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Electronically Filed
Jun 09 2021 12:31 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

REZA ZANDIAN, A/K/A
GOLAMREZA ZANDIANJAZI,
A/K/A GHOLAM REZA ZANDIAN,
A/K/A REZA JAZI, A/K/A J. REZA
JAZI, A/K/A G. REZA JAZI, A/K/A
GHONOREZA ZANDIAN JAZI, AN
INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,

Respondent.

Supreme Court No. 82559

District Court Case No. 09OC005791B

**RESPONDENT’S MOTION TO DISMISS APPELLANT’S UNTIMELY
APPEAL FOR LACK OF JURISDICTION**

Respondent Jed Margolin hereby moves to dismiss Appellant Reza Zandian’s appeal because it was not filed within 33 days after service of Respondent’s Notice of Entry of Order pursuant to NRAP 4(a)(1).

I. BACKGROUND

On January 19, 2021, the First Judicial District Court entered its Order

1 Granting Plaintiff’s Motion to Void Deeds, Assign Property, For Writ of Execution
2 and to Convey, which is the subject of this appeal. June 9, 2021 Declaration of
3 Matthew D. Francis (“Francis Decl.”), Exhibit 1. On January 22, 2021,
4 Respondent served Appellant with the Notice of Entry of Order of the First Judicial
5 District Court’s Order Granting Plaintiff’s Motion to Void Deeds, Assign Property,
6 For Writ of Execution and to Convey. Francis Decl., Exhibit 2. On February 25,
7 2021, Respondent filed his Notice of Appeal, which was 34 days after Respondent
8 served the aforementioned Notice of Entry of Order. Francis Decl., Exhibit 3.

11 **II. ARGUMENT**

12 NRAP 4(a)(1) provides in pertinent part: “[e]xcept as provided in Rule
13 4(a)(4), a notice of appeal must be filed after entry of a written judgment or order,
14 and no later than 30 days after the date that written notice of entry of the judgment
15 or order appealed from is served.” *Id. see also Healy v. Volkswagenwerk*
16 *Aktiengesellschaft*, 103 Nev. 329, 330, 741 P.2d 432, 433 (1987) (dismissing
17 untimely appeal). This deadline is jurisdictional and an untimely appeal may not
18 be considered. *See Rust v. Clark Cty. School Dist.*, 103 Nev. 686, 688, 747 P.2d
19 1380, 1382 (1987) (holding that “the proper and timely filing of a notice of appeal
20 is jurisdictional”); *see also Ross v. Giacomo*, 97 Nev. 550, 553, 635 P.2d 298, 300
21 (1981) (holding that the requirement that a notice of appeal be filed within the
22 proscribed period "is jurisdictional; an untimely appeal may not be considered"),
23 abrogated on other grounds by *Winston Products Co. v. DeBoer*, 122 Nev. 517,
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1 524, 134 P.3d 726, 731 (2006); *see also Alvis v. State*, 99 Nev. 184, 185, 660 P.2d
2 980, 981 (1983) (dismissing untimely appeal), overruled on other grounds by AA
3
4 *Primo Builders, LLC v. Washington*, 126 Nev. 578, 585, 245 P.3d 1190, 1195
5 (2010); *see also Healy*, 103 Nev. at 330, 741 P.2d at 433.

6 Here, Appellant’s Notice of Appeal was filed late – 34 days after service of
7 the Notice of Entry of Order. Francis Decl., Exhibit 3. As such, Appellant failed
8 to comply with NRAP 4(a)(1) and his appeal should be dismissed.

9
10 **III. CONCLUSION**

11 For all of the foregoing reasons, Respondent’s Motion to Dismiss
12 Appellant’s Untimely Appeal for Lack of Jurisdiction should be granted, and
13 Appellant’s appeal should be dismissed.
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DATED this 9th day of June, 2021.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: */s/Matthew D. Francis*

Matthew D. Francis
Nevada Bar No. 6978
Arthur A. Zorio
Nevada Bar No. 6547
5520 Kietzke Lane, Suite 100
Reno, NV 89511
Telephone: 775.324.4100
Facsimile: 775.333.8171
Email: mfrancis@bhfs.com
azorio@bhfs.com

Attorneys for Respondent JED MARGOLIN

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CERTIFICATE OF SERVICE

Pursuant to NRAP 25(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and on this 9th day of June, 2021, I served the document entitled **RESPONDENT’S MOTION TO DISMISS APPELLANT’S UNTIMELY APPEAL FOR LACK OF JURISDICTION** on the parties listed below in the manner described below:

Mark Forsberg, Esq.
Rick Oshinski, Esq.
Oshinski & Forsberg, Ltd.
504 E. Musser Street, Suite 202
Carson City, NV 89701
rick@oshinskiforsberg.com
mark@oshinskiforsberg.com

VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with first class postage thereon fully prepaid, in the United States mail at Reno, Nevada as addressed to the foregoing party.

VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number as last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by the facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which it was transmitted.

VIA COURIER: by delivering a copy of the document to Federal Express for first priority delivery to the foregoing party in Paris, France.

VIA ELECTRONIC SERVICE: by electronically filing the document with the Clerk of the Court using the ECF system which served the foregoing parties electronically:

/s/ Nancy R. Lindsley
Employee of Brownstein Hyatt
Farber Schreck, LLP

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IN THE SUPREME COURT OF THE STATE OF NEVADA

REZA ZANDIAN, A/K/A
GOLAMREZA ZANDIANJAZI,
A/K/A GHOLAM REZA ZANDIAN,
A/K/A REZA JAZI, A/K/A J. REZA
JAZI, A/K/A G. REZA JAZI, A/K/A
GHONOREZA ZANDIAN JAZI, AN
INDIVIDUAL,

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,

Respondent.

Supreme Court No. 82559

District Court Case No. 09OC005791B

DECLARATION OF MATTHEW D. FRANCIS

I, Matthew D. Francis, do hereby declare and state as follows:

1. I have personal knowledge of the following facts and if called as a witness I could and would testify competently to them. This declaration is based upon my personal knowledge, and is made in support of Respondent Jed Margolin’s Motion to Dismiss Appellant’s Untimely Appeal for Lack of Jurisdiction.

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2. Attached hereto as Exhibit 1 is a true and correct copy of the First Judicial District Court’s Order Granting Plaintiff’s Motion to Void Deeds, Assign Property, For Writ of Execution and to Convey.

3. Attached hereto as Exhibit 2 is a true and correct copy of Respondent’s Notice of Entry of Order of the First Judicial District Court’s Order Granting Plaintiff’s Motion to Void Deeds, Assign Property, For Writ of Execution and to Convey.

4. Attached hereto as Exhibit 3 is a true and correct copy of Appellant’s Notice of Appeal.

I declare under penalty of perjury pursuant to the laws of the State of Nevada that the foregoing is true and correct.

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DATED this 9th day of June, 2021.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

By: */s/ Matthew D. Francis*

Matthew D. Francis
Nevada Bar No. 6978
Arthur A. Zorio
Nevada Bar No. 6547
5520 Kietzke Lane, Suite 100
Reno, NV 89511
Telephone: 775.324.4100
Facsimile: 775.333.8171
Email: mfrancis@bhfs.com
azorio@bhfs.com

Attorneys for Respondent JED MARGOLIN

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CERTIFICATE OF SERVICE

Pursuant to NRAP 25(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP, and on this 9th day of June, 2021, I served the document entitled **DECLARATION OF MATTHEW D. FRANCIS** on the parties listed below in the manner described below:

Mark Forsberg, Esq.
Rick Oshinski, Esq.
Oshinski & Forsberg, Ltd.
504 E. Musser Street, Suite 202
Carson City, NV 89701
rick@oshinskiforsberg.com
mark@oshinskiforsberg.com

VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with first class postage thereon fully prepaid, in the United States mail at Reno, Nevada as addressed to the foregoing party.

VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number as last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by the facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which it was transmitted.

VIA COURIER: by delivering a copy of the document to Federal Express for first priority delivery to the foregoing party in Paris, France.

VIA ELECTRONIC SERVICE: by electronically filing the document with the Clerk of the Court using the ECF system which served the foregoing parties electronically:

/s/ Nancy R. Lindsley
Employee of Brownstein Hyatt
Farber Schreck, LLP

Exhibit 1

Exhibit 1

1 Case No. 09 0C 00579 1B

2 Dept. No. I

REC'D & FILED
2021 JAN 19 PM 2:40
AUSREY DWLATY
CLERK
BY _____

3
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5 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
6 IN AND FOR CARSON CITY

7
8 JED MARGOLIN, an individual,

9 Plaintiff,

10 vs.

