any  
5 other aka.

6 B. As used in these Requests, the terms "document," "documents," or "documentation"  
7 refer to any and all tangible items or sources of information within the meaning of Rule 34 of  
8 the Nevada Rules of Civil Procedure, whether original or non-identical copies of such items, in  
9 both final and draft form, of every kind and nature whatsoever, that are within your  
10 possession, custody or control, or that are known by you to exist. The terms "document" or  
11 "documents" include, but are not limited to, all correspondence, memoranda, records, notes,  
12 drafts, proposals, minutes of meetings, books, papers, drawings, telegrams, logs, diaries,  
13 computer printouts, computations, ledgers, journals, purchase orders, bills of lading, invoices,  
14 vouchers, checks, books of original entry and other books or records; all studies, analyses, or  
15 other valuative or interpretive reports; recordings or memoranda of conversations, or any other  
16 written, printed, typewritten or other graphic or photographic matter or tangible thing on which  
17 any information is affixed; all mechanical, electronic, sound or video recordings or transcripts  
18 thereof; all other magnetic recordings or matter existing in any other machine readable form;  
19 and all information capable of being retrieved from a computer.

20 C. As used in these Requests, the terms "communicate" or "communications" refer to  
21 all conversations, messages, correspondence, or contacts between any persons, whether in  
22 person, in writing, by telephone, or by any other means.

23 D. As used in these Requests, the terms "person" or "persons" refer to all individuals,  
24 associations, partnerships, corporations, and any other business entities.

25 **II. GUIDELINES**

26 1. Each matter is admitted unless, within 30 days after service of this request,  
27 Zandian serves a written answer or objection addressed to the matter.  
28



1 Admit that you falsely represented to the United States Patent Office that “Jed  
2 Margolin based on a Power of Attorney dated July 20, 2004 to: Optima Technology  
3 Corporation (CA)” was conveying its rights to the patents to Optima Technology Corporation  
4 (NV). See Exhibit A.

5 **REQUEST FOR ADMISSION NO. 3:**

6 Admit that you knew when you submitted the assignment of the patents on December  
7 5, 2007 that you did not have the power or the authority to assign the patents to Optima  
8 Technology Corporation (NV) and therefore you knew your representation to the United States  
9 Patent Office was false.

10 **REQUEST FOR ADMISSION NO. 4:**

11 Admit that when you filed the assignment for the patents on December 5, 2007 that  
12 you intended to fraudulently induce the United States Patent Office to record the assignment of  
13 the patents.

14 **REQUEST FOR ADMISSION NO. 5:**

15 Admit that by fraudulently signing and filing the assignment of the patents with the  
16 United States Patent Office on December 5, 2007, you wrongfully exerted dominion over the  
17 patents and thereby knowingly deprived Jed Margolin of his rights and use of the patents.

18 **REQUEST FOR ADMISSION NO. 6:**

19 Admit that you knew you were unjustified in signing and filing the assignment of the  
20 patents with the United States Patent Office on December 5, 2007.

21 **REQUEST FOR ADMISSION NO. 7:**

22 Admit that you knew that by filing the December 5, 2007 patents’ assignment with the  
23 United States Patent Office that you would interfere with Jed Margolin’s patent rights,  
24 including the royalties due to him under the patents.

25 **REQUEST FOR ADMISSION NO. 8:**

26 Admit that at the time you signed and filed the assignment of patents with the United  
27 States Patent Office on December 5, 2007, you knew Jed Margolin had a valid contract with  
28

1 Optima Technology Group where Optima Technology Group promised to pay Jed Margolin  
2 patent royalties to Jed Margolin based on the license of the 5,566,073 and 5,904,724 patents.

3 **REQUEST FOR ADMISSION NO. 9:**

4 Admit intentionally filed the assignment of the patents on December 5, 2007 with the  
5 United States Patent Office with the intent and design to disrupt and interfere with the  
6 contractual relationship that Jed Margolin had with Optima Technology Group.

7 **REQUEST FOR ADMISSION NO. 10:**

8 Admit that you were aware of Jed Margolin's prospective business relations with  
9 licensees of the patents.

10 **REQUEST FOR ADMISSION NO. 11:**

11 Admit that you purposely, willfully and improperly attempted to induce Jed Margolin's  
12 prospective licensees to refrain from engaging in business with Jed Margolin.

13 **REQUEST FOR ADMISSION NO. 12:**

14 Admit that on and after December 5, 2007 you purposely, willfully and improperly  
15 induced Jed Margolin's prospective licensees to refrain from engaging in business with Jed  
16 Margolin.

17 **REQUEST FOR ADMISSION NO. 13:**

18 Admit that on December 5, 2007 you wrongfully obtained record title to the patents,  
19 without any justification.

20 **REQUEST FOR ADMISSION NO. 14:**

21 Admit that on December 5, 2007 you knew and were aware that record title to the  
22 patents was valuable and that there were benefits to be derived from having record title.

23 **REQUEST FOR ADMISSION NO. 15:**

24 Admit that you unjustly benefitted from the use of the patents, which were the property  
25 of Jed Margolin, and you did not compensate Jed Margolin for such wrongful use.

26 **REQUEST FOR ADMISSION NO. 16:**

27 Admit that by filing the December 5, 2007 assignment of the patents that you  
28 knowingly and intentionally interfered with the business relationships of Jed Margolin without

1 any consent or authority from Jed Margolin.

2 **REQUEST FOR ADMISSION NO. 17:**

3 Admit that you intentionally interfered with and disrupted Jed Margolin's contract with  
4 Optima Technology Group.

5 **REQUEST FOR ADMISSION NO. 18:**

6 Admit that you knowingly and intentionally made false representations to the United  
7 States Patent Office regarding the assignment of the patents on December 5, 2007 and  
8 therefore you knowingly and willfully committed unfair and deceptive trade practices under  
9 NRS 598.0915 et seq.

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

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

13  
14 DATED: July 16, 2012

WATSON ROUNDS

15 BY: /s/ Adam McMillen

16 Matthew D. Francis (6978)  
17 Adam P. McMillen (10678)  
18 5371 Kietzke Lane  
19 Reno, NV 89511  
20 Telephone: 775-324-4100  
21 Facsimile: 775-333-8171  
22 *Attorneys for Plaintiff Jed Margolin*  
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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 Admissions to Reza Zandian**, addressed as follows:

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

Dated: July 16, 2012

CS/  
Carla Ousby

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