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**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
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 GHONONREZA
ZANDIAN JAZI, an individual, DOE
Companies 1-10, DOE Corporations 11-20,
and DOE Individuals 21-30,**

Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

**OPPOSITION TO MOTION TO
DISMISS AND COUNTERMOTIONS
TO STRIKE AND FOR LEAVE TO
AMEND THE COMPLAINT**

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22 COMES NOW Plaintiff Jed Margolin and hereby files this opposition to Defendant
23 Reza Zandian's ("Zandian") motion to dismiss on a special appearance and Plaintiff's
24 counter motions to strike the motion to dismiss and in the alternative for leave to amend the
25 complaint. This opposition and counter motions are based on the following Memorandum of
26 Points and Authorities and all pleadings, motions, and papers on file herein.

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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. FACTUAL BACKGROUND

3 Plaintiff Jed Margolin is the named inventor on numerous patents and patent
4 applications, including United States Patent No. 5,566,073 (“the ‘073 Patent”), United States
5 Patent No. 5,904,724 (“the ‘724 Patent”), United States Patent No. 5,978,488 (“the ‘488
6 Patent”) and United States Patent No. 6,377,436 (“the ‘436 Patent”) (collectively “the
7 Patents”). *See* Complaint, ¶ 9. Mr. Margolin is the legal owner and owner of record for the
8 ‘488 and ‘436 Patents, and has never assigned those patents. *Id.*, ¶ 10. In 2004, Mr. Margolin
9 granted to Optima Technology Group (“OTG”), a Cayman Islands Corporation specializing in
10 aerospace technology, a Power of Attorney regarding the ‘073 and ‘724 Patents. *Id.*, ¶ 11.
11 Subsequently, Mr. Margolin assigned the ‘073 and ‘724 Patents to OTG. *Id.* ¶ 13. In
12 exchange for the Power of Attorney and later Assignment, OTG agreed to pay Mr. Margolin
13 royalties based on OTG’s licensing of the ‘073 and ‘724 Patents. *Id.*

14 In May 2006, OTG and Mr. Margolin licensed the ‘073 and ‘724 Patents to Geneva
15 Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty
16 agreement between Mr. Margolin and OTG. *Id.*, ¶ 12. In about October 2007, OTG licensed
17 the ‘073 Patent to Honeywell International, Inc., and Mr. Margolin received a royalty payment
18 pursuant to the royalty agreement between Mr. Margolin and OTG. *Id.*, ¶ 14.

19 On about December 5, 2007, Defendant Zandian filed with the U.S. Patent and
20 Trademark Office (“USPTO”) fraudulent assignment documents allegedly assigning all four of
21 the Patents to Optima Technology Corporation (“OTC”), a company apparently owned by
22 Defendant Zandian. *Id.*, ¶ 15; *see also* the fraudulent assignment documents attached hereto as
23 **Exhibit 1.**¹ Upon discovery of the fraudulent filings, Mr. Margolin: (a) filed a report with the
24 Storey County Sheriff’s Department; (b) took action to regain record title to the ‘488 and ‘436
25 Patents that he legally owned; and (c) assisted OTG in regaining record title of the ‘073 and

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28 ¹ The signature on the attached Recordation Form Cover Sheet is that of Reza Zandian; also, the internal address for Optima Technology Corporation, which is apparently another name for Zandian, lists John Peter Lee Limited, 830 Las Vegas Boulevard South, Las Vegas, Nevada 89101, 702-382-4044, info@johnpeterlee.com.

1 '724 Patents that it legally owned and upon which it contracted with Mr. Margolin for
2 royalties. *Id.*, ¶ 16.

3 Shortly before this, Mr. Margolin and OTG had been named as defendants in an action
4 for declaratory relief regarding non-infringement of the '073 and '724 Patents in the United
5 States District Court for the District of Arizona, in a case titled: *Universal Avionics Systems*
6 *Corporation v. Optima Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the "Arizona
7 Action"). *Id.*, ¶ 17. Plaintiff in the Arizona Action asserted that Mr. Margolin and OTG were
8 not the owners of the '073 and '724 Patents, and Mr. Margolin and OTG filed a cross-claim
9 for declaratory relief against Optima Technology Corporation ("Zandian" or "OTC") in order
10 to obtain legal title to the respective patents.

11 On August 18, 2008, the United States District Court for the District of Arizona
12 entered a final judgment in favor of Mr. Margolin and OTG on their declaratory relief action,
13 and ordered that OTC had no interest in the '073 or '724 Patents, and that the assignment
14 documents filed by Zandian with the USPTO were "forged, invalid, void, of no force and
15 effect." *Id.*, ¶ 18.

16 Due to Defendants' fraudulent acts, title to the Patents was clouded and interfered with
17 Plaintiff's and OTG's ability to license the Patents. *Id.*, ¶ 19. In addition, during the period of
18 time Mr. Margolin worked to correct record title of the Patents in the Arizona Action and with
19 the USPTO, he incurred significant litigation and other costs associated with those efforts. *Id.*,
20 ¶ 20.

21 **II. PROCEDURAL BACKGROUND**

22 Plaintiff filed his Complaint on December 11, 2009. The Complaint was personally
23 served on Defendant Zandian on February 2, 2010.² Zandian's answer to the Complaint was
24 due on or before February 22, 2010. Zandian did not answer the Complaint or respond in any
25 way. Almost a year after the Complaint was filed, on December 2, 2010, a default was entered
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² See Affidavit of Service, dated 2/18/10, attached hereto as Exhibit 2.

1 against Zandian. Plaintiff then filed and served a Notice of Entry of Default on Zandian on
2 December 7, 2010 and on his last known attorney on December 16, 2010.

3 On February 25, 2011, Plaintiff filed in this Court and served a certificate of service
4 indicating that the application for entry of default against Zandian was sent to attorney John
5 Peter Lee. On February 28, 2011, Plaintiff filed an application for default judgment against
6 Defendants Zandian, Optima Technology Corporation, a California Corporation, and Optima
7 Technology Corporation, a Nevada Corporation.

8 On March 1, 2011, a default judgment was entered against Zandian and the other
9 defendants for \$121,594.46. On March 7, 2011, notice of entry of that default was filed and
10 served by mail on Zandian and his counsel.

11 On June 9, 2011, Zandian filed the motion to dismiss.

12 III. ARGUMENT

13 **A. SERVICE OF THE SUMMONS AND COMPLAINT WAS** 14 **EFFECTUATED UPON ZANDIAN**

15 NRCP 4 states that service of the summons and complaint shall be made upon the
16 “defendant personally, or by leaving copies thereof at the defendant’s dwelling house or usual
17 place of abode with some person of suitable age and discretion then residing therein, or by
18 delivering a copy of the summons and complaint to an agent authorized by appointment or by
19 law to receive service of process.” NRCP 4(d)(6).

20 In this case, the complaint was filed on December 11, 2009. As Plaintiff was having
21 difficulty serving Zandian, the summons and complaint were mailed to Zandian’s attorney,
22 John Peter Lee, on January 8, 2010, and a request for assistance in serving Zandian was made.
23 *See* Letter, dated 1/8/10, from Cassandra Joseph to John Peter Lee, attached hereto as **Exhibit**
24 **3.**³ Moreover, Zandian was personally served with the summons and complaint on February 2,
25 2010. *See* Affidavit of Service, dated 2/18/10, attached hereto as **Exhibit 2**.

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28 ³ John Peter Lee never responded to Cassandra Joseph’s request for assistance in serving Zandian and the Defendant entities. At least, Mr. Lee never responded until well after the default was entered by filing the instant motion, even though he represented Zandian prior to this action.