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

22 Defendants.

**ORDER GRANTING PLAINTIFF'S
MOTION TO VOID DEEDS,
ASSIGN PROPERTY, FOR WRIT
OF EXECUTION AND TO
CONVEY**

23 WHEREAS, on May 3, 2016, Plaintiff Jed Margolin filed and served his Motion to Void
24 Deeds, Assign Property, and For Writ of Execution and to Convey;

25 WHEREAS, an Opposition to Plaintiffs Motion to Void Deeds, Assign Property, and For
26 Writ of Execution and to Convey was due by May 20, 2016, but no opposition was filed; and

27 WHEREAS, this Court has reviewed and considered Plaintiffs Motion to Void Deeds,
28 Assign Property, and For Writ of Execution and to Convey, and finds that the Motion should be
granted.

Based on the foregoing, and good cause appearing,

IT IS HEREBY ORDERED that Plaintiffs Motion to Void Deeds, Assign Property, and
For Writ of Execution and to Convey is hereby GRANTED;

1 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 001-
2 -660-034 located in Elko County, Nevada, contained in Elko County Doc# 684351 - Grant
3 Deed recorded 03/17/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
4 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
5 112.210(1);

6 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 007-
7 151-12 located in Churchill County, Nevada, contained in Churchill County Doc# 439670 -
8 Grant Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
9 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
10 112.210(1);

11 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 007-
12 151-77 located in Churchill County, Nevada, contained in Churchill County Doc# 439671 -
13 Grant Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
14 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
15 112.210(1);

16 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No, 009-
17 331-04 located in Churchill County, Nevada, contained in Churchill County Doc# 439672 -
18 Grant Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
19 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
20 112.210(1);

21 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 079-
22 150-12 located in Washoe County, Nevada, contained in Washoe County Doc# 4335754 - Grant
23 Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
24 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
25 112.210(1);

26 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN Nos. 079-
27 150-09, 079-150-10, 079-150-13, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-040-
28 02, and 084-140-17 located in Washoe County, Nevada, contained in Washoe County Doc

1 #4335755 - Grant Deed recorded 03/18/2014, were fraudulent transfers pursuant to NRS
2 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and are void and is hereby set aside
3 pursuant to NRS 112.210(1);

4 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN Nos. 006-
5 052-04, 006-052-05 and 006-052-06 located in Lyon County, Nevada, contained in Lyon
6 County Doc# 521532 - Grant Deed recorded 5/21/2014, were fraudulent transfers pursuant to
7 NRS 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and are void and is hereby set aside
8 pursuant to NRS 112.210(1);

9 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 015-
10 311-02 located in Lyon County, Nevada, contained in Lyon County Doc# 521533 - Grant Deed
11 recorded 5/21/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS 112.180(2),
12 and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS 112.210(1);

13 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN Nos. 015-
14 311-18 and 015-311-19 located in Lyon County, Nevada, contained in Lyon County Doc#
15 521531 - Grant Deed recorded 5/21/2014, were fraudulent transfers pursuant to NRS
16 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and are void and is hereby set aside
17 pursuant to NRS 112.210(1);

18 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 071-
19 02-000-005 located in Clark County, Nevada, contained in Clark County Doc# 20140530-
20 0001037 - Grant Deed recorded 05/30/2014, was a fraudulent transfer pursuant to NRS
21 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and is void and is hereby set aside
22 pursuant to NRS 112.210(1);

23 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 071-
24 02-000-013 located in Clark County, Nevada, contained in Clark County Doc# 20140530-
25 0001038 - Grant Deed recorded 05/30/2014, was a fraudulent transfer pursuant to NRS
26 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and is void and is hereby set aside
27 pursuant to NRS 112.210(1);
28

1 IT IS FURTHER ORDERED that all applicable County Sheriffs or other authorized
2 officers in the State of Nevada be authorized to execute upon the June 24, 2013 Default
3 Judgment in the sum of \$1,495,775.74 which includes interest at the legal rate, pursuant to NRS
4 17.130, therein from the date of default until the judgment is satisfied, through the seizure of
5 Defendant Reza Zandian's bank accounts, investment accounts, certificates of deposit, annuities,
6 wages, and real and personal property;

