Matthew D. Francis (6978) Cassandra P. Joseph (9845) 2 WATSON ROUNDS 5371 Kietzke Lane 3 Reno, NV 89511 Telephone: 775-324-4100 Facsimile: 775-333-8171 4 Attorneys for Plaintiff Jed Margolin 5 6 7 8 9 10 JED MARGOLIN, an individual, Plaintiff. 11 12 VS. 13 OPTIMA TECHNOLOGY CORPORATION. a California corporation, OPTIMA 14 TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka 15 GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA 16

JAZI aka G. REZA JAZI aka GHONONREZA

1-10, DOE Corporations 11-20, and DOE

Defendants.

Individuals 21-30,

ZANDIAN JAZI, an individual, DOE Companies

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In The First Judicial District Court of the State of Nevada In and for Carson City

Case No.: 090C00579 1B

Dept. No.: 1

DECLARATION OF CASSANDRA P. JOSEPH IN SUPPORT OF APPLICATION FOR DEFAULT **JUDGMENT**

I, Cassandra P. Joseph do hereby declare and state as follows:

- 1. I am a partner at the law firm of Watson Rounds located at 5371 Kietzke Lane. Reno, Nevada 89511. This declaration is based upon my personal knowledge, and is made in support of Plaintiff's Application for Default Judgment.
- 2. The Complaint in this action was filed on December 11, 2009, and was personally served upon Defendant Reza Zandian ("Zandian") on February 2, 2010 and on Defendants Optima Technology Corporation, a Nevada corporation, and Optima Technology Corporation, a California corporation on March 21, 2010. True and correct copies of the

Affidavits of Service are attached hereto as Exhibit A.

- 3. Answers to the Complaint were due on February 22, 2010 and March 8, 2010, but Defendants have not answered the Complaint or responded in any way.
- 4. Default was entered against Defendants on December 2, 2010. Plaintiff filed and served a Notice of Entry of Default for each defendant on December 7, 2010. Plaintiff served the Application for Default and the Notice of Entry of Default for each defendant on Defendants' last known attorney on December 16, 2010. A true and correct copy of each Notice of Entry of Default is attached hereto as Exhibit B.
- 5. To date, Plaintiff has incurred billed and unbilled costs in the amount of \$2,327.46. A true and correct copy of a printout from the Watson Rounds Alsco client ledger is attached hereto as Exhibit C. As a result, the total amount of costs incurred in this action to date total \$2,327.46.
- 6. Attached hereto as Exhibit D is a true and correct printout from http://www.moneycafe.com/library/primerate.htm showing the prime interest rates from 2001-2011. The prime interest rate as of June 1, 2007 was 8.25%.
- 7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 28th day of February, 2011.

CASSANDRA P. JØSEPH