1	Affidavits of Service are attached hereto as Exhibit A.
2	3. Answers to the Complaint were due on February 22, 2010 and March 8, 2010,
3	but Defendants have not answered the Complaint or responded in any way.
4	4. Default was entered against Defendants on December 2, 2010. Plaintiff filed
5	and served a Notice of Entry of Default for each defendant on December 7, 2010. Plaintiff
6	served the Application for Default and the Notice of Entry of Default for each defendant on
7	Defendants' last known attorney on December 16, 2010. A true and correct copy of each
8	Notice of Entry of Default is attached hereto as Exhibit B.
9	5. To date, Plaintiff has incurred billed and unbilled costs in the amount of
10	\$2,327.46. A true and correct copy of a printout from the Watson Rounds Alsco client ledger
11	is attached hereto as Exhibit C. As a result, the total amount of costs incurred in this action to
12	date total \$2,327.46.
13	6. Attached hereto as Exhibit D is a true and correct printout from
14	http://www.moneycafe.com/library/primerate.htm showing the prime interest rates from 2001-
15	2011. The prime interest rate as of June 1, 2007 was 8.25%.
16	7. I declare under penalty of perjury that the foregoing is true and correct to the
17	best of my knowledge.
18	
19	Dated this 28 th day of February, 2011. By:
20	CASSANDRA P. JØSEPH
21	
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1	Matthew D. Francis (6978) Adam P. McMillen (10678)	REC'D & FILED	
2	WATSON ROUNDS 5371 Kietzke Lane	2011 AUG 1 1 PM 4: 05	
3	Reno, NV 89511 Telephone: 775-324-4100	ÁLAN GLOVER	
4	Facsimile: 775-333-8171 Attorneys for Plaintiff Jed Margolin		
5		BYCLERK	
6			
7	In The First Judicial District Co	urt of the State of Nevada	
8	In and for Car	son City	
9			
10	JED MARGOLIN, an individual,		
11	Plaintiff,	Case No.: 090C00579 1B	
12	VS.	Dept. No.: 1	
13	OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA		
14	TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN	<u>MOTION TO SERVE BY</u> <u>PUBLICATION</u>	
15	aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN		
16	aka REZA JAZI aka J. REZA JAZI		
17	aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI, an individual, DOE		
18 19	Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,		
20	Defendants.		
20			
22	COMES NOW Plaintiff Jed Margolin and h	ereby files this motion to serve Defendants	
23	Reza Zandian, Optima Technology Corporation, a California Corporation, and Optima		
24	Technology Corporation, a Nevada Corporation (collectively "Zandian"), pursuant to NRCP		
25	4(e)(1)(i) via publication.		
26	This motion is based on the following Memorandum of Points and Authorities, the		
27	Declaration of Adam P. McMille, Esq., the attached	l exhibits, and all pleadings, motions, and	
28	papers on file herein.		
	1		
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3	MEMORANDUM OF POINTS AND AUTHORITIES
4	I.
5	STATEMENT OF FACTS
6	On December 11, 2009, Plaintiff Jed Margolin filed his Complaint against Defendants
7	Reza Zandian, Optima Technology Corporation, a California Corporation, and Optima
8	Technology Corporation, a Nevada Corporation. All three Summonses were originally issued
9	on December 15, 2009 and March 9, 2010. See Summons regarding Defendants Reza
10	Zandian, Optima Technology Corporation, a California Corporation, and Optima Technology
11	Corporation, a Nevada Corporation, attached hereto as Exhibits 2, 3, and 4. Thereafter,
12	Plaintiff attempted to serve Defendants at their last-known residential and/or business address
13	of 8401 Bonita Downs Road, Fair Oaks, California 95628. Id. The process servers were
14	unable to personally serve Defendants and were unable to locate alternate addresses for
15	Defendants. Id.
16	As Plaintiff was having difficulty serving Defendants, the summons and complaint
17	were mailed to Defendants' attorney, John Peter Lee, on January 8, 2010, and a request for
18	assistance in serving Defendants was made. See Letter, dated 1/08/10, from Cassandra Joseph
19	to John Peter Lee, attached hereto as Exhibit 5. Despite the fact that Mr. Lee represented
20	Reza Zandian prior to this action, Mr. Lee never responded to Cassandra Joseph's request for
21	assistance in serving the Defendants. See Declaration of Adam P. McMillen, Esq., attached
22	hereto as Exhibit 1.
23	Eventually, a notice of entry of default judgment against the Defendants was filed on
24	March 7, 2011. On June 9, 2011, Defendant Reza Zandian, filed a motion to dismiss. On
25	August 3, 2011, this Court set aside the default judgment, denied the motion to dismiss and
26	ordered that Plaintiff shall have 90 days from August 3, 2011 to properly effectuate service on
27	the Defendant.
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1	On August 4, 2011, Adam McMillen sent a letter to John Peter Lee requesting that Mr.	
2	Lee accept service on behalf of his client, Reza Zandian. See Letter, dated 8/04/11, from	
3	Adam McMillen to John Peter Lee, attached hereto as Exhibit 6. Mr. McMillen also	
4	requested that Mr. Lee provide a current address for Reza Zandian. Id.	
5	On August 8, 2011, Mr. Lee sent Mr. McMillen a letter stating as follows:	
6	We cannot accept service, nor can we give you Reza Zandian's current address.	
7	Except to indicate that he does not reside in Nevada at the present time and is not subject to the jurisdiction of the courts of this State within the provisions of	
8	the litigation commenced by your firm involving an Arizona judgment which cannot be domesticated in Nevada.	
9	See Letter, dated 8/8/11, from John Peter Lee to Adam McMillen, attached hereto as Exhibit 7	
10	(emphasis added).	
11	II.	
12	LEGAL AUTHORITY	
13	NRCP 4(e) states in pertinent part as follows:	
14		
15	 (1) Service by Publication. (i) General. In addition to methods of personal service, when the person on 	
16	whom service is to be made resides out of the state, or has departed from the state, or cannot, after due diligence, be found within the state, or by	
17	concealment seeks to avoid the service of summons, and the fact shall appear, by Declaration, to the satisfaction of the court or judge thereof, and it shall	
18	appear, either by Declaration or by a verified complaint on file, that a cause of action exists against the defendant in respect to whom the service is to be made,	
19	and that the defendant is a necessary or proper party to the action, such court or judge may grant an order that the service be made by the publication of	
20	summons.	
21	Provided, when said Declaration is based on the fact that the party on whom	
22	service is to be made resides out of the state, and the present address of the party is unknown, it shall be a sufficient showing of such fact if the affiant shall	
23	state generally in such Declaration that at a previous time such person resided out of this state in a certain place (naming the place and stating the latest date	
24	known to affiant when such party so resided there); that such place is the last	
25	place in which such party resided to the knowledge of affiant; that such party no longer resides at such place; that affiant does not know the present place of	
26	residence of such party or where such party can be found; and that affiant does not know and has never been informed and has no reason to believe that such	
27		
~ ~	party now resides in this state; and, in such case, it shall be presumed that such party still resides and remains out of the state, and such Declaration shall be	
28	party now resides in this state; and, in such case, it shall be presumed that such party still resides and remains out of the state, and such Declaration shall be	

deemed to be a sufficient showing of due diligence to find the defendant. This 1 rule shall apply to all manner of civil actions, including those for divorce. 2 (iii) Publication. The order shall direct the publication to be made in a newspaper, published in the State of Nevada, to be designated by the court or 3 judge thereof, for a period of 4 weeks, and at least once a week during said time. In addition to in-state publication, where the present residence of the 4 defendant is unknown the order may also direct that publication be made in 5 a newspaper published outside the State of Nevada whenever the court is of the opinion that such publication is necessary to give notice that is reasonably 6 calculated to give a defendant actual notice of the proceedings. In case of publication, where the residence of a nonresident or absent defendant is known, 7 the court or judge shall also direct a copy of the summons and complaint to be deposited in the post office, directed to the person to be served at the person's 8 place of residence. The service of summons shall be deemed complete in cases 9 of publication at the expiration of 4 weeks from the first publication, and in cases when a deposit of a copy of the summons and complaint in the post office 10 is also required, at the expiration of 4 weeks from such deposit. 11 NRCP 4(e)(1)(i) and (iii)(emphasis added). 12 In the case at bar, the Declaration of Adam P. McMillen, Esq., attached hereto as 13 **Exhibit 1**, and the Complaint on file herein show that a cause of action exists in favor of 14 Plaintiff and against Defendants and that Defendants, each of them, are necessary and proper 15 parties to this action. Moreover, Defendant Reza Zandian no longer resides at his last known 16 address or is intentionally evading service. 17 Likewise, the above facts and attached Summonses and Declaration of Adam P. 18 McMillen, Esq. unequivocally demonstrate that due diligence was exercised by Plaintiff and 19 Plaintiff's process servers in an attempt to personally serve the Defendants at their last known 20 address. In addition, Defendant Reza Zandian's lawyer will not accept service, will not 21 provide a current address, and states that Reza Zandian does not reside in Nevada. As a result, 22 Plaintiff now seeks service by publication because Plaintiff does not know Defendants' present 23 place of residence or employment. 24 III. 25 **CONCLUSION** 26 Based upon the foregoing, Plaintiff respectfully requests that this Court grant this 27 motion to effectuate service of process by publication and that such service of process be 28