7 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
8 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
9 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN No.
10 001-660-034 located in Elko County, Nevada;

11 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
12 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
13 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN Nos.
14 007-151-12, 007-151-77, and 009-331-04 located in Churchill County, Nevada;

15 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
16 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
17 him from selling, assigning, divesting, encumbering or dividing his interest in any of APN Nos.
18 079-150-12, 079-150-09, 079-150-13, 084-040-04, 084-040-06, 084-040-10, and 084-140-17
19 located in Washoe County, Nevada;

20 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
21 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
22 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN Nos.
23 APN Nos. 006-052-04, 006-052-05, 006-052-06, 015-311-02 015-311-18, and 015-311-19
24 located in Lyon County, Nevada;

25 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
26 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
27 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN Nos.
28 071-02-000-005 and 071-02-000-013 located in Clark County, Nevada;

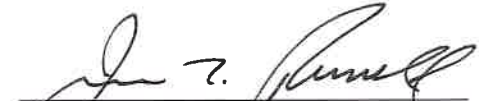
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IT IS FURTHER ORDERED that pursuant to NRS 21.190 and 21.220(4), APN No. 071-02-000-013 located in Clark County, Nevada has been and is conveyed to Plaintiff;

IT IS FURTHER ORDERED that pursuant to NRS 21.190 and 21.220(4), APN No. 071-02-000-005 located in Clark County, Nevada has been and is conveyed to Plaintiff; and


IT IS FURTHER ORDERED that pursuant to NRS 21.190 and 21.220(4), APN No. 079-150-12 located in Washoe County, Nevada has been and is conveyed to Plaintiff.

DATED: This 19th day of January, 2021.



JAMES T. RUSSELL
DISTRICT COURT JUDGE

Respectfully submitted by:



Matthew D. Francis, SBN 6978
Brownstein Hyatt Farber Schreck, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775-324-4100

Exhibit 2

Exhibit 2

1 Matthew D. Francis, Bar No. 6978
2 mfrancis@bhfs.com
3 Arthur A. Zorio, Bar No. 6547
4 azorio@bhfs.com
5 BROWNSTEIN HYATT FARBER SCHRECK, LLP
6 5371 Kietzke Lane,
7 Reno, Nevada 89511
8 Telephone: (775) 324-4100
9 Facsimile: (775) 333-8171

10 *Attorneys for Plaintiff JED MARGOLIN*

REC'D & FILED ✓
2021 JAN 25 PM 1:12

AUBREY ROWLATT
CLERK
BY [Signature] DEPUTY

11 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
12 IN AND FOR CARSON CITY

13 JED MARGOLIN, an individual,
14 Plaintiff,

CASE NO. 09 OC 00579 1B

DEPT NO. 1

15 v.

NOTICE OF ENTRY OF ORDER

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

21 Notice is hereby given that the Court entered its Order Granting Plaintiff's Motion to
22 Void Deeds, Assign Property, For Writ of Execution and to Convey on January 19, 2021. A
23 copy of said Order is attached hereto as Exhibit 1.

AFFIRMATION Pursuant to NRS 239B.030

24 The undersigned does hereby affirm that the preceding document does not contain
25 the social security number of any person.
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DATED: January 21, 2021

BROWNSTEIN HYATT FARBER SCHRECK, LLP

BY: 

Matthew D. Francis (6978)
Arthur A. Zorio (6547)
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171

Attorneys for Plaintiff Jed Margolin

BROWNSTEIN HYATT FARBER SCHRECK, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775-324-4100

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I certify that I am an employee of BROWNSTEIN HYATT
3 FARBER SCHRECK, LLP, and on this 22nd day of January, 2021, I served the document entitled
4 **NOTICE OF ENTRY OF ORDER** on the parties listed below via the following:

5 Reza Zandian
6 9 MacArthur Place, Unit 2105
7 Santa Ana, CA 92707-6753

8 Gholam Reza Zandian Jazi
9 6 rue Edouard Fournier
10 75116 Paris
11 France

12 Email: rezazand@hotmail.com

13 **VIA FIRST CLASS U.S. MAIL:** by placing a true copy thereof enclosed in a sealed
14 envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada for delivery
15 to the foregoing.

16 **VIA COURIER:** by delivering a copy of the document to a courier service for over-night
17 delivery to the foregoing parties.