1 Therefore, Zandian was served with the summons and complaint and was given proper
2 notice of this lawsuit. In fact, Plaintiff took the additional step of mailing the summons and
3 complaint to Zandian and his lawyer. Unfortunately, for reasons known only to Zandian and
4 his lawyer, Zandian decided not to answer the complaint or otherwise respond to the complaint
5 in a timely manner.

6 **B. THIS COURT HAS JURISDICTION OVER ZANDIAN IN THIS ACTION**

7 Nevada's long arm statute states as follows: "A court of this state may exercise
8 jurisdiction over a party to a civil action on any basis not inconsistent with the Constitution of
9 this state or the Constitution of the United States." NRS 14.065(1). In addition, "[p]ersonal
10 service of summons upon a party outside this state is sufficient to confer upon a court of this
11 state jurisdiction over the party so served if the service is made by delivering a copy of the
12 summons, together with a copy of the complaint, to the party served in the manner provided by
13 statute or rule of court for service upon a person of like kind within this state." NRS
14 14.065(2).

15 In addition, in Nevada, "[t]here are two types of personal jurisdiction: general and
16 specific." *Baker v. Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 527, 532,
17 999 P.2d 1020, 1023 (2000). "General jurisdiction is required in matters where a defendant is
18 held to answer in a forum for causes of action unrelated to his forum activities." *Baker v.*
19 *Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 527, 532, 999 P.2d 1020, 1023
20 (2000). "General jurisdiction over a nonresident will lie where the nonresident's activities in
21 the forum are 'substantial' or 'continuous and systematic.'" *Id.* Said another way, "General
22 jurisdiction over the defendant 'is appropriate where the defendant's forum activities are so
23 'substantial' or 'continuous and systematic' that [he] may be deemed present in the forum.'" *Freeman v. Second Judicial Dist. Court ex rel. County of Washoe*, 116 Nev. 550, 553, 1 P.3d
24 963, 965 (2000).

25 In addition, the following citation acknowledges that there must be minimum contacts
26 for the Court to exercise jurisdiction over a nonresident and states that owning property or
27 doing business within the state is enough to confer jurisdiction:
28

1 We acknowledged in *Metal-Matic, Inc. v. 8th Judicial District Court*, 82 Nev.
2 263, 415 P.2d 617 (1966), citing therein *International Shoe Co. v. State of*
3 *Washington*, 326 U.S. 310, 66 S.Ct. 154, 90 L.Ed. 95 (1945); *McGee v.*
4 *International Life*, 355 U.S. 220, 78 S.Ct. 199, 2 L.Ed.2d 223 (1957); and
5 *Hanson v. Denckla*, 357 U.S. 235, 78 S.Ct. 1228, 2 L.Ed.2d 1283 (1958), that
6 since *Pennoyer v. Neff*, 5 Otto 714, 95 U.S. 714, 24 L.Ed. 565 (1877), a
7 jurisdictional evolution has been taking place to such extent that the old
8 jurisdictional landmarks have been left far behind so that in many instances
9 states may now properly exercise jurisdiction over nonresidents not amenable
10 to service within their borders. The point has not been reached, however, where
11 state boundaries are not without significance. There must still be some
12 'affiliating' circumstances without which the courts of the state may not
13 entertain jurisdiction. *Hanson v. Denckla*, supra. Each case depends upon its
14 own circumstances, but while we adhere to the generalities of 'minimal
15 contact,' that contact must be of significance. **In this case it must amount to**
16 **owning property or doing business within this state.**

17 *McCulloch Corp. v. O'Donnell*, 83 Nev. 396, 398, 433 P.2d 839, 840 (1967).

18 In this case, Zandian owns property and does business within the forum state. As a
19 result, Zandian's forum activities are so "substantial" or "continuous and systematic" that he
20 may be deemed present in the forum and therefore general jurisdiction is appropriate.

21 In fact, Zandian currently owns real property throughout Nevada. He owns two
22 properties in Clark County.⁴ He owns 10 properties in Washoe County.⁵ He owns and/or is
23 partial owner of 6 properties in Lyon County.⁶ He is part owner of two properties in Churchill
24 County.⁷ He is part owner of one property in Elko County.⁸

25 With regards to doing business within Nevada, Zandian is a manager of 11000 Reno
26 Highway, Fallon, LLC, a Nevada LLC that is in active status.⁹ Currently, 11000 Reno
27 Highway, Fallon, LLC is listed as the owner of 640 acres of real property in Churchill
28 County.¹⁰

29 ⁴ See Zandian's Clark County property information, attached hereto as **Exhibit 4**.

30 ⁵ See Zandian's Washoe County property information, attached hereto as **Exhibit 5**.

31 ⁶ See Zandian's Lyon County property information, attached hereto as **Exhibit 6**.

32 ⁷ See Zandian's Churchill County property information, attached hereto as **Exhibit 7**.

33 ⁸ See Zandian's Elko County property information, attached hereto as **Exhibit 8**.

34 ⁹ See Zandian's manager information for 11000 Reno Highway, Fallon, L.L.C., attached hereto as **Exhibit 9**.

35 ¹⁰ See 11000 Reno Highway, Fallon, LLC's Churchill County property information, attached hereto as **Exhibit 10**.

1 Zandian is a managing member and registered agent of Misfits Development LLC, a
2 Nevada LLC in active status.¹¹ Zandian is a managing member and registered agent of Elko
3 North 5th Avenue, LLC, a Nevada LLC in active status.¹² Zandian is a managing member and
4 registered agent for Stagecoach Valley LLC, an active Nevada LLC.¹³

5 Zandian acted as the resident agent for a revoked Nevada limited liability company
6 named Rock and Royalty LLC where Zandian's resident agent address was 1401 S. Las Vegas
7 Boulevard, Las Vegas, Nevada 89104.¹⁴ Zandian was a managing member of Gold Canyon
8 Development LLC, a Nevada LLC that is now in default status.¹⁵ Zandian was a managing
9 member of High Tech Development LLC, a Nevada LLC that has been dissolved.¹⁶ Zandian
10 was a managing member of Lyon Park Development LLC, a Nevada LLC that has been
11 dissolved.¹⁷ Zandian was a managing member of Churchill Park Development LLC, a Nevada
12 LLC that has been dissolved.¹⁸ Zandian was a manager of Sparks Village LLC, a Nevada LLC
13 that is in default status.¹⁹ Zandian was president, secretary, treasurer, director and resident
14 agent of Optima Technology Corporation, a now revoked Nevada close corporation.²⁰
15 Zandian was a managing member of I-50 Plaza LLC, a Nevada LLC in default status.²¹
16 Zandian was a manager of Dayton Plaza, LLC, a Nevada LLC in default status.²² Finally,
17 Zandian was a manager of Reno Highway Plaza, LLC, a Nevada LLC in revoked status.²³

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19 ¹¹ See Zandian's managing member and resident agent information for Misfits Development LLC, attached hereto
as **Exhibit 11**.

20 ¹² See Zandian's managing member and resident agent information for Elko North 5th Avenue, LLC, attached
hereto as **Exhibit 12**.

21 ¹³ See Zandian's managing member and resident agent information for Stagecoach Valley LLC, attached hereto as
Exhibit 13.

22 ¹⁴ See Zandian's resident agent information for Rock and Royalty LLC, attached hereto as **Exhibit 14**.

23 ¹⁵ See Zandian's managing member information for Gold Canyon Development LLC, attached hereto as **Exhibit**
15.

24 ¹⁶ See Zandian's managing member information for High Tech Development LLC, attached hereto as **Exhibit 16**.

25 ¹⁷ See Zandian's managing member information for Lyon Park Development LLC, attached hereto as **Exhibit 17**.