1	AFFIRMATION PURSUANT TO NRS 239B.030
2	The undersigned does hereby affirm that the preceding document does not contain the
3	social security number of any person.
4	Dated this 11 th day of August, 2011.
5	
6	BY: Matthew D. Francis (6978)
7	Matthew D. Francis (6978) Adam P. McMillen (10678) WATSON ROUNDS
8	5371 Kietzke Lane Reno, NV 89511
9	Reno, NV 89511 Telephone: 775-324-4100 Facsimile: 775-333-8171
10	Attorneys for Plaintiff Jed Margolin
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1	CERTIFICATE OF SERVICE				
2	Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on				
3	this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true				
4	and correct copy of the foregoing document, MOTION TO SERVE BY PUBLICATION,				
5	addressed as follows:				
6	John Peter Lee				
7	John Peter Lee, Ltd. 830 Las Vegas Blvd. South Las Vegas, NV 89101				
9					
10	Dated: August 11, 2011 Carla Ousby				
11					
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	INDEX OF EXHIBITS	
Exhibit No.	Title	Number of Pag
1	Affidavit of Adam P. McMillen	3
2	Returned Summons to Reza Zandian	4
3	Returned Summons to Optima technology Corporation, a California corporation	4
4	Returned Summons to Optima technology Corporation, a California corporation Returned Summons to Optima technology Corporation, a Nevada corporation	4
5	January 8, 2010, Letter to John Peter Lee	15
6	August 4, 2011, Letter to John Peter Lee	1
7	August 8, 2011, Letter from John Peter Lee	1
8	Summonses	6

Exhibit 1

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Exhibit 1

	((
1	Matthew D. Francis (6978)		
2	Adam P. McMillen (10678) WATSON ROUNDS		
3	5371 Kietzke Lane Reno, NV 89511		
4	Telephone: 775-324-4100 Facsimile: 775-333-8171		
5	Attorneys for Plaintiff Jed Margolin		
6			
7	In The First Judicial District Co	urt of the State of Nevada	
8	In and for Car		
9			
10	JED MARGOLIN, an individual,		
11	Plaintiff,	Case No.: 090C00579 1B	
12	vs.	Dept. No.: 1	
13	OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA	DECLARATION OF ADAM P.	
14	TECHNOLOGY CORPORATION, a Nevada	MCMILLEN IN SUPPORT OF	
15	corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka	MOTION TO SERVE BY PUBLICATION	
16	GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka		
17	GHONONREZA ZANDIAN JAZI, an individual, DOE Companies		
18	1-10, DOE Corporations 11-20, and DOE Individuals 21-30,		
19			
20	Defendants.		
21	I, Adam P. McMillen do hereby declare and	state as follows:	
22		Vatson Rounds located at 5371 Kietzke	
23			
24	Lane, Reno, Nevada 89511. I represent the Plaintiff, Jed Margolin, in the above referenced cause of action against the named Defendants, who are necessary parties to this action. This		
25 26	declaration is based upon my personal knowledge, a		
26 27	to Serve by Publication.		
27		ed on December 11, 2009, and personal	
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service was attempted upon Defendant Reza Zandian ("Zandian") at his last known address at
 8401 Bonita Downs Road, Fair Oaks, California 95628 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 2, 3, and 4.

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3. As we were having difficulty serving Defendant Reza Zandian, the summons and complaint were mailed to Defendants' attorney, John Peter Lee, on January 8, 2010, and a request for assistance in serving Defendants was made. *See* a true and correct copy of the Letter, dated 1/8/10, from Cassandra Joseph to John Peter Lee, attached hereto as **Exhibit 5**.

4. On August 4, 2011, I sent a letter to John Peter Lee requesting that Mr. Lee
 accept service on behalf of his client, Reza Zandian, and that he provide a current address for
 Mr. Lee. *See* a true and correct copy of the Letter, dated 8/4/11, from Adam McMillen to John
 Peter Lee, attached hereto as Exhibit 6.

Service on behalf of Reza Zandian and that he could not give us Zandian's current address.
 See a true and correct copy of the Letter, dated 8/8/11, from John Peter Lee to Adam
 McMillen, attached hereto as Exhibit 7.

According to the affidavits attached to the filed summonses, the last known
 address of Reza Zandian was 8401 Bonita Downs Road, Fair Oaks, California 95628.
 Apparently Reza Zandian does not live at this address, as manifested by his recent motion to
 dismiss.

7. Affiant does not know the present address of Reza Zandian, or where he resides
or where he may be found; and that after due diligence, Reza Zandian cannot be found within
the State of Nevada or if he was last known to reside outside of the State of Nevada, that
Affiant does not know where he resides, where he may be found and that Affiant has no
knowledge, has never been informed, and has no reason to believe that Reza Zandian currently
resides in the State of Nevada.

28

Based upon the fact that process servers cannot personally serve Reza Zandian 8. and that his lawyer, John Peter Lee, will not accept service and will not provide a current address for his client, therefore, Affiant believes that Reza Zandian cannot be found at this time. 9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Dated this 11th day of August, 2011. By: ADAM P. MCMILLEN

Exhibit 2

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Exhibit 2

No.	090000579	1B

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REC'D & FILED 2010 MAR -9 PM 2: 15 ALAH GLOVER +HARKLEROAD

SUMMONS

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

JED MARGOLIN, an individual Plaintiff.

Optima Technology Corporation, a Galifornia corporation, Optima Technology Corporation, a Nevada corporation, Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. RezaDefendant, Jazi aka G. Reza Jazi aka Chononreza Zandian Jazi, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30 DEFENDANTS

THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANT:

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you.

1. If you wish to defend this lawsuit, you must, within 20 days after this Summons is served on you, exclusive of the day of service, file with this Court a written pleading in response to this Complaint.

2. Unless you respond, your default will be entered upon application of the plaintiff, and this Court may enter a judgment against you for the relief demanded in the Complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.
 You are required to serve your response upon plaintiffs attorney, whose address is

•	ALAN GLOVER	
· · · ·	Clerk of Cour	Ē
	By	
15	Deputy Clerk	-
Date, 20, 20, 20, 20,		

*Note - When service by publication, insert a brief statement of the object of the action. See Rule 4.

RETURN OF SERVICE ON REVERSE SIDE

AFFIDAVIT OF SERVI	CE
TATE OF <u>CALIFORNIA</u> (For General Use)	
OUNTY OF SACRAMENTO SS.	.
ROBERT TOTH , declares under penalty of per	lurv:
hat affiant is, and was on the day when he served the within Summons, over 18 years of age, and not a party to, nor intered, the within action; that the affiant received the Summons on the 22^{NO} day of $TANUARY$, 20 I and personally served the same upon $Reza ZANDIAN$ are within named defendant, on the 2^{NO} day of $FeBIeVARY$, 20 I , by delivering to the said defenders on ally, in $FAIROARS$, county of $SACIRAMENTO$, State of $CALIFORN$ copy of the Summons attached to a copy of the Complaint.	(0) Idant, レノタ
TATE OF NEVADA NEVADA SHERIFF'S RETUI	
ARSON CITY	ity)
nereby certify and return that I received the within Summons on theday of, 20, 20 nd personally served the same upon, 20, by delivering to the said defendant, personally, in Carson C	ant,
h the	ity,
	,
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne	,
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne ale:, 20 By TATE OF NEVADA SS. AFFIDAVIT OF MAILING (For Use When Service is by Publication and Mail	epuly
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne ale:, 20, 20	eputy ling
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne ate;, 20 By TATE OF NEVADA OUNTY OF, SS, SS, declares under penalty of penat affiant is, and was when the herein described malling took place, over 18 years of age, and not a party to, nor intere- the within action; that on the, day of, 20, affaint deposited in the Post Office	epuly rjury estec
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne	aputy aputy //ng/ /rjury astac ice a alope
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne ale;, 20 By TATE OF NEVADA OUNTY OF SS. AFFIDAVIT OF MAILING (For Use When Service is by Publication and Mail OUNTY OF, declares under penalty of pe hat affiant is, and was when the herein described mailing took place, over 18 years of age, and not a party to, nor intere , the within action; that on the day of, 20, affaint deposited in the Post Offi, Nevada, a copy of the within Summons attached to a copy of the Complaint, enclosed in a sealed envel to much first class postage was fully prepaid, addressed to	aputy aputy rjury ice a alope
tale of Nevada, a copy of the Summons attached to a copy of the Complaint. Sheriff of Carson City, Ne ate:, 20 By TATE OF NEVADA OUNTY OF SS. AFFIDAVIT OF MAILING (For Use When Service is by Publication and Mail OUNTY OF, declares under penalty of pe hat affiant is, and was when the herein described mailing took place, over 18 years of age, and not a party to, nor intere , the within action; that on the day of, 20, affaint deposited in the Post Offi, Nevada, a copy of the within Summons attached to a copy of the Complaint, enclosed in a sealed enve	aputy aputy rjury ice a alope