18 **VIA ELECTRONIC SERVICE:** by electronically filing the document with the Clerk of
19 the Court using the ECF system which served the foregoing parties electronically.

20 **VIA ELECTRONIC MAIL:** by electronically transmitting a courtesy copy of the
21 document to the Defendant Reza Zandian at the foregoing email address.

22 
23 Employee of Brownstein Hyatt Farber
24 Schreck, LLP
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EXHIBIT LIST

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1. Order Granting Plaintiff's Motion to Void Deeds, Assign Property,
For Writ of Execution and to Convey

5 Pages

Exhibit 1

Exhibit 1

1 Case No. 09 OC 00579 1B

REC'D & FILED

2 Dept. No. I

2021 JAN 19 PM 2:40

AUGREY ROWLATT
CLERK

BY S. BARAJAS

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4
5 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
6 IN AND FOR CARSON CITY

7 JED MARGOLIN, an individual,

8 Plaintiff,

9 vs.

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

21 Defendants.

**ORDER GRANTING PLAINTIFF'S
MOTION TO VOID DEEDS,
ASSIGN PROPERTY, FOR WRIT
OF EXECUTION AND TO
CONVEY**

22 WHEREAS, on May 3, 2016, Plaintiff Jed Margolin filed and served his Motion to Void
23 Deeds, Assign Property, and For Writ of Execution and to Convey;

24 WHEREAS, an Opposition to Plaintiffs Motion to Void Deeds, Assign Property, and For
25 Writ of Execution and to Convey was due by May 20, 2016, but no opposition was filed; and

26 WHEREAS, this Court has reviewed and considered Plaintiffs Motion to Void Deeds,
27 Assign Property, and For Writ of Execution and to Convey, and finds that the Motion should be
28 granted.

Based on the foregoing, and good cause appearing,

IT IS HEREBY ORDERED that Plaintiffs Motion to Void Deeds, Assign Property, and
For Writ of Execution and to Convey is hereby GRANTED;

1 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 001-
2 -660-034 located in Elko County, Nevada, contained in Elko County Doc# 684351 - Grant
3 Deed recorded 03/17/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
4 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
5 112.210(1);

6 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 007-
7 151-12 located in Churchill County, Nevada, contained in Churchill County Doc# 439670 -
8 Grant Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
9 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
10 112.210(1);

11 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 007-
12 151-77 located in Churchill County, Nevada, contained in Churchill County Doc# 439671 -
13 Grant Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
14 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
15 112.210(1);

16 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No, 009-
17 331-04 located in Churchill County, Nevada, contained in Churchill County Doc# 439672 -
18 Grant Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
19 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
20 112.210(1);

21 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 079-
22 150-12 located in Washoe County, Nevada, contained in Washoe County Doc# 4335754 - Grant
23 Deed recorded 03/18/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS
24 112.180(2), and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS
25 112.210(1);

26 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN Nos. 079-
27 150-09, 079-150-10, 079-150-13, 084-040-04, 084-040-06, 084-040-10, 084-130-07, 084-040-
28 02, and 084-140-17 located in Washoe County, Nevada, contained in Washoe County Doc

1 #4335755 - Grant Deed recorded 03/18/2014, were fraudulent transfers pursuant to NRS
2 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and are void and is hereby set aside
3 pursuant to NRS 112.210(1);

4 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN Nos. 006-
5 052-04, 006-052-05 and 006-052-06 located in Lyon County, Nevada, contained in Lyon
6 County Doc# 521532 - Grant Deed recorded 5/21/2014, were fraudulent transfers pursuant to
7 NRS 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and are void and is hereby set aside
8 pursuant to NRS 112.210(1);

9 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 015-
10 311-02 located in Lyon County, Nevada, contained in Lyon County Doc# 521533 - Grant Deed
11 recorded 5/21/2014, was a fraudulent transfer pursuant to NRS 112.180(1)(a), NRS 112.180(2),
12 and NRS 112.150(7), and is void and is hereby set aside pursuant to NRS 112.210(1);

13 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN Nos. 015-
14 311-18 and 015-311-19 located in Lyon County, Nevada, contained in Lyon County Doc#
15 521531 - Grant Deed recorded 5/21/2014, were fraudulent transfers pursuant to NRS
16 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and are void and is hereby set aside
17 pursuant to NRS 112.210(1);