26 ¹⁸ See Zandian's managing member information for Churchill Park Development LLC, attached hereto as **Exhibit**
18.

27 ¹⁹ See Zandian's manager information for Sparks Village LLC, attached hereto as **Exhibit 19**.

28 ²⁰ See Zandian's information for Optima Technology Corporation, attached hereto as **Exhibit 20**.

²¹ See Zandian's information for I-50 Plaza LLC, attached hereto as **Exhibit 21**.

²² See Zandian's information for Dayton Plaza, LLC, attached hereto as **Exhibit 22**.

²³ See Zandian's information for Reno Highway Plaza, LLC, attached hereto as **Exhibit 23**.

1 Also, Zandian listed Carson City and Las Vegas addresses for his registered agent and
2 officer information for Rock and Royalty LLC, Optima Technology Corporation, High Tech
3 Development LLC, Lyon Park Development LLC, Churchill Park Development LLC, Sparks
4 Village, LLC, I-50 Plaza LLC, Dayton Plaza, LLC, 11000 Reno Highway Fallon LLC, Misfits
5 Development LLC, Elko North 5th Ave, LLC, and Stagecoach Valley LLC.²⁴

6 As demonstrated above, Zandian clearly owns or partially owns 21 properties within
7 and throughout the state of Nevada and Zandian clearly does a significant amount of business
8 within the state. His property ownership holdings and his business dealings, alone, show that
9 Zandian’s forum activities are so “substantial” or “continuous and systematic” that he may be
10 deemed present in the forum and therefore general jurisdiction is appropriate.

11 **C. NEVADA HAS ABROGATED THE DOCTRINE OF SPECIAL/GENERAL**
12 **APPEARANCES**

13 Zandian argues that he is making a special appearance “for the purpose of testing both
14 the sufficiency of service and the jurisdiction of the court; thus, Zandian has not consented to
15 personal jurisdiction of any Nevada court by bringing the instant motion.” *See* Motion to
16 Dismiss on a Special Appearance, dated 6/8/11, 2:12-15, on file herein.

17 However, the Nevada Supreme Court has abrogated the doctrine of special/general
18 appearances. *Hansen v. Eighth Judicial Dist. Court ex rel. County of Clark*, 116 Nev. 650,
19 656, 6 P.3d 982, 985 (2000). “Now, before a defendant files a responsive pleading such as an
20 answer, that defendant may move to dismiss for lack of personal jurisdiction, insufficiency of
21 process, and/or insufficiency of service of process, and such a defense is not ‘waived by being
22 joined with one or more other defenses.’ Alternatively, a defendant may raise its defenses,
23 including those relating to jurisdiction and service, in a responsive pleading.” *Hansen*, 116
24 Nev. at 656, 6 P.3d at 986.

25 Zandian could have raised his alleged defenses of insufficiency of service of process
26 and lack of jurisdiction in a motion to dismiss without waiving such defenses and his “special”
27 appearance is a nullity. Therefore, Zandian’s motion is merely a motion to dismiss. However,

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²⁴ *See* Exhibits 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, and 22, attached hereto.

1 as will be shown above and below, the motion to dismiss is procedurally and factually fatally
2 flawed.

3 **D. ZANDIAN CANNOT MEET THE STANDARD FOR A MOTION TO DISMISS**

4 “In considering ‘a motion to dismiss, all well-pleaded allegations of material fact are
5 taken as true and construed in a light most favorable to the non-moving party.’” *Germaine*
6 *Music v. Universal Songs of Polygram*, 275 F. Supp. 2d 1288, 1294 (D. Nev. 2003) *aff’d in*
7 *part*, 130 F. App’x. 153 (9th Cir. 2005).

8 In his first paper filed with this Court, Zandian moves this Court to set aside the
9 judgment and dismiss the case. Zandian casually makes a short reference to NRCP 55(c) and
10 NRCP 60(b) in a request to set aside the default judgment and then in the same sentence
11 requests that the Court dismiss this case “on the grounds that the court does not enjoy personal
12 jurisdiction over Zandian.” *See* Motion to Dismiss on a Special Appearance, dated 6/8/11,
13 6:9-11, on file herein.

14 However, as shown above, Zandian was properly served and his forum contacts are so
15 substantial as to create general jurisdiction over him in the State of Nevada. Therefore,
16 construing the complaint in the light most favorable to the Plaintiff, Zandian’s motion to
17 dismiss cannot meet the standard for a motion to dismiss.

18 **E. ZANDIAN HAS NOT AND CANNOT MEET THE STANDARD FOR A**
19 **MOTION TO SET ASIDE**

20 If a defaulting party is dissatisfied with a default judgment, then the only procedural
21 remedy is to set aside the default. NRCP 60(b) states the standard for setting aside a default
22 judgment as follows:

23 On motion and upon such terms as are just, the court may relieve a party or a
24 party's legal representative from a final judgment, order, or proceeding for the
25 following reasons: (1) mistake, inadvertence, surprise, or excusable neglect; (2)
26 newly discovered evidence which by due diligence could not have been
27 discovered in time to move for a new trial under Rule 59(b); (3) fraud (whether
28 heretofore denominated intrinsic or extrinsic), misrepresentation or other
misconduct of an adverse party; (4) the judgment is void; or, (5) the judgment
has been satisfied, released, or discharged, or a prior judgment upon which it is
based has been reversed or otherwise vacated, or it is no longer equitable that
an injunction should have prospective application.

1 NRCP 60(b).

2 A district court's exercise of discretion in setting aside a default judgment, **or in**
3 **refusing to do so**, will not be disturbed in the absence of an abuse of discretion. *Hotel Last*
4 *Frontier Corp. v. Frontier Properties, Inc.*, 79 Nev. 150, 154, 380 P.2d 293, 294 (1963). The
5 district court must consider the following factors before granting a motion to set aside:

6 **First**, there must have been "*a prompt application to remove the judgment.*"
7 *Yochum*, 98 Nev. at 486, 653 P.2d at 1216 (citing *Hotel Last Frontier v.*
8 *Frontier Prop.*, 79 Nev. 150, 380 P.2d 293 (1963)) (citations omitted)
9 (emphasis added). **Second**, there must be an "*absence of an intent to delay the*
10 *proceedings.*" *Id.* (Emphasis added.) **Third**, there must be evidence of "*a lack*
11 *of knowledge of procedural requirements*" on the part of the moving party. *Id.*
12 (Emphasis added). **Fourth**, the motion must be made in "*good faith.*" *Id.*
13 (Emphasis added.) **Fifth**, "the moving party must promptly tender a
14 '*meritorious defense*' to the claim for relief." *Yochum*, 98 Nev. at 487, 653 P.2d
15 at 1216-17 (citations omitted) (emphasis added). **Finally**, "the court must give
16 due consideration to the state's underlying *basic policy of resolving cases on*
17 *their merits* whenever possible." *Yochum*, 98 Nev. at 487, 653 P.2d at 1217
18 (emphasis added).

19 *Kahn v. Orme*, 108 Nev. 510, 513, 835 P.2d 790, 792-93 (1992)(emphasis added).

20 The acceptable procedures to satisfy the requirement that a "meritorious defense" be
21 shown are as follows:

22 (1) the fact testimony or affidavit of one possessing testimonial qualifications,
23 which factual information, if true, would tend to establish a defense to all or
24 part of the claim for relief asserted; or (2) the opinion of counsel for a party,
25 based upon facts related to him (without setting forth such facts), that a
26 meritorious defense exists to all or part of the claim for relief asserted; or (3)
27 the tendering of a responsive pleading in good faith, with the moving papers,
28 which responsive pleading, if true, would tend to establish a meritorious
defense to all or part of the claim for relief asserted; or (4) any combination of
the above.