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If service is made in any manner permitted by Rule 4 other than personally upon the defendant, or is made outside the United States, a special affidavit or return must be made

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1 2	Jed Margolin v. Optima Technology Corp., et al. Case No. 090C00579 1B Declaration of Robert Toth	
3	I, ROBERT TOTH, hereby declare:	
4	I am a registered process server for the State of California. I have personal knowledge of	
5	the facts contained in this Declaration, and if called as a witness, I could and would competently	
6	testify thereto. As to those matters alleged on information and belief, I believe them to be true.	.
7	I served copies of the Summons and Complaint, on Reza Zandian aka Golamreza	
8	Zandianjaza, aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka	
9	Ghonomeza Zanian Jazi:	
10	On January 26, 2010 at 8:43 a.m., I wen to the residence address at 8401 Bonita Downs	
11	Road, Fair Oaks, California 95628. There was no answer at the door.	
12	On January 28, 2010 at 3:47 p.m., I returned to the residence again, and there was no	
13	answer at the door.	
14	On January 31, 2010 at 4:13 p.m., I went the residence address, and again there was no	
15	answer at the door.	
16	On February 2, 2010 at 5:37 p.m., when I returned to the residence address, I observed no	ł
17	lights on, no cars parked, but that the trash was set out.	
18	On February 2, 2010 at 7:21 p.m., I returned to the residence address. The door was	
19	answered by an elderly man, described as mid to late-60's, middle eastern accent, 5'4" tall, grey	
20	hair, long beard, thin, and wearing glasses. I told him I was looking for Reza. I showed him the	
21	name on the documents with the various names, and made a motion that he knew one or more of	
22	the names. I showed him the photograph that I had. I told him I had legal documents for Reza,	
23	and that I would leave it with him. He took the envelope, opened it and saw the documents. He	
24	told me that he did not want the papers and that he did not live there. I told him that we had	
25	confirmed that was his address. He returned the envelope back. I told him that he needed to	
26	make sure that Reza got the paperwork. I put the envelope by the doorway. He picked up the	
27	envelope and threw it at me as I was leaving. I left the documents there and again told him that	
28	he had been served for Reza.	
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed this 18th day of February, at Citrus Heights, California.

-2-

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ROBERT M. TOTH Registered Process Server

Exhibit 3

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Exhibit 3



090C00579 1B No.

1 Dept. .

2010 MAR 26 PM 1:40 ALAN GLOVER

SUMMONS

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

JED MARGOLIN, an individual

Plaintiff,

VS. Optima Technology Corporation, a California corporation, OPtima Technohogy Corporation, a Nevada corporation, Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. RezDefendant. / Jazi aka G. Reza Jazi aka Chononreza Zandian Jazi, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30.

THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANT: Optima TEchnology Corporation, a California Corporation NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you.

1. If you wish to defend this lawsuit, you must, within 20 days after this Summons is served on you, exclusive of the day of service, file with this Court a written pleading in response to this Complaint.

2. Unless you respond, your default will be entered upon application of the plaintiff, and this Court may enter a ludgment against you for the relief demanded in the Complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiff's attorney, whose address is

to a second second	ALAN GLOVER	
Bv	Munding	Clerk of Court
		Deputy Clerk

March 9 20 10 Date.

*Note - When service by publication, insert a brief statement of the object of the action. See Rule 4.

RETURN OF SERVICE ON REVERSE SIDE

STATE OF CALIFORNIA	AFFIDAVIT OF SERVICE (For General Use)
COUNTY OF <u>SACRAMENTO</u> SS. I SHAWN SARDIA	, declares under penally of perjury:
In, the within action; that the affiant received the Summons of and personally served the same upon $\underline{\mathcal{RCZA} \ \mathcal{RANN}}$ the within named defendant, on the $\underline{\mathcal{RI}^{ST}}$ day of $\underline{\mathcal{RANN}}$ personally, in $\underline{\mathcal{RAIL} \ \mathcal{OAKS}}$, County a copy of the Summons attached to a copy of the Complaint I declare under penalty of perjury under the law of the State	a Summons, over 18 years of age, and not a party to, nor Interested on the $\frac{9^{1r} 20^{-TL-S}}{A}$ day of \underline{MARCH} , 20 <u>10</u> , <u>AN</u> , <u>AGENT FOR SERVICE OF PROCESS</u> <u>MARCH</u> , 20 <u>10</u> , by delivering to the said defendant, of <u>SACRAMENTO</u> , State of <u>CACIFORNIA</u> ,
STATE OF NEVADA CARSON CITY	NEVADA SHERIFF'S RETURN (For Use of Sheriff of Carson City)
and personally served the same upon	
Dale:, 20	Sheriff of Carson City, Nevada By Deputy
STATE OF NEVADA	AFFIDAVIT OF MAILING (For Use When Service is by Publication and Mailing)
That affiant is, and was when the herein described malling in, the within action; that on the day of , Nevada, a copy of the within Summon	g took place, over 18 years of age, and not a party to, nor interested , 20, affaint deposited in the Post Office at as attached to a copy of the Complaint, enclosed in a sealed envelope
Executed this day of	

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NOTE - If service is made in any manner permitted by Rule 4 other than personally upon the defendant, or is made outside the United es, a special affidavit or return must be made

.

Jed Margolin v. Optima Technology Corporation, et al. Case No. 090C0500679 1B Declaration of Robert Toth			
I, ROBERT TOTH, hereby declare:			
I am a registered process server for the State of California. I have personal knowledge of			
the facts contained in this Declaration, and if called as a witness, I could and would competently			
testify thereto. As to those matters alleged on information and belief, I believe them to be true.			
I attempted service of copies of the Summons, Complaint and Order on Reza Zandian,			
agent for process of service for Optima Technoloy Corp, a California Corp and Optima			
Technology Corp, A Nevada Corp., as follows:			
On March 19, 2010 at 4:12 p.m., I went to the residence address at 8401 Bonita Downs			
Road Fair Oaks, 95628. There was no answer at the door.			
On March 20, 2010 at 12:07 p.m. There was no answer at the door.			
At that time, I turned over the documents to an associated, Shawn Sardia.			
I declare under penalty of perjury under the laws of the State of California that the			
foregoing is true and correct, and that this declaration is executed this 23 rd day of March, at			
Citrus Heights, California.			
Robert M loth			
Registered Process Server Sacramento #2000-28			
Sacramento #2000-28			
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Jed Margolin v. Optima Technology Corporation, et al. Case No. 090C0500679 1B Declaration of Shawn Sardia

I, SHAWN SARDIA, hereby declare:

I am a registered process server for the State of California. I have personal knowledge of
the facts contained in this Declaration, and if called as a witness, I could and would competently
testify thereto. As to those matters alleged on information and belief, I believe them to be true.

I served copies of the Summons, Complaint and Order on Reza Zandian, agent for
process of service for Optima Technoloy Corp, a California Corp and Optima Technology Corp,
A Nevada Corp., as follows:

On March 20, 2010 at 10:14 a.m., I went to the residence located at 8401 Bonita Downs
Road, Fair Oaks, CA 95628. There was no answer at the door.

On March 21, 2010 at 9:45 a.m. I returned to the residence. There was no answer at the door.

On March 21, 2010 at 6:45 p.m. I returned to the resident's address. The door was answered by an elderly man, described as mid to late-60's, middle eastern accent, 5'4" tall, grey hair, long beard, thin, wearing glasses and is the subject's father. I told him I had legal documents for Reza Zandian, and that I would leave it with him. He told me he did not want the papers. I put the envelope by the doorway and told him he had been served for Reza. He closed the door.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct, and that this declaration is executed this 23rd day of March, at
Citrus Heights, California.