18 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 071-
19 02-000-005 located in Clark County, Nevada, contained in Clark County Doc# 20140530-
20 0001037 - Grant Deed recorded 05/30/2014, was a fraudulent transfer pursuant to NRS
21 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and is void and is hereby set aside
22 pursuant to NRS 112.210(1);

23 IT IS FURTHER ORDERED that Defendant Reza Zandian's transfer of APN No. 071-
24 02-000-013 located in Clark County, Nevada, contained in Clark County Doc# 20140530-
25 0001038 - Grant Deed recorded 05/30/2014, was a fraudulent transfer pursuant to NRS
26 112.180(1)(a), NRS 112.180(2), and NRS 112.150(7), and is void and is hereby set aside
27 pursuant to NRS 112.210(1);
28

1 IT IS FURTHER ORDERED that all applicable County Sheriffs or other authorized
2 officers in the State of Nevada be authorized to execute upon the June 24, 2013 Default
3 Judgment in the sum of \$1,495,775.74 which includes interest at the legal rate, pursuant to NRS
4 17.130, therein from the date of default until the judgment is satisfied, through the seizure of
5 Defendant Reza Zandian's bank accounts, investment accounts, certificates of deposit, annuities,
6 wages, and real and personal property;

7 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
8 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
9 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN No.
10 001-660-034 located in Elko County, Nevada;

11 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
12 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
13 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN Nos.
14 007-151-12, 007-151-77, and 009-331-04 located in Churchill County, Nevada;

15 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
16 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
17 him from selling, assigning, divesting, encumbering or dividing his interest in any of APN Nos.
18 079-150-12, 079-150-09, 079-150-13, 084-040-04, 084-040-06, 084-040-10, and 084-140-17
19 located in Washoe County, Nevada;

20 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
21 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
22 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN Nos.
23 APN Nos. 006-052-04, 006-052-05, 006-052-06, 015-311-02 015-311-18, and 015-311-19
24 located in Lyon County, Nevada;

25 IT IS FURTHER ORDERED that an injunction is hereby issued pursuant to NRS
26 112.210(1)(c)(1) and (3) against Defendant Reza Zandian and all persons acting in concert with
27 him from selling, assigning, divesting, encumbering, or dividing his interest in any of APN Nos.
28 071-02-000-005 and 071-02-000-013 located in Clark County, Nevada;

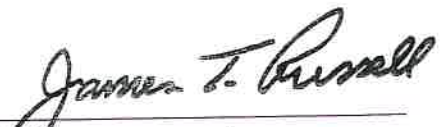
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IT IS FURTHER ORDERED that pursuant to NRS 21.190 and 21.220(4), APN No. 071-02-000-013 located in Clark County, Nevada has been and is conveyed to Plaintiff;

IT IS FURTHER ORDERED that pursuant to NRS 21.190 and 21.220(4), APN No. 071-02-000-005 located in Clark County, Nevada has been and is conveyed to Plaintiff; and


IT IS FURTHER ORDERED that pursuant to NRS 21.190 and 21.220(4), APN No. 079-150-12 located in Washoe County, Nevada has been and is conveyed to Plaintiff.

DATED: This 19th day of January, 2021.



JAMES T. RUSSELL
DISTRICT COURT JUDGE

Respectfully submitted by:



Matthew D. Francis, SBN 6978
Brownstein Hyatt Farber Schreck, LLP
5371 Kietzke Lane
Reno, Nevada 89511
775-324-4100

Exhibit 3

Exhibit 3

Notice of Appeal to the Supreme Court From a Judgment or Order of a District Court

No. 09 0C 00579 1B

FILED
2021 FEB 25 PM 1:10

AUDREY BOWLATT
CLERK
Dept. No. 1

BY  DEPUTY

IN THE FIRST JUDICIAL DISTRICT COURT OF THE
STATE OF NEVADA IN AND FOR
THE COUNTY OF CARSON CITY

Plaintiff } JED MARGOLIN

v. }

Defendant } GHOLAMREZA ZANDIAN JAZI aka REZA ZANDIAN

NOTICE OF APPEAL

Notice is hereby given that C. D., defendant above named, hereby appeals to the Supreme Court of Nevada (from the final judgment) (from the order (describing it)) entered in this action on the 19th day of January, 2021 recorded on January 25, 2021

Address

Per se

Reza Zandian

6 Rue Edouard Fournier

75116 Paris France



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