29 *Hotel Last Frontier Corp.*, 79 Nev. at 155, 380 P.2d at 295.

30 In this case, Zandian fails to show that there was prompt application to remove the
31 judgment or an absence of intent to delay the proceedings. There is nothing in Zandian's
32 motion to dismiss on either subject.

33 On the other hand, the facts demonstrate that Zandian and his counsel had notice of the
34 action and the default early on. In fact, on December 2, 2010, a default was entered against

1 Zandian. Plaintiff then filed and served a Notice of Entry of Default on Zandian on December
2 7, 2010 and on his last known attorney on December 16, 2010. On February 25, 2011,
3 Plaintiff filed in this Court and served a certificate of service indicating that the application for
4 entry of default against Zandian was sent to attorney John Peter Lee. On February 28, 2011,
5 Plaintiff filed an application for default judgment against Defendants Zandian, Optima
6 Technology Corporation, a California Corporation, and Optima Technology Corporation, a
7 Nevada Corporation. On March 1, 2011, a default judgment was entered against Zandian and
8 the other defendants for \$121,594.46. On March 7, 2011, notice of entry of that default was
9 filed and served by mail on Zandian and his counsel.

10 Notwithstanding the many notices provided to Zandian and his counsel, Zandian only
11 now seeks to cursorily “set aside” the default judgment. However, Zandian **provides no**
12 **explanation for the delay in responding to the default judgment** and he does not provide
13 any basis upon which to demonstrate an absence of intent to delay the proceedings. Zandian
14 only improperly attacks the action itself on the basis of jurisdiction and insufficiency of
15 service of process.

16 Zandian does not show any evidence of “*a lack of knowledge of procedural*
17 *requirements*” regarding setting aside a default judgment. None. To the contrary, Zandian
18 only points to NRC 60(b) in his request to set aside the default judgment, and he only
19 grounds his request on service of process and jurisdiction. *See Motion to Dismiss, dated*
20 *6/8/11, 6:9-10, on file herein.*

21 Zandian fails to even bring a true motion to set aside and therefore has failed to bring a
22 motion to set aside in good faith. Zandian’s motion is merely a motion to dismiss with a minor
23 reference to the procedural rule for setting aside the default, which constitutes bad faith.

24 Zandian does not proffer any defense, nor does he even indicate that a meritorious
25 defense exists. Zandian fails to provide this Court with any fact testimony or affidavit, which,
26 if true, would tend to establish a defense to all or part of the claims asserted. Zandian fails to
27 provide any opinion of counsel that a meritorious defense exists to all or part of the claims.
28 Zandian did not tender a responsive pleading in good faith, with the moving papers, which

1 responsive pleading, if true, would tend to establish a meritorious defense to all or part of the
2 claims. In short, Zandian has completely failed to show that he has a meritorious defense to
3 any of the claims asserted in the Complaint.

4 As a result of the above facts, Zandian has not and cannot meet the burden necessary to
5 allow this Court to set aside the default judgment.

6 **F. COUNTERMOTION TO STRIKE MOTION TO DISMISS AS ZANDIAN**
7 **PREVIOUSLY WAIVED HIS OBJECTIONS TO PERSONAL JURISDICTION,**
8 **PROCESS, OR SERVICE OF PROCESS**

9 NRCP 12(f) allows motions to strike as follows:

10 Upon motion made by a party before responding to a pleading or, if no
11 responsive pleading is permitted by these rules, upon motion made by a party
12 within 20 days after the service of the pleading upon the party or upon the
13 court's own initiative at any time, the court may order stricken from any
14 pleading any **insufficient defense** or any redundant, immaterial, impertinent, or
15 scandalous matter.

16 NRCP 12(f)(emphasis added).

17 In this case, after a default judgment was entered and noticed, Zandian has now
18 improperly filed a motion to dismiss on the grounds that this Court lacks jurisdiction over
19 Zandian. The motion to dismiss is improper because Zandian waived such defenses by not
20 objecting to insufficiency of service of process or lack of jurisdiction in a timely motion to
21 dismiss or a timely answer: "Objections to personal jurisdiction, process, or service of process
22 are **waived, however, if not made in a timely motion** or not included in a responsive
23 pleading such as an answer. *Hansen v. Eighth Judicial Dist. Court ex rel. County of Clark*,
24 116 Nev. 650, 656, 6 P.3d 982, 986 (2000).²⁵

25 Zandian clearly did not file a timely motion to dismiss or any other timely responsive
26 pleading regarding his objections to personal jurisdiction, process, or service of process.

27 Therefore, Zandian has waived any such defenses. As a result, Plaintiff now respectfully

28 ²⁵ This is consistent with NRCP 12(h)(1), which states as follows: "A defense of lack of jurisdiction over the person, insufficiency of process, or insufficiency of service of process is waived (A) if omitted from a motion in the circumstances described in subdivision (g), or (B) if it is neither made by motion under this rule nor included in a responsive pleading or an amendment thereof permitted by Rule 15(a) to be made as a matter of course."

1 requests that this Court strike Zandian's motion to dismiss based upon the fact that such
2 waived defenses are now an "insufficient defense" to object to this Court's jurisdiction.

3 **G. COUNTERMOTION FOR LEAVE TO AMEND THE COMPLAINT**

4 This countermotion is made and based upon NRCP 15(a) which states that leave to
5 amend a party's pleading "shall be freely given when justice so requires."

6 If the Court is willing to either dismiss or set aside the default judgment, then, and only
7 then, Plaintiff respectfully requests leave to amend the Complaint to properly reference
8 Zandian's actions in the Arizona case and to re-serve Zandian in a manner that Zandian cannot
9 complain of any further.

10 For instance, Plaintiff states in the Complaint that in the Arizona action, "Mr. Margolin
11 and OTG filed a cross-claim for declaratory relief against Zandian in order to obtain legal title
12 to their respective patents." *See* Complaint, ¶ 17. While Zandian effectively represents to this
13 Court that he was not involved in the Arizona action, it is absolutely true that Zandian signed
14 the fraudulent patent assignments on behalf of Optima Technology Corporation, which
15 fraudulent assignments led to the instant action. It is by and through the fraudulent actions of
16 one individual, Zandian, which created the Arizona action and the instant action. However,
17 Plaintiff recognizes that Optima Technology Corporation was the entity behind which Zandian
18 hid in the Arizona action. Plaintiff is willing to amend the Complaint to so allege.

19 In addition, if the Court finds there is insufficiency of service of process, then Plaintiff
20 respectfully requests this Court's assistance in obtaining a current address from Zandian or his
21 counsel as to where Zandian can be "properly" served with a summons and complaint. Again,
22 Plaintiff would be more than willing to re-allege in an amended complaint the current
23 residence of Zandian, wherever that may be.

24 However, Plaintiff vehemently rejects any notion that Plaintiff fraudulently alleged the
25 residence of Zandian in the original Complaint or any other fact in the Complaint. The
26 attached property records and business records show that Zandian has represented to the
27 subject counties and state of Nevada that his addresses were in both Nevada and California.

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AFFIRMATION PURSUANT TO NRS 239B.030

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

Dated this 22nd day of June, 2011.