Registered Process Server Sacramento #2008-5

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Exhibit 4

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Exhibit 4

No. 090C00579 1B

Dept. ____1

REC'D&FILEU 2010 MAR 26 PM 1:40 ALAN GLOVER BY____

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

JED MARGOLIN, an individual

SUMMONS

Plaintiff,

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VS,

Optima Technology Corporation, a California corporation, OPtima Technölogy Corporation, a Nevada corporation, Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. RezDefendant, Jazi aka G. Reza Jazi aka Chononreza Zandian Jazi, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30.

> THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANT: Optima Technology Corporation, a Nevada Corporation

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you.

1. If you wish to defend this lawsuit, you must, within 20 days after this Summons is served on you, exclusive of the day of service, file with this Court a written pleading in response to this Complaint.

2. Unless you respond, your default will be entered upon application of the plaintiff, and this Court may enter a judgment against you for the relief demanded in the Complaint', which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiff's attorney, whose address is

			ALAN GLOVER	
				Clerk of Court
		,	By Mareldina	
			.,	Deputy Clerk
Date	March 9 20 10			

*Note - When service by publication, insert a brief statement of the object of the action. See Rule 4,

RETURN OF SERVICE ON REVERSE SIDE

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I SHAWN		, 		leclares under ne	nally of periury
the within action; that the and personally served the same within named defendant, evolution in <u>FAIROAKS</u> copy of the Summons attacted clare under penalty of personally in <u>S3^{KI}</u>	ne upon <u>PCEA ZAND</u> on the <u>PLEF</u> day <u>5</u> , Co shed to a copy of the Comp arjury under the law of the B	DIAN <u>AGOVT FOR</u> of <u>MARCH</u> Dunty of <u>SACRAM</u> plaint. State of Nevada that	2 <u>5001/02 06</u> , , 20 <u>.70</u> , b k/v70, f	ALL CESS y delivering to the State of <u>CAL</u> rue and correct.	sald defendant, I <u>F OR # 14</u>
TATE OF NEVADA	SS.			SHERIFF'S f Sheriff of C	
ARSON CITY					
ARSON CITY	ame upon, 2	20 , by delivering) lo the said defer	, the within nai	ned defendant, in Carson City,
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ARSON CITY	ame upon, 2 rof, 2 he Summons attached to a	20 , by delivering) lo the said defer	, the within nai	ned defendant,
ARSON CITY hereby certify and return the nd personally served the san the day tate of Nevada, a copy of the san the day tate of Nevada, a copy of the san the day tate of Nevada, a copy of the san tate of Nevada, a copy of	ame upon, 2 rof, 2 he Summons attached to a	20, by delivering a copy of the Compla By	lo the said defer int. AFFIDAVI	, the within nai	ned defendant, in Carson City, son City, Nevada Deputy NG
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ARSON CITY hereby certify and return the nd personally served the sa n the day state of Nevada, a copy of t Date: Date: STATE OF NEVADA COUNTY OF That affiant is, and was when n, the within action; that or	ame upon, 2 of, 2 he Summons attached to a , 20 ss. Ss. nen the herein described m n the day	20, by delivering a copy of the Compla By By (For Use nailing look place, ov	AFFIDAVI When Service er 18 years of ag	, the within name and ant, personally, Sheriff of Car Sheriff of Car T OF MAILI is by Publication declares under e, and not a party faint deposited in	ned defendant, in Carson City, son City, Nevada Deputy NG on and Mailing penalty of perjury to, nor interested the Post Office a
ARSON CITY hereby certify and return th nd personally served the sa n the day tate of Nevada, a copy of t Date: Date: STATE OF NEVADA COUNTY OF That affiant is, and was wh n, the within action; that or, Nevad upon which first class posta	ame upon, 2 he Summons attached to a , 20 hen the herein described m hen the herein described m day a, a copy of the within Sun ge was fully prepaid, addr	20, by delivering a copy of the Compla By	AFFIDAVI When Service ar 18 years of ag 	T OF MAILI is by Publication declares under e, and not a party faint deposited in plaint, enclosed in	ned defendant, in Carson City, son City, Nevada Deputy NG on and Mailing penalty of perjury to, nor interested the Post Office a a sealed envelop
CARSON CITY hereby certify and return the and personally served the sate on the day State of Nevada, a copy of the Date: STATE OF NEVADA COUNTY OF That affiant is, and was whe in, the within action; that or	ame upon, 2 he Summons attached to a , 20 , 20 hen the herein described m in the day a, a copy of the within Sum ge was fully prepaid, addr t, at nunication by mail between	20, by delivering a copy of the Compla By	AFFIDAVI When Service er 18 years of ag 	T OF MAILI is by Publication , declares under e, and not a party faint deposited in plaint, enclosed in addressed.	ned defendant, in Carson City, son City, Nevada Deputy NG on and Mailing penalty of perjury to, nor interested the Post Office a a sealed envelop

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If service is made in any manner permitted by Rule 4 other than perponally upon the defendant, or is made outside the United tes, a special affidavit or return must be made

	·. ·
1 2	Jed Margolin v. Optima Technology Corporation, et al. Case No. 090C0500679 1B Declaration of Robert Toth
3	I, ROBERT TOTH, hereby declare:
4	I am a registered process server for the State of California. I have personal knowledge of
5	the facts contained in this Declaration, and if called as a witness, I could and would competently
6	testify thereto. As to those matters alleged on information and belief, I believe them to be true.
7	I attempted service of copies of the Summons, Complaint and Order on Reza Zandian,
8	agent for process of service for Optima Technoloy Corp, a California Corp and Optima
9	Technology Corp, A Nevada Corp., as follows:
10	On March 19, 2010 at 4:12 p.m., I went to the residence address at 8401 Bonita Downs
11	Road Fair Oaks, 95628. There was no answer at the door.
12	On March 20, 2010 at 12:07 p.m. There was no answer at the door.
13	On March 19, 2010 I turned over a copy of the documents to an associate, Shawn Sardia.
14	I declare under penalty of perjury under the laws of the State of California that the
15	foregoing is true and correct, and that this declaration is executed this 23 rd day of March, at
16	Citrus Heights, California.
17	Rolt / lot
18	ROBERT M. TOTH Registered Process Server
19	Sacramento #2000-28
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Jed Margolin v. Optima Technology Corporation, et al. Case No. 090C0500679 1B Declaration of Shawn Sardia

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I, SHAWN SARDIA, hereby declare:

I am a registered process server for the State of California. I have personal knowledge of the facts contained in this Declaration, and if called as a witness, I could and would competently 5 testify thereto. As to those matters alleged on information and belief, I believe them to be true. б

7 I served copies of the Summons, Complaint and Order on Reza Zandian, agent for 8 process of service for Optima Technoloy Corp, a California Corp and Optima Technology Corp, 9 A Nevada Corp., as follows:

On March 20, 2010 at 10:14 a.m., I went to the residence located at 8401 Bonita Downs 10 Road, Fair Oaks, CA 95628. There was no answer at the door. 11

On March 21, 2010 at 9:45 a.m. I returned to the residence. There was no answer at the door.

On March 21, 2010 at 6:45 p.m. I returned to the resident's address. The door was 14 15 answered by an elderly man, described as mid to late-60's, middle eastern accent, 5'4" tall, grey hair, long beard, thin, wearing glasses and is the subject's father. I told him I had legal documents 16 17 for Reza Zandian, and that I would leave it with him. He told me he did not want the papers. I put the envelope by the doorway and told him he had been served for Reza. He closed the door. 18

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed this 23rd day of March, at 20 Citrus Heights, California. 21

Registered Process Server Sacramento #2008-5

Exhibit 5

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Exhibit 5



January 8, 2010

KELLY (I, WATSON ¹ MICHAEL D, ROUNDS ¹ MATTHEW D, FRANCIS ²

ARTHUR A, ZORIO¹ CASSANDRA P, JOSEPH¹ MELISSA P, BARNARD RYAN E, JOHNSON TARA A, SHIROFF MATTHEW G, HOLLAND ADAM P, MeMILLEN² ELIZA BECHTOLD⁴ ADAM YOWELL

OF COUNSEL-MARC D. FOODMAN ^{1,3}

¹ Also licensed in California
 ² Also licensed in Utah
 ³ Also licensed in Massaulusetts
 ⁴ Licensed only in California

5371 Kietzko Lane Reno, Novada 89511 (775) 324-4100 Fax (775) 333-8171 e-mail: reno@voltsourounds.com

777 North Rainbow Boulevard Suite 350 Las Vegas, Nevada 89107 (702) 636-4902 Fax (702) 636-4904

One Market-Steurnt Tower Suite 1600 San Francisco, CA 94105 (415)243-4090 Fnx (415)243-0226

www.watsonrounds.com

Reply to: Reno

John Peter Lee, Esq. John Peter Lee, Ltd. 830 Las Vegas Boulevard South Las Vegas, NV 89101

Re: Optima Technology Corporation and Reza Zandian

Dear Mr. Lee:

We represent Mr. Jed Margolin in a case pending in the First Judicial District Court for the State of Nevada in and for Carson City, Case No. 09 0C 00579 1B captioned Jed Margolin v. Optima Technology Corporation (CA), Optima Technology Corporation (NV), Reza Zandian aka Golamreza Zandianjazi aka aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka Ghonomreza Zandian Jazi (the Action). Copies of the summonses and complaint filed in the Action are enclosed.

We understand that at one time you represented one or more of the Defendants named in the Action. We are attempting to effectuate service of the enclosed summonses and complaint on Mr. Zandian and the Defendant entities and have been unsuccessful thus far. Please inform me whether you currently represent Mr. Zandian or the Defendant entities, and if so, whether you will accept service on behalf of any of the Defendants. If you refuse or cannot accept service on behalf of any of the Defendants, please provide any information possible regarding the whereabouts of any of the Defendants. Alternatively, please provide copies of the summonses and complaint to the Defendants.

Please inform me by January 29, 2010 whether or not you will accept service of the summonses and complaint on behalf of any of the Defendants, or whether you



John Peter Lee, Esq. January 8, 2010 Page 2

will take any other action requested herein. I look forward to hearing from you.

Sincerely,

Cassandra P. Joseph WATSON ROUNDS A Professional Corporation

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1	CASE No.: D9 DC 00579 1B REC'D & FILED
2	Dant Na. T
3	2009 DEC 11 PM 4+ 07
4	REV开 GLOVER BYCLERK
5	DEPUT Y
6	IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
7	IN AND FOR CARSON CITY
8	JED MARGOLIN, an individual,
10	Plaintiff,
11	VS,
12	OPTIMA TECHNOLOGY
13	CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION,
14	a Nevada corporation, REZA ZANDIAN aka
15	GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA
16	JAZI aka J. REZA JAZI aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI,
17	an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals
18	21-30,
19	Defendants.
20	
21	<u>COMPLAINT</u> (Exemption From Arbitration Requested)
22	Plaintiff, JED MARGOLIN ("Mr. Margolin"), by and through his counsel of record,
23	WATSON ROUNDS, and for his Complaint against Defendants, hereby alleges and complains
24	as follows:
25	
26	<u>The Parties</u>
27	1. Plaintiff Mr. Margolin is an individual residing in Storey County, Nevada.
28	2. On information and belief, Defendant Optima Technology Corporation is a
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California corporation with its principal place of business in Irvine, California. 1 3. On information and belief, Defendant Optima Technology Corporation is a 2 3 Nevada corporation with its principal place of business in Las Vegas, Nevada. 4 4. On information and belief, Defendant Reza Zandian, aka Golamreza Zandianjazi, 5 aka Golamreza Zandianjazi, aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. 6 Reza Jazi, aka Ghononreza Zandian Jazi (collectively "Zandian"), is an individual who at all 7 relevant times resided in San Diego, California or Las Vegas, Nevada, 8 On information and belief, Defendant Optima Technology Corporation, the 5. 9 Nevada corporation ("OTC-Nevada") is a wholly owned subsidiary of Optima Technology 10 Corporation, the California corporation ("OTC---California"), and Defendant Zandian at all 11 12 relevant times served as officers of the OTC—California and OTC—Nevada, 13 6. Mr. Margolin believes, and therefore alleges, that at all times herein mentioned, 14 each of the Defendants was the agent, servant or employee of each of the other Defendant and at 15 all times was acting within the course and scope of said agency and/or employment and that each 16 Defendant is liable to Mr. Margolin for the reasons and the facts herein alleged. Relief is sought 17 herein against each and all of the Defendants jointly and severally, as well as its or their agents, 18 assistants, successors, employees and all persons acting in concert or cooperation with them or at 19 20 their direction. Mr. Margolin will amend his Complaint when such additional persons acting in 21 concert or cooperation are ascertained.

Jurisdiction and Venue

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7. Pursuant to the Nevada Constitution, Article 6, Section 6, the district courts of the
State of Nevada have original jurisdiction in all cases excluded by law from the original
jurisdiction of the justice courts. This case involves tort claims in an amount in excess of the
jurisdictional limitation of the justice courts and, accordingly, jurisdiction is proper in the district
court.

-2-

8, 1 Venue is based upon the provisions of N.R.S. § 13.010, et seq., inasmuch as the 2 Defendants at all times herein mentioned has been and/or is residing or currently doing business 3 in and/or are responsible for the actions complained of herein in Storey County. Facts 4 9. Plaintiff Mr. Margolin is the named inventor on numerous patents and patent 5 applications, including United States Patent No. 5,566,073 ("the '073 Patent"), United States 6 7 Patent No. 5,904,724 ("the '724 Patent"), United States Patent No. 5,978,488 ("the '488 Patent") 8 and United States Patent No. 6,377,436 ("the '436 Patent") (collectively "the Patents"). 9 10. Mr. Margolin is the legal owner and owner of record for the '488 and '436 10 Patents, and has never assigned those patents. 11 11. In July 2004, Mr. Margolin granted to Optima Technology Group ("OTG"), a 12 Cayman Islands Corporation specializing in aerospace technology, a Power of Attorney 13 regarding the '073 and '724 Patents. In exchange for the Power of Attorney, OTG agreed to pay 14 15 Mr. Margolin royalties based on OTG's licensing of the '073 and '724 Patents. 16 12. In May 2006, OTG and Mr. Margolin licensed the '073 and '724 Patents to 17 Geneva Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty 18 agreement between Mr. Margolin and OTG. 19 13. On about July 20, 2004, Mr. Margolin assigned the '073 and '724 Patents to 20 OTG. 21 14. In about November 2007, OTG licensed the '073 Patent to Honeywell 22 23 International, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty 24 agreement between Mr. Margolin and OTG. 25 15. In December 2007, Defendant Zandian filed with the U.S. Patent and Trademark 26 Office ("USPTO") fraudulent assignment documents allegedly assigning all four of the Patents 27 to Optima Technology Corporation. 28

-3.

Upon discovery of the fraudulent filing, Mr. Margolin: (a) filed a report with the
 Storey County Sheriff's Department; (b) took action to regain record title to the '488 and '436
 Patents that he legally owned; and (c) assisted OTG in regaining record title of the '073 and '724
 Patents that it legally owned and upon which it contracted with Mr. Margolin for royalties.

In the Arizona Action, Mr. Margolin and OTG were named as defendants in an action
for declaratory relief regarding non-infringement of the '073 and '724 Patents in the United
States District Court for the District of Arizona, in a case titled: Universal Avionics Systems *Corporation v. Optima Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the "Arizona
Action"). In the Arizona Action, Mr. Margolin and OTG filed a cross-claim for declaratory
relief against Zandian in order to obtain legal title to their respective patents.

12 18. On August 18, 2008, the United States District Court for the District of Arizona
entered a final judgment in favor of Mr. Margolin and OTG on their declaratory relief action, and
ordered that OTC had no interest in the '073 or '724 Patents, and that the assignment documents
filed with the USPTO were "forged, invalid, void, of no force and effect." Attached as Exhibit A
is a copy of the Order from the United States District Court in the Arizona Action.

18 19. Due to Defendants' fraudulent acts, title to the Patents was clouded and interfered
19 with Plaintiff's and OTG's ability to license the Patents.

20 20. During the period of time Mr. Margolin worked to correct record title of the
 21 Patents in the Arizona Action and with the USPTO, he incurred significant litigation and other
 22 costs associated with those efforts.

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Claim 1--Conversion (Against All Defendants)

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21. Paragraphs 1-20 of the Complaint set forth above are incorporated herein by
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22. Through the fraudulent acts described above, Defendants wrongfully exerted
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dominion over the Patents, thereby depriving Mr. Margolin of the use of such property.

-4-

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1	23.	The Patents and the royalties due Mr. Margolin under the Patents were the
2	personal prop	perty of Mr. Margolin.
3	24.	As a direct and proximate result of the Defendants' conversion, Mr. Margolin has
4	suffered dam	ages in excess of ten thousand dollars (\$10,000), entitling him to the relief set forth
5	below.	
6		Claim 2Tortious Interference With Contract
7		(Against All Defendants)
8		
9	25.	Paragraphs 1-24 of the Complaint set forth above are incorporated herein by
10	reference.	
11	26.	Mr. Margolin was a party to a valid contract with OTG for the payment of
12		ed on the license of the '073 and '724 Patents.
13	27.	Defendants were aware of Mr. Margolin's contract with OTG.
14	28.	Defendants committed intentional acts intended and designed to disrupt and
15	interfere with	n the contractual relationship between Mr. Margolin and OTG.
16	29.	As a result of the acts of Defendants, Mr. Margolin's contract with OTG was
17	actually inter	fered with and disrupted.
18	30.	As a direct and proximate result of the Defendants' tortious interference with
19	contract, Mr.	Margolin has suffered damages in excess of ten thousand dollars (\$10,000),
20	entitling him	to the relief set forth below.
21	Cla	im 3-Intentional Interference with Prospective Economic Advantage
22		(Against All Defendants)
23	31.	Paragraphs 1-30 of the Complaint set forth above are incorporated herein by
24	reference.	
25	32.	Defendants were aware of Mr. Margolin's prospective business relations with
26	licensees of t	
27	33.	Defendants purposely, willfully and improperly attempted to induce Mr.
28	Margolin's p	rospective licensees to refrain from engaging in business with Mr. Margolin.
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1 34. The foregoing actions by Defendants interfered with the business relationships of 2 Mr. Margolin, and were done intentionally and occurred without consent or authority of Mr. 3 Margolin. 4 35, As a direct and proximate result of the Defendants' tortious interference, Mr. 5 Margolin has suffered damages in excess of ten thousand dollars (\$10,000), entitling him to the б relief set forth below. 7 Claim 4-Unjust Enrichment (Against All Defendants) 8 9 36. Paragraphs 1-35 of the Complaint set forth above are incorporated herein by 10 reference. 11 37. Defendants wrongfully obtained record title to the Patents. 12 38. Defendants were aware that record title to the Patents was valuable, and were 13 aware of the benefit derived from having record title. 14 39, Defendants unjustly benefitted from the use of Mr. Margolin's property without 15 compensation to Mr. Margolin, 16 40. As a direct and proximate result of Defendants' aforementioned acts, Mr. 17 Margolin is entitled to equitable relief. 18 Claim 5-Unfair and Deceptive Trade Practices 19 (Against All Defendants) 2041. Paragraphs 1-40 of the Complaint set forth above are incorporated herein by 21 reference. 22 42. The Defendants, engaging in the acts and conduct described above, have 23 knowingly and willfully committed unfair and deceptive trace practices under NRS 598.0915 by 24 making false representations. 25 43. As a direct and proximate result of the Defendants' unfair and deceptive trade 26 practices, Mr. Margolin has suffered damages in excess of ten thousand dollars (\$10,000), 27 entitling him to the relief set forth below. 28

-6-

1 2 3 4 5 6	WH follows: 1. 2. 3.	EREFORE, Plaintiff Jed Margolin, prays for judgment against the Defendants as That Plaintiff be awarded damages for Defendants' tortious conduct; That Plaintiff be awarded damages for Defendants' unjust enrichment; That Plaintiff be awarded damages for Defendants' commission of unfair and
7 8		ade practices, in an amount to be proven at trial, with said damages being trebled
9		NRS 598.0999;
10	4.	That Plaintiff be awarded actual, consequential, future, and punitive damages of
11	whatever ty	pe or nature;
12	-5,	That the Court award all such further relief that it deems just and proper.
13		AFFIRMATION
14	Purs	suant to NRS 239B.030, the undersigned does hereby affirm that the preceding
15	document, f	filed in District Court, does not contain the social security number of any person.
16		
17 18	DATED: 1	December <u>10</u> , 2009 WATSON ROUNDS
18		$\partial / \dot{\partial} / \partial$
20		anning 100g
21		Matthew D. Francis (6978) Cassandra P. Joseph (9845)
22		WATSON ROUNDS 5371 Kietzke Lane
23		Reno, NV 89511 Telephone: 775-324-4100
24		Facsimile: 775-333-8171
25		Attorneys for Plaintiff Jed Margolin
26		
27		
28		
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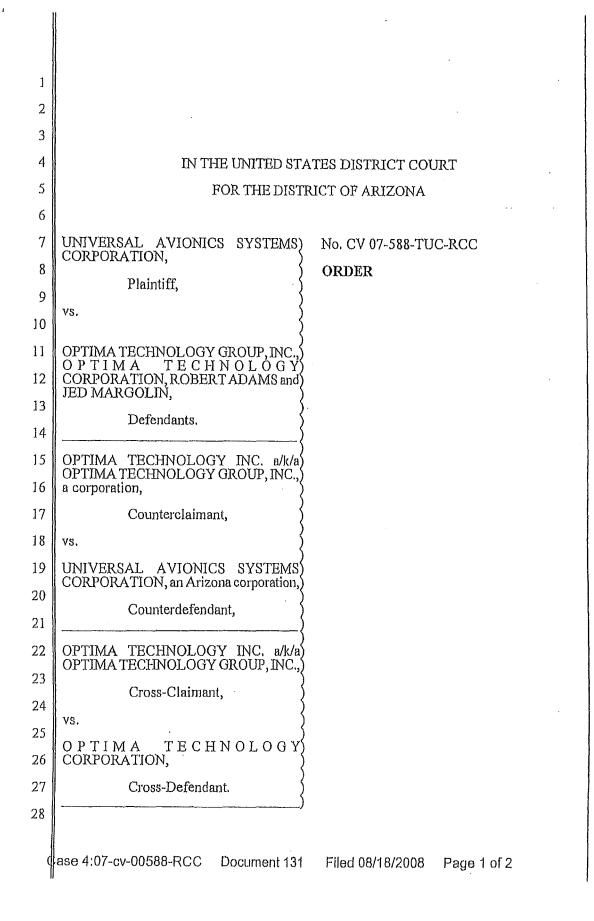
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Exhibit 1

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Exhibit 1



This Court, having considered the Defendants' Application for Entry of Default
 Judgment against Cross-Defendant Optima Technology Corporation, finds no just reason to
 delay entry of final judgment.

Therefore, IT IS HEREBY ORDERED:

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Final Judgment is entered against Cross-Defendants Optima Technology Corporation,
a California corporation, and Optima Technology Corporation, a Nevada corporation, as
follows:

8 1. Optima Technology Corporation has no interest in U.S. Patents Nos. 5,566,073 and
9 5,904,724 ("the Patents") or the Durable Power of Attorney from Jed Margolin dated July
10 20, 2004 ("the Power of Attorney");

2. The Assignment Optima Technology Corporation filed with the USPTO is forged,
 invalid, void, of no force and effect, and is hereby struck from the records of the USPTO;

3. The USPTO is to correct its records with respect to any claim by Optima
Technology Corporation to the Patents and/or the Power of Attorney; and

4. OTC is hereby enjoined from asserting further rights or interests in the Patentsand/or Power of Attorney; and

17 5. There is no just reason to delay entry of final judgment as to Optima Technology
18 Corporation under Federal Rule of Civil Procedure 54(b).

Document 131

19 DATED this 18th day of August, 2008.

ase 4:07-cv-00588-RCC

Raner C. Collins United States District Judge

Filed 08/18/2008

Page 2 of 2

ORIGINAL

090C00579 1B No.

Dept. ____I

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

SUMMONS

JED MARGOLIN, an individual Plaintiff.

Optima Technology Corporation, a Galifornia corporation, Optima Technology Corporation, a Nevada corporation, Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. RezaDefendant, Jazi aka G. Reza Jazi aka Chononreza Zandian Jazi, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30 DEFENDANTS

THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANT:

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you.

1. If you wish to defend this lawsult, you must, within 20 days after this Summons is served on you, exclusive of the day of service, file with this Court a written pleading in response to this Complaint.

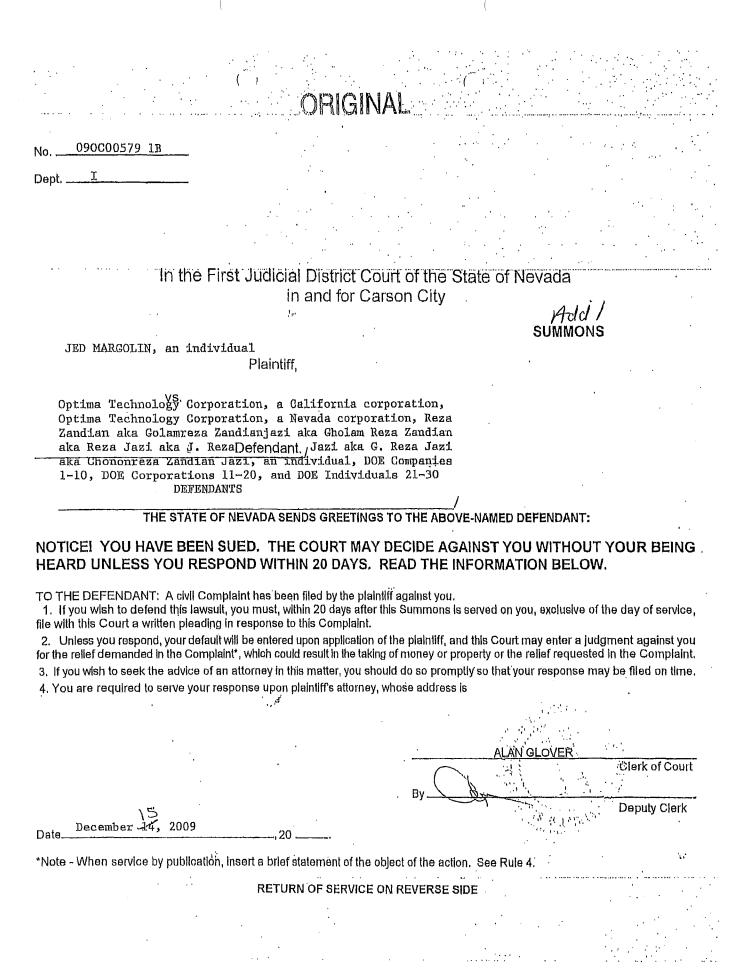
2. Unless you respond, your default will be entered upon application of the plaintiff, and this Court may enter a judgment against you for the relief demanded in the Complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiff's attorney, whose address is

					ALAN GLO	/ER	
		•	7	·		• •	Clerk of Court
	•		р., N	Co /	· · ·	.: *	••
	15		Ву			,	Deputy Clerk
	December ,14, 2009				•		Populy slow
Date_		., 20					

*Note - When service by publication, insert a brief statement of the object of the action. See Rule 4.



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090C00579 1B No.

Dept.

n the First Judicial District Court of the State of Nevada in and for Carson City Add

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SUMMONS

JED MARGOLIN, an individual Plaintiff,

Optima Technology Corporation, a California corporation, Optima Technology Corporation, a Nevada corporation, Reza Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian aka Reza Jazi aka J. RezaDefendant / Jazi aka G. Reza Jazi aka Chononreza Zandian Jazi, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30 DEFENDANTS

THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED DEFENDANT:

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil Complaint has been filed by the plaintiff against you.

1. If you wish to defend this lawsult, you must, within 20 days after this Summons is served on you, exclusive of the day of service, file with this Court a written pleading in response to this Complaint.

2. Unless you respond, your default will be entered upon application of the plaintiff, and this Court may enter a judgment against you for the relief demanded in the Complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiffs attorney, whose address is

Clerk of Court Вγ **Deputy Clerk** 2009 14 December Date.

*Note - When service by publication, insert a brief statement of the object of the action. See Rule 4.

Exhibit 6

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Exhibit 6



August 4, 2011

KELLY G, WATSON¹ MICHAEL D. ROUNDS¹ MATTHEW D. FRANCIS²

ARTHUR A. ZORIO¹ MELISSA P. BARNARD RYAN E. JOHNSON MATTHEW G. HOLLAND ADAM P. McMILLEN² ADAM YOWELL VINH PHAM³

OF COUNSEL-MARC D, FOODMAN^{1,3} STEVEN T, POLİKALAS^{1,4}

¹ Also licensed in Californin
 ² Also licensed in Utah
 ³ Also licensed in Massachusetts
 ⁴Also licensed in Tennessee
 ⁵ Licensed only in California

5371 Kletzke Lane Reno, Nevada 89511 (775) 324-4100 Fax (775) 333-8171 e-mail: reno@watsonrounds.com

777 North Rainbow Boulevard Suite 350 Las Vegas, Novada 89107 (702) 636-4902 Fax (702) 636-4904

One Market-Steuart Tower Suite 1600 Snn Francisco, CA 94105 (415)243-4090 Fnx (415)243-0226

www.watsonrounds.com

Reply to: Reno

VIA FACSIMILE ONLY: 702-383-9950 John Peter Lee, Esq. John Peter Lee, Ltd. 830 Las Vegas Boulevard South Las Vegas, NV 89101

Re: First Judicial District Court Case No. 090C00579

Dear Mr. Lee:

We are in receipt of and have reviewed the Order setting aside Jed Margolin's default judgment against your client in the above referenced matter. Also in the order is a 90 day time period from August 3, 2011 to properly effectuate service on your client.

Please allow this letter to serve as a formal demand that you accept service on behalf of your client, Reza Zandian. Also, it is demanded that you provide us with a current address for your client. It is demanded that you agree to accept service and provide this information to my office by 5:00 p.m. on August 8, 2011.

If you do not agree to accept service on behalf of your client and if you are not willing to provide his current address, please explain why so that we can properly serve your client in this case.

I look forward to your professional cooperation in this matter.

Regards,

Adam P. McMillen WATSON ROUNDS A Professional Corporation

Exhibit 7

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Exhibit 7

JOHN PETER LEE, LTD.

ATTORNEYS AT LAW-830 LAS VECAS BOULEVARD SOUTH LAS VECAS, NEVADA 89101 TELEPHONE (702) 382-4044 FACSIMILE (702) 383-9950 E-MAIL: Info@johnpeterlee.com

August 8, 2011

Fax: (702) 333-8171

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Adam P. McMillan WATSON ROUNDS A Professional Corporation 777 North Rainbow Boulevard Suite 350 Las Vegas, Nevada 89511

Re: First Judicial District Court Case No. 090C00579

Dear Mr. McMillan:

Your letter of August 4, 2011, is acknowledged. Our response is as follows:

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с., *г*

11 . 1

We cannot accept service, nor can we give you Reza Zandian's current address. Except to indicate that he does not reside in Nevada at the present time and is not subject to the jurisdiction of the courts of this State within the provisions of the litigation commenced by your firm involving an Arizona judgment which cannot be domesticated in Nevada,

Yours truly,

JOHN PETER LEE, LTD.

Dictated but not read

John Peter Lee, Esq.

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JPL/mh

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Exhibit 8

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Exhibit 8

No. 090C00579 1B

Dept No. ____

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

SUMMONS

JED MARGOLIN, an Individual,

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Plaintiff,

۷.

OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,

Defendants. / THE STATE OF NEVADA SENDS GREETINGS TO: <u>REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM</u> <u>REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI</u>

NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil complaint or petition has been filed by the plaintiff(s) against you.

1. If you wish to defend this lawsuit, you must, within 20 days after this summons is served on you, exclusive of the day of service, file with the Clerk of the Court a written pleading in response to this Complaint.

2. Unless you respond, a default will be entered upon application of the plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiff's attorney, whose address is

Matthew D. Francis	ALAN GLOVER	
Adam McMillen Watson Rounds 5371 Kletzke Lane	Bv	Clerk of Court
Reno, Nevada 89511		Deputy Clerk
Date	. 20	

*Note - When served by publication, insert a brief statement of the object of the action. See Rule 4.

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a copy of the Summons attached to a cop		f Nouada that the for	againg in true and correct	
I declare under penalty of perjury under t			· · ·	•
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STATE OF NEVADA SS.			/ADA SHERIFF'	
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NOTE -

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If service is made in any manner permitted by Rule 4 other than personally upon the defendant, or is made outside the United States, a special affidavit or return must be made.

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No. 090C005791B

Dept No.

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

JED MARGOLIN, an individual,

Plaintiff,

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SUMMONS

OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI, aka G.REZA JAZI aka CHONONREZA ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,

THE STATE OF NEVADA SENDS GREETINGS TO: OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation

NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil complaint or petition has been filed by the plaintiff(s) against you.

Defendants.

1. If you wish to defend this lawsult, you must, within 20 days after this summons is served on you, exclusive of the day of service, file with the Clerk of the Court a written pleading in response to this Complaint.

2. Unless you respond, a default will be entered upon application of the plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiff's attorney, whose address is

Matthew D. Francis	ALAN GLOVER	
Adam McMillen		Clerk of Court
Watson Rounds		
5371 Kietzke Lane	Ву	
Reno, Nevada 89511		Deputy Clerk
Date	. 20	

*Note - When served by publication, insert a brief statement of the object of the action. See Rule 4.

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a copy of the Summ	nons allached to a copy	/ of the Complaint.			
I declare under per	nally of perjury under th	e law of the State	of Nevada that	the foregoing is true and c	orrect.
Executed this	day of			Signature	of person making service
STATE OF NEVA	ADA			NEVADA SHER	
CARSON CITY	SS.			(For Use of Sheri	if of Carson City)
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State of Nevada, a	copy of the Summons	atlached to a copy	of the Compla	lint.	
				Sheri	ff of Carson Cily, Nevada
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No. 090C00579 1B

Dept No. __I

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

JED MARGOLIN, an individual,

Plaintiff,

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SUMMONS

OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI, aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30, Defendants.

THE STATE OF NEVADA SENDS GREETINGS TO: OPTIMA TECHNOLOGY CORPORATION, a California corporation

NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT: A civil complaint or petition has been filed by the plaintiff(s) against you.

1. If you wish to defend this lawsuit, you must, within 20 days after this summons is served on you, exclusive of the day of service, file with the Clerk of the Court a written pleading in response to this Complaint.

2. Unless you respond, a default will be entered upon application of the plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the complaint*, which could result in the taking of money or property or the relief requested in the Complaint.

3. If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. You are required to serve your response upon plaintiff's attorney, whose address is

Matthew D. Francis	ALAN GLC	OVER
Adam McMillen		Clerk of Court
Watson Rounds 5371 Kietzke Lane	Ви	
Reno, Nevada 89511	-)	Deputy Clerk
Date	. 20	

*Note - When served by publication, insert a brief statement of the object of the action. See Rule 4.

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COUNTY OF		*		
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the within named defendant, on the	day of _		, by delivering to	o the said defendant,
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a copy of the Summons attached to a copy	of the Complair	nt.		
I declare under penalty of perjury under the	e law of the Stat	e of Nevada Ih	at the foregoing is true and corre	ct,
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, , , ,			Signature of p	ərson making sərvicə
		INC BUILDEN		
STATE OF NEVADA 🁔			NEVADA SHERIFI	F'S RETURN
- SS.			(For Use of Sheriff o	of Carson City)
CARSON CITY				
I hereby certify and return that I received th				
and personally served the same upon				
on the day of				ally, In Carson City,
State of Nevada, a copy of the Summons a	illached lo a cop	by of the Comp	plaint.	
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			Sheriff of	Carson Cily, Nevada
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Date, 20		Бу <u></u>		Deputy
STATE OF NEVADA	T.		AFFIDAVIT OF MA	ILING
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the within named defendant, at				
that there is a regular communication by m				
I declare under penalty of perjury under th	•			ect.
Executed this day of _	4	20		
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NOTE -

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If service is made in any manner permitted by Rule 4 other than personally upon the defendant, or is made outside the United States, a special affidavit or return must be made.

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1 2 3 4 5 6 7	Matthew D. Francis (6978) Adam P. McMillen (10678) WATSON ROUNDS 5371 Kietzke Lane Reno, NV 89511 Telephone: 775-324-4100 Facsimile: 775-333-8171 Attorneys for Plaintiff Jed Margolin	REC'D & FILED 2011 SEP 27 PM 5: 02 ALAN GLOVER BY DEPUTY CLERH						
8	In The First Judicial District Co	urt of the State of Nevada						
9	In and for Carson City							
10	JED MARGOLIN, an individual,							
11	Plaintiff,	Case No.: 090C00579 1B						
12	vs.	Dept. No.: 1						
13	OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA	[PROPOSED] AMENDED ORDER						
14	TECHNOLOGY CORPORATION, a Nevada	ALLOWING SERVICE BY PUBLICATION						
15	corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI							
16	aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI							
17	aka G. REZA JAZI aka GHONONREZA ZANDIAN JAZI, an individual, DOE							
18	Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,							
19	Defendants.							
20								
21 22	Plaintiff Jed Margolin has sought the Order	of this Court allowing service by publication						
23	as against Defendants Optima Technology Corpora	tion, a California corporation, Optima						
24	Technology Corporation. a Nevada corporation, and	l Reza Zandian, aka Golamreza Zandianjazi,						
25	aka Gholam Reza Zandian aka Reza Jazi aka J. Rez	a Jazi aka G. Reza Jazi aka Ghononreza						
26	Zandian Jazi, for up to four weeks following the iss	uance thereof.						
27	This Court has reviewed all pleadings and p	apers on file herein and is fully informed						
28	concerning all relevant facts and issues. IT IS THE	REFORE ORDERED AS FOLLOWS:						
	1							

Service of process as against Defendants may be made by publication by publishing such Summons in the San Diego Union-Tribune, the Reno Gazette-Journal, and the Las Vegas Review Journal for a period of four weeks and said publication to occur at least once a week during said time.

IT IS SO ORDERED:

Dated: September 27 20(1

mell DISTRICT COURT JUDGE

SUBMITTED BY: Adam P. McMillen (10678) ATSON ROUNDS 5371 Kietzke Lane Reno, NV 89511 Telephone: 775-324-4100 Facsimile: 775-333-8171



January 8, 2010

KELLY (I, WATSON ¹ MICHAEL D, ROUNDS ¹ MATTHEW D, FRANCIS ²

ARTHUR A, ZORIO¹ CASSANDRA P, JOSEPH¹ MELISSA P, BARNARD RYAN E, JOHNSON TARA A, SHIROFF MATTHEW G, HOLLAND ADAM P, MeMILLEN² ELIZA BECHTOLD⁴ ADAM YOWELL

OF COUNSEL-MARC D. FOODMAN ^{1,3}

¹ Also licensed in California
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Reply to: Reno

John Peter Lee, Esq. John Peter Lee, Ltd. 830 Las Vegas Boulevard South Las Vegas, NV 89101

Re: Optima Technology Corporation and Reza Zandian

Dear Mr. Lee:

We represent Mr. Jed Margolin in a case pending in the First Judicial District Court for the State of Nevada in and for Carson City, Case No. 09 0C 00579 1B captioned Jed Margolin v. Optima Technology Corporation (CA), Optima Technology Corporation (NV), Reza Zandian aka Golamreza Zandianjazi aka aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka Ghonomreza Zandian Jazi (the Action). Copies of the summonses and complaint filed in the Action are enclosed.

We understand that at one time you represented one or more of the Defendants named in the Action. We are attempting to effectuate service of the enclosed summonses and complaint on Mr. Zandian and the Defendant entities and have been unsuccessful thus far. Please inform me whether you currently represent Mr. Zandian or the Defendant entities, and if so, whether you will accept service on behalf of any of the Defendants. If you refuse or cannot accept service on behalf of any of the Defendants, please provide any information possible regarding the whereabouts of any of the Defendants. Alternatively, please provide copies of the summonses and complaint to the Defendants.

Please inform me by January 29, 2010 whether or not you will accept service of the summonses and complaint on behalf of any of the Defendants, or whether you



John Peter Lee, Esq. January 8, 2010 Page 2

will take any other action requested herein. I look forward to hearing from you.

Sincerely,

Cassandra P. Joseph WATSON ROUNDS A Professional Corporation



August 4, 2011

KELLY G, WATSON¹ MICHAEL D. ROUNDS¹ MATTHEW D. FRANCIS²

ARTHUR A. ZORIO¹ MELISSA P. BARNARD RYAN E. JOHNSON MATTHEW G. HOLLAND ADAM P. McMILLEN² ADAM YOWELL VINH PHAM³

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Reply to: Reno

VIA FACSIMILE ONLY: 702-383-9950 John Peter Lee, Esq. John Peter Lee, Ltd. 830 Las Vegas Boulevard South Las Vegas, NV 89101

Re: First Judicial District Court Case No. 090C00579

Dear Mr. Lee:

We are in receipt of and have reviewed the Order setting aside Jed Margolin's default judgment against your client in the above referenced matter. Also in the order is a 90 day time period from August 3, 2011 to properly effectuate service on your client.

Please allow this letter to serve as a formal demand that you accept service on behalf of your client, Reza Zandian. Also, it is demanded that you provide us with a current address for your client. It is demanded that you agree to accept service and provide this information to my office by 5:00 p.m. on August 8, 2011.

If you do not agree to accept service on behalf of your client and if you are not willing to provide his current address, please explain why so that we can properly serve your client in this case.

I look forward to your professional cooperation in this matter.

Regards,

Adam P. McMillen WATSON ROUNDS A Professional Corporation

JOHN PETER LEE, LTD.

ATTORNEYS AT LAW-830 LAS VECAS BOULEVARD SOUTH LAS VECAS, NEVADA 89101 TELEPHONE (702) 382-4044 FACSIMILE (702) 383-9950 E-MAIL: Info@johnpeterlee.com

August 8, 2011

Fax: (702) 333-8171

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Adam P. McMillan WATSON ROUNDS A Professional Corporation 777 North Rainbow Boulevard Suite 350 Las Vegas, Nevada 89511

Re: First Judicial District Court Case No. 090C00579

Dear Mr. McMillan:

Your letter of August 4, 2011, is acknowledged. Our response is as follows:

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We cannot accept service, nor can we give you Reza Zandian's current address. Except to indicate that he does not reside in Nevada at the present time and is not subject to the jurisdiction of the courts of this State within the provisions of the litigation commenced by your firm involving an Arizona judgment which cannot be domesticated in Nevada,

Yours truly,

JOHN PETER LEE, LTD.

Dictated but not read

John Peter Lee, Esq.

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JPL/mh

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