BY: 

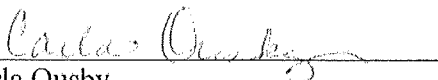
Matthew D. Francis (6978)
Adam P. McMillen (10678)
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171
Attorneys for Plaintiff Jed Margolin

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, **OPPOSITION TO MOTION TO DISMISS**
5 **AND COUNTERMOTIONS TO STRIKE AND FOR LEAVE TO AMEND THE**
6 **COMPLAINT**, addressed as follows:

7
8 John Peter Lee
9 John Peter Lee, Ltd.
10 830 Las Vegas Blvd. South
11 Las Vegas, NV 89101

12 Dated: June 22, 2011

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Carla Ousby

INDEX OF EXHIBITS

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Exhibit No.	Title	Number of Pages
1	Fraudulent assignment documents	17
2	Affidavit of Service, dated 2/18/2010	4
3	Letter dated 1/8/2010	12
4	Zandian's Clark County property information	2
5	Zandian's Washoe County property information	8
6	Zandian's Lyon County property information	10
7	Zandian's Churchill County property information	2
8	Zandian's Elko County property information	1
9	Zandian's manager information for 11000 Reno Highway, Fallon, LLC	2
10	11000 Reno Highway, Fallon, LLC's Churchill County property information	1
11	Zandian's managing member and resident agent information for Misfits Development LLC	2
12	Zandian's managing member and resident agent information for Elko North 5 th Avenue, LLC	2
13	Zandian's managing member and resident agent information for Stagecoach Valley LLC	2
14	Zandian's resident agent information for Rock and Royalty LLC	2
15	Zandian's managing member information for Gold Canyon Development LLC	2
16	Zandian's managing member information for High Tech Development LLC	2
17	Zandian's managing member information for Lyon Park Development LLC	2
18	Zandian's managing member information for Churchill Park Development LLC	2
19	Zandian's manager information for Sparks Village LLC	2
20	Zandian's information for Optima Technology Corporation	2
21	Zandian's information for I-50 Plaza LLC	2
22	Zandian's information for Dayton Plaza, LLC	2
23	Zandian's information for Reno Highway Plaza, LLC	2

Exhibit 1

Exhibit 1



UNITED STATES PATENT AND TRADEMARK OFFICE

UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

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700352576A

DECEMBER 10, 2007

PTAS

OPTIMA TECHNOLOGY CORPORATION (NV)
C/O JOHN PETER LEE LIMITED
830 LAS VEGAS BOULEVARD SOUTH
LAS VEGAS, NEVADA 89101

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RECORDATION DATE: 12/05/2007

REEL/FRAME: 020218/0085

NUMBER OF PAGES: 4

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

ASSIGNOR:

MARGOLIN, JED

DOC DATE: 12/05/2007

ASSIGNEE:

OPTIMA TECHNOLOGY CORPORATION (NV)
830 LAS VEGAS BOULEVARD SOUTH
C/O JOHN PETER LEE LIMITED
LAS VEGAS, NEVADA 89101

SERIAL NUMBER: 08513298

FILING DATE: 08/09/1995

PATENT NUMBER: 5566073

ISSUE DATE: 10/15/1996

TITLE: PILOT AID USING SYNTHETIC REALITY

SERIAL NUMBER: 08587731

FILING DATE: 01/19/1996

PATENT NUMBER: 5904724

ISSUE DATE: 05/18/1999

TITLE: METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT

020218/0085 PAGE 2

SERIAL NUMBER: 09543252 FILING DATE: 04/05/2000
PATENT NUMBER: 6377436 ISSUE DATE: 04/23/2002
TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045 FILING DATE: 09/03/1998
PATENT NUMBER: 5978488 ISSUE DATE: 11/02/1999
TITLE: SIMULATED AM RADIO

THERESA FREDERICK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

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12/05/2007
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858-625-2460

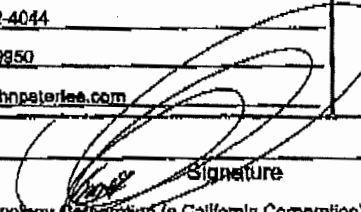
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Form PTO-1595 (Rev. 07/05)
OMB No. 0651-0027 (exp. 6/30/2008)

U.S. DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

**RECORDATION FORM COVER SHEET
PATENTS ONLY**

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents or the new address(es) below.

1. Name of conveying party(ies) Jed Margolin based on Power of Attorney dated July 20, 2004 to: Optima Technology Corporation (CA) Additional name(s) of conveying party(ies) attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		2. Name and address of receiving party(ies) Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Country: <u>U.S.A.</u> - Zip: <u>89101</u> Additional name(s) & address(es) attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3. Nature of conveyance/Execution Date(s): Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other		4. Application or patent number(s): <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s) B. Patent No.(s) <u>6,566,073</u> <u>5,804,724</u> <u>6,377,438</u> <u>5,978,488</u> Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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9. Signature:  Signature Optima Technology Corporation (a California Corporation) Name of Person Signing		8. Payment Information a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u> b. Deposit Account Number _____ Authorized User Name _____	
		Total number of pages including cover sheet, attachments, and documents: 7	

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UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

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DECEMBER 10, 2007

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OPTIMA TECHNOLOGY COPORATION (NV)
C/O JOHN PETER LEE LIMITED
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LAS VEGAS, NEVADA 89101

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RECORDATION DATE: 12/05/2007

REEL/FRAME: 020218/0089
NUMBER OF PAGES: 5

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

ASSIGNOR:

MARGOLIN, JED BASED ON POWER OF
ATTORNEY DATED JULY 20, 2004 TO:
OPTIMA TECHNOLOGY CORPORATION
(CA)

DOC DATE: 12/05/2007

ASSIGNEE:

OPTIMA TECHNOLOGY CORPORATION (NV)
830 LAS VEGAS BOULEVARD SOUTH
C/O JOHN PETER LEE LIMITED
LAS VEGAS, NEVADA 89101

SERIAL NUMBER: 08513298

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SERIAL NUMBER: 09148045 FILING DATE: 09/03/1998
PATENT NUMBER: 5978488 ISSUE DATE: 11/02/1999
TITLE: SIMULATED AM RADIO

THERESA FREDERICK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

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12/05/2007
700352578

858-625-2460

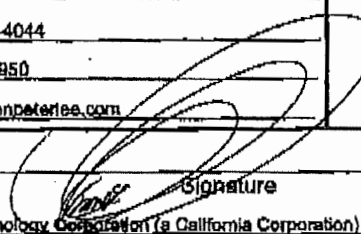
P. 1

Form PYO-1595 (Rev. 07/05)
OMB No. 0851-0027 (exp. 6/30/2008)

U.S. DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

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3. Nature of conveyance/Execution Date(s): Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other		4. Application or patent number(s): <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s) B. Patent No.(s) <u>5,866,073</u> <u>5,904,724</u> <u>5,377,438</u> <u>5,978,488</u> Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Name and address to whom correspondence concerning document should be mailed: Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Zip: <u>89101</u> Phone Number: <u>702-382-4044</u> Fax Number: <u>702-383-9950</u> Email Address: <u>info@johnpeterlee.com</u>		6. Total number of applications and patents involved: <u>4</u> 7. Total fee (37 CFR 1.21(h) & 3.41) \$160.00 <input checked="" type="checkbox"/> Authorized to be charged by credit card <input type="checkbox"/> Authorized to be charged to deposit account <input type="checkbox"/> Enclosed <input type="checkbox"/> None required (government interest not affecting title)	
9. Signature:  Signature <u>Optima Technology Corporation (a California Corporation)</u> Name of Person Signing		8. Payment Information a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u> b. Deposit Account Number _____ Authorized User Name _____ Total number of pages including cover sheet, attachments, and documents: <u>7</u>	

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020227/0287 PAGE 2

SERIAL NUMBER: 09543252

FILING DATE: 04/05/2000

PATENT NUMBER: 6377436

ISSUE DATE: 04/23/2002

TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045

FILING DATE: 09/03/1998

PATENT NUMBER: 5978488

ISSUE DATE: 11/02/1999

TITLE: SIMULATED AM RADIO

MARCUS KIRK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

020227/0287 PAGE 2

SERIAL NUMBER: 09543252 FILING DATE: 04/05/2000
PATENT NUMBER: 6377436 ISSUE DATE: 04/23/2002
TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045 FILING DATE: 09/03/1998
PATENT NUMBER: 5978488 ISSUE DATE: 11/02/1999
TITLE: SIMULATED AM RADIO

MARCUS KIRK, EXAMINER
ASSIGNMENT SERVICES BRANCH
PUBLIC RECORDS DIVISION

Form PTO-1595 (Rev. 07/05)
OMB No. 0951-0027 (exp. 6/30/2008)

U.S. DEPARTMENT OF COMMERCE
United States Patent and Trademark Office

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PATENTS ONLY

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Additional name(s) of conveying party(ies) attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Street Address: <u>830 Las Vegas Boulevard South</u>	
3. Nature of conveyance/Execution Date(s): Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other		City: <u>Las Vegas</u> State: <u>Nevada</u> Country: <u>U.S.A.</u> Zip: <u>89101</u>	
4. Application or patent number(s): <input type="checkbox"/> This document is being filed together with a new application.		Additional name(s) & address(es) attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
A. Patent Application No.(s)		B. Patent No.(s) <u>5,588,073</u> <u>5,904,724</u> <u>6,377,436</u> <u>5,978,480</u>	
Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
5. Name and address to whom correspondence concerning document should be mailed: Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u> Street Address: <u>830 Las Vegas Boulevard South</u> City: <u>Las Vegas</u> State: <u>Nevada</u> Zip: <u>89101</u> Phone Number: <u>702-382-4044</u> Fax Number: <u>702-383-9950</u> Email Address: <u>info@johnpeterlee.com</u>		6. Total number of applications and patents involved: <u>4</u>	
		7. Total fee (37 CFR 1.21(h) & 3.41) \$ <u>160.00</u> <input checked="" type="checkbox"/> Authorized to be charged by credit card <input type="checkbox"/> Authorized to be charged to deposit account <input type="checkbox"/> Enclosed <input type="checkbox"/> None required (government interest not affecting title)	
		8. Payment Information a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u> b. Deposit Account Number _____ Authorized User Name _____	
9. Signature: <u>Jed Margolin</u> by <u>[Signature]</u> Signature <u>his Attorney in Fact</u> Date <u>12/5/2007</u>		Total number of pages including cover sheet, attachments, and documents: <u>7</u>	
Optima Technology Corporation (a California Corporation) Name of Person Signing			

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Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1480, Alexandria, V.A. 22313-1480

OP \$160.00 5566073

Dec 05 07 01:52p nikan

858-625-2460

p. 4

Optima Technology Corporation

8775 Costa Verde Blvd.
Suite 501, San Diego CA 92122
Phone: 775-450-6833
Fax: 858-625-2460

December 5, 2007

United States Patent Office
Patent Assignment Department

Fax: 571-273-0140

Subject: Assignment of Patents

Dear Sir,

Reference to our telephone conversation of today with Mr. Maurice please find herewith the information cover sheet and credit card payment form and the power of attorney from Mr. Jed Margolin to Optima Technology Corporation for four patents Numbers:

5,566,073
5,904,724
6,377,436
5,978,488

to be assigned to Optima Technology Corporation a Nevada Corporation with the Address:

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

Thank you In advance for your co-operation, please call 775-450-6833 if you have any question.

Truly Yours

Reza Zandian
Director/Officer Optima Technology Corporation



Exhibit 2

Exhibit 2

COPY

No. 090C00579 LB

Dept. I

REC'D & FILED
2010 MAR -9 PM 2:15
ALAN GLOVER
BY J. HANICLEROAD
DEPUTY

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

SUMMONS

JED MARGOLIN, an individual
Plaintiff,

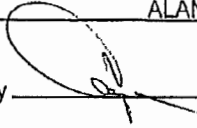
^{VS}
Optima Technology Corporation, a California corporation,
Optima Technology Corporation, a Nevada corporation, Reza
Zandian aka Golamreza Zandianjazi aka Gholam Reza Zandian
aka Reza Jazi aka J. Reza ~~Defendant~~, Jazi aka G. Reza Jazi
aka Chononreza Zandian Jazi, an individual, DOE Companies
1-10, 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.
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 
Deputy Clerk

Date December 15, 2009, 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 SERVICE
(For General Use)

STATE OF CALIFORNIA }
COUNTY OF SACRAMENTO } SS.

ROBERT TOTH, declares under penalty of perjury:
That affiant is, and was on the day when he served the within Summons, over 18 years of age, and not a party to, nor interested in, the within action; that the affiant received the Summons on the 22ND day of JANUARY, 20 10, and personally served the same upon REZA ZANDIAN the within named defendant, on the 2ND day of FEBRUARY, 20 10, by delivering to the said defendant, personally, in FAIR OAKS, County of SACRAMENTO, State of CALIFORNIA, a copy of the Summons attached to a copy of the Complaint.

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

Executed this 12TH day of FEBRUARY, 20 10. Robert Toth
Signature of person making service

STATE OF NEVADA }
CARSON CITY } SS.

NEVADA SHERIFF'S RETURN
(For Use of Sheriff of Carson City)

I hereby certify and return that I received the within Summons on the _____ day of _____, 20 ____; and personally served the same upon _____, the within named defendant, on the _____ day of _____, 20 ____, by delivering to the said defendant, personally, in Carson City, State of Nevada, a copy of the Summons attached to a copy of the Complaint.

Sheriff of Carson City, Nevada

Date: _____, 20 ____ By _____ Deputy

STATE OF NEVADA }
COUNTY OF _____ } SS.

AFFIDAVIT OF MAILING
(For Use When Service is by Publication and Mailing)

_____, declares under penalty of perjury:
That affiant is, and was when the herein described mailing took place, over 18 years of age, and not a party to, nor interested in, the within action; that on the _____ day of _____, 20 ____, affiant deposited in the Post Office at _____, Nevada, a copy of the within Summons attached to a copy of the Complaint, enclosed in a sealed envelope upon which first class postage was fully prepaid, addressed to _____, the within named defendant, at _____;

that there is a regular communication by mail between the place of mailing and the place so addressed.

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

Executed this _____ day of _____, 20 ____.

NOTE - 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

1 Jed Margolin v. Optima Technology Corp., et al.
Case No. 090C00579 1B
2 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 Ghononreza 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.

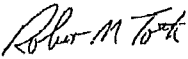
14 On January 31, 2010 at 4:13 p.m., I went the residence address, and again there was no
15 answer at the door.

16 On February 2, 2010 at 5:37 p.m., when I returned to the residence address, I observed no
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.



ROBERT M. TOTH
Registered Process Server

Exhibit 3

Exhibit 3



January 8, 2010

KELLY G. WATSON ¹
MICHAEL D. ROUNDS ¹
MATTHEW D. FRANCIS ²

ARTHUR A. ZORIO ¹
CASSANDRA P. JOSEPH ¹
MELISSA P. BARNARD
RYAN E. JOHNSON
TARA A. SHIROFF
MATTHEW G. HOLLAND
ADAM P. McMILLEN ²
ELIZA BECHTOLD ¹
ADAM YOWELL

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

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

5371 Kietzke Lane
Reno, Nevada 89511
(775) 324-4100
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777 North Rainbow Boulevard
Suite 350
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One Market-Steuart Tower
Suite 1600
San Francisco, CA 94105
(415)243-4090
Fax (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 Ghononreza 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

JM_FJD_0230



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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Cassandra P. Joseph".

Cassandra P. Joseph
WATSON ROUNDS
A Professional Corporation

COPY

Case No.: 09 DC 00579 1B

Dept. No.: I

REC'D & FILED

2009 DEC 11 PM 4:07

BY MARGLOVER CLERK
DEPUTY

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 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 GHONONREZA ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,

Defendants.

COMPLAINT

(Exemption From Arbitration Requested)

Plaintiff, JED MARGOLIN ("Mr. Margolin"), by and through his counsel of record, WATSON ROUNDS, and for his Complaint against Defendants, hereby alleges and complains as follows:

The Parties

1. Plaintiff Mr. Margolin is an individual residing in Storey County, Nevada.
2. On information and belief, Defendant Optima Technology Corporation is a

1 California corporation with its principal place of business in Irvine, California.

2 3. On information and belief, Defendant Optima Technology Corporation is a
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 5. On information and belief, Defendant Optima Technology Corporation, the
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 relevant times served as officers of the OTC—California and OTC—Nevada.
12

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 their direction. Mr. Margolin will amend his Complaint when such additional persons acting in
20 concert or cooperation are ascertained.
21

22 Jurisdiction and Venue

23
24 7. Pursuant to the Nevada Constitution, Article 6, Section 6, the district courts of the
25 State of Nevada have original jurisdiction in all cases excluded by law from the original
26 jurisdiction of the justice courts. This case involves tort claims in an amount in excess of the
27 jurisdictional limitation of the justice courts and, accordingly, jurisdiction is proper in the district
28 court.

1 8. 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.

4 Facts

5 9. Plaintiff Mr. Margolin is the named inventor on numerous patents and patent
6 applications, including United States Patent No. 5,566,073 (“the ‘073 Patent”), United States
7 Patent No. 5,904,724 (“the ‘724 Patent”), United States Patent No. 5,978,488 (“the ‘488 Patent”) and
8 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 Mr. Margolin royalties based on OTG’s licensing of the ‘073 and ‘724 Patents.
15

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

22 14. In about November 2007, OTG licensed the ‘073 Patent to Honeywell
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

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

5 17. Soon thereafter, Mr. Margolin and OTG were named as defendants in an action
6 for declaratory relief regarding non-infringement of the '073 and '724 Patents in the United
7 States District Court for the District of Arizona, in a case titled: *Universal Avionics Systems*
8 *Corporation v. Optima Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the "Arizona
9 Action"). In the Arizona Action, Mr. Margolin and OTG filed a cross-claim for declaratory
10 relief against Zandian in order to obtain legal title to their respective patents.
11

12 18. On August 18, 2008, the United States District Court for the District of Arizona
13 entered a final judgment in favor of Mr. Margolin and OTG on their declaratory relief action, and
14 ordered that OTC had no interest in the '073 or '724 Patents, and that the assignment documents
15 filed with the USPTO were "forged, invalid, void, of no force and effect." Attached as Exhibit A
16 is a copy of the Order from the United States District Court in the Arizona Action.
17

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.

23 Claim 1--Conversion
24 (Against All Defendants)

25 21. Paragraphs 1-20 of the Complaint set forth above are incorporated herein by
26 reference.

27 22. Through the fraudulent acts described above, Defendants wrongfully exerted
28 dominion over the Patents, thereby depriving Mr. Margolin of the use of such property.

1 23. The Patents and the royalties due Mr. Margolin under the Patents were the
2 personal property of Mr. Margolin.

3 24. As a direct and proximate result of the Defendants' conversion, Mr. Margolin has
4 suffered damages in excess of ten thousand dollars (\$10,000), entitling him to the relief set forth
5 below.

6 **Claim 2--Tortious 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 royalties based 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 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 interfered 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 **Claim 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 the Patents.

27 33. Defendants purposely, willfully and improperly attempted to induce Mr.
28 Margolin's prospective licensees to refrain from engaging in business with Mr. Margolin.

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
6 relief set forth below.

7
8 **Claim 4—Unjust Enrichment**
(Against All Defendants)

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
19 **Claim 5—Unfair and Deceptive Trade Practices**
(Against All Defendants)

20 41. 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 trade 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.
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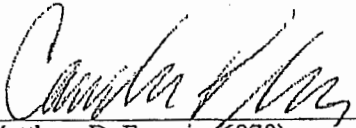
WHEREFORE, Plaintiff Jed Margolin, prays for judgment against the Defendants as follows:

1. That Plaintiff be awarded damages for Defendants' tortious conduct;
2. That Plaintiff be awarded damages for Defendants' unjust enrichment;
3. That Plaintiff be awarded damages for Defendants' commission of unfair and deceptive trade practices, in an amount to be proven at trial, with said damages being trebled pursuant to NRS 598.0999;
4. That Plaintiff be awarded actual, consequential, future, and punitive damages of whatever type or nature;
5. That the Court award all such further relief that it deems just and proper.

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document, filed in District Court, does not contain the social security number of any person.

DATED: December 10, 2009

WATSON ROUNDS

Matthew D. Francis (6978)
Cassandra P. Joseph (9845)
WATSON ROUNDS
5371 Kietzke Lane
Reno, NV 89511
Telephone: 775-324-4100
Facsimile: 775-333-8171

Attorneys for Plaintiff Jed Margolin

Exhibit 1

Exhibit 1

1
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3
4 IN THE UNITED STATES DISTRICT COURT
5 FOR THE DISTRICT OF ARIZONA
6

7 UNIVERSAL AVIONICS SYSTEMS)
CORPORATION,

8 Plaintiff,
9

10 vs.

11 OPTIMA TECHNOLOGY GROUP, INC.,
12 OPTIMA TECHNOLOGY
CORPORATION, ROBERT ADAMS and
13 JED MARGOLIN,

14 Defendants.
15

16 OPTIMA TECHNOLOGY INC. a/k/a
OPTIMA TECHNOLOGY GROUP, INC.,
a corporation,

17 Counterclaimant,
18

18 vs.

19 UNIVERSAL AVIONICS SYSTEMS)
CORPORATION, an Arizona corporation,

20 Counterdefendant,
21

22 OPTIMA TECHNOLOGY INC. a/k/a
OPTIMA TECHNOLOGY GROUP, INC.,

23 Cross-Claimant,
24

25 vs.

26 OPTIMA TECHNOLOGY
CORPORATION,

27 Cross-Defendant.
28

No. CV 07-588-TUC-RCC

ORDER

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

4 Therefore, IT IS HEREBY ORDERED:

5 Final Judgment is entered against Cross-Defendants Optima Technology Corporation,
6 a California corporation, and Optima Technology Corporation, a Nevada corporation, as
7 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");

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

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

15 4. OTC is hereby enjoined from asserting further rights or interests in the Patents
16 and/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).

19 DATED this 18th day of August, 2008.

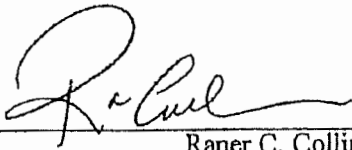
20
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23 _____
24 Raner C. Collins
25 United States District Judge
26
27
28

Exhibit 4

Exhibit 4

GENERAL INFORMATION	
PARCEL NO.	071-02-000-005
OWNER AND MAILING ADDRESS	ZANDIAN REZA 8775 COSTA VERDE #501 SAN DIEGO CA 92122-5343
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	MOAPA VALLEY
ASSESSOR DESCRIPTION	PT NE4 NE4 SEC 02 16 68 SEC 02 TWP 16 RNG 68
RECORDED DOCUMENT NO.	* 20050419:04639
RECORDED DATE	04/19/2005
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	826
APPRAISAL YEAR	2010
FISCAL YEAR	10-11
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2010-11	2011-12
LAND	7000	5250
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	7000	5250
TAXABLE LAND+IMP (SUBTOTAL)	20000	15000
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	7000	5250
TOTAL TAXABLE VALUE	20000	15000

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	10.00 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	24000 04/05
LAND USE	0-00 VACANT
DWELLING UNITS	0

GENERAL INFORMATION	
PARCEL NO.	071-02-000-013
OWNER AND MAILING ADDRESS	ZANDIAN REZA 8775 COSTA VERDE #501 SAN DIEGO CA 92122-5343
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	MOAPA VALLEY
ASSESSOR DESCRIPTION	PT SE4 NE4 SEC 02 16 68 SEC 02 TWP 16 RNG 68
RECORDED DOCUMENT NO.	* 20050420:00563
RECORDED DATE	04/20/2005
VESTING	NO STATUS

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	826
APPRAISAL YEAR	2010
FISCAL YEAR	10-11
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2010-11	2011-12
LAND	14000	10500
IMPROVEMENTS	0	0
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	14000	10500
TAXABLE LAND+IMP (SUBTOTAL)	40000	30000
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	14000	10500
TOTAL TAXABLE VALUE	40000	30000

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	20.00 Acres
ORIGINAL CONST. YEAR	0
LAST SALE PRICE MONTH/YEAR	40000 04/05
LAND USE	0-00 VACANT
DWELLING UNITS	0

Exhibit 5

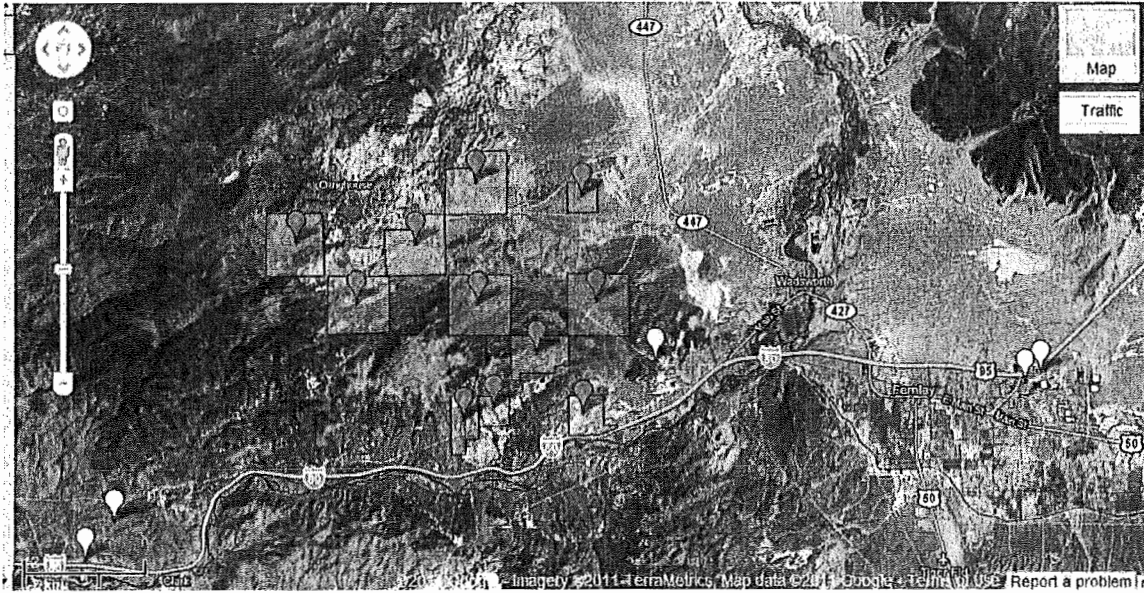
Exhibit 5

Zandian's Washoe County Properties - Jed Margolin 4/17/2011

From Washoe County Web site - Assessor's Database: <http://www.co.washoe.nv.us/assessor/cama/search.php>
 (from a search for "Zandian") April 14, 2011 by Jed Margolin

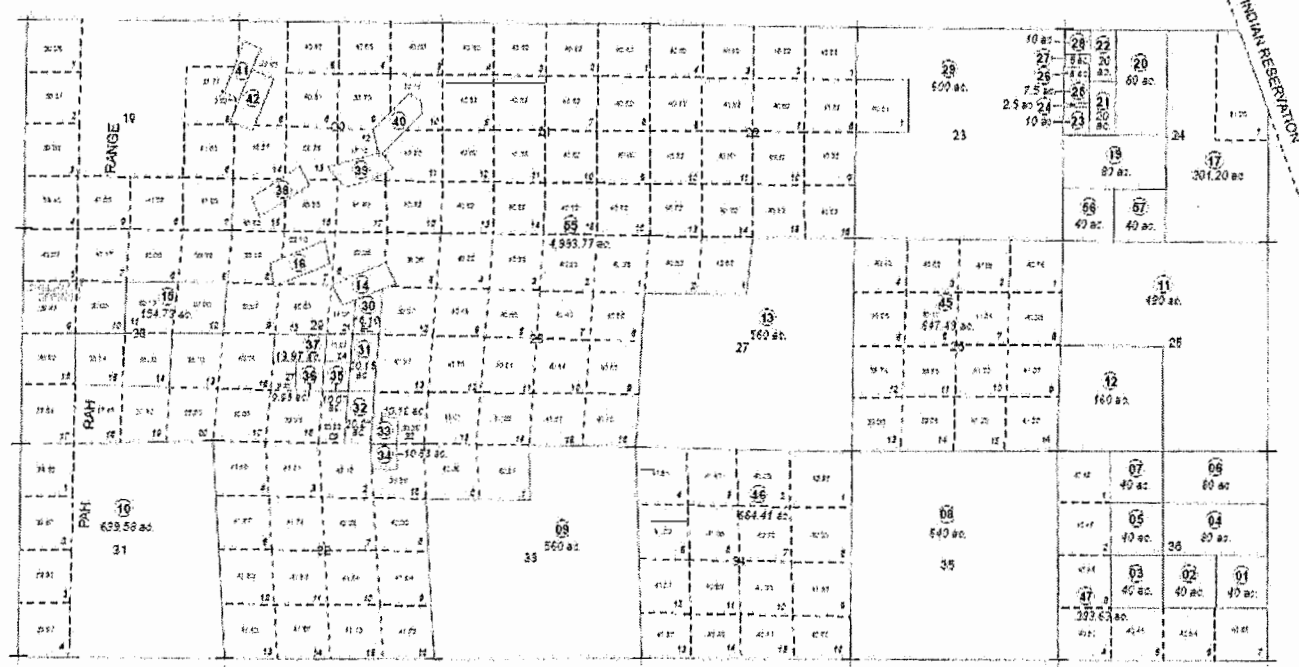
APN	Card	Situs		Last Transaction Date
Owner Name		Mailing Address		
079-150-12	1	STATE ROUTE 447		
REZA ZANDIAN		PO BOX 927674	SAN DIEGO CA 92192	06/27/2005
079-150-09	1	STATE ROUTE 447		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
079-150-10	1	STATE ROUTE 447		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
079-150-13	1	STATE ROUTE 447		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
084-040-02	1	PIERSON CANYON RD		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
084-040-04	1	E INTERSTATE 80		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
084-040-06	1	E INTERSTATE 80		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
084-040-10	1	E INTERSTATE 80		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
084-130-07	1	E INTERSTATE 80		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009
084-140-17	1	E INTERSTATE 80		
REZA ZANDIAN		PO BOX 81624	LAS VEGAS NV 89180	05/12/2009

The properties are North of Interstate 80 and East of SR 447. From Google Maps via Zandian's Web site at www.goldennevada.com. The remaining information is from Washoe County Web site - Assessor's Database.



- PATENTED MINING CLAIMS**
- | | | |
|--|------------------------------|---|
| 078-155-14 PAT. NO. 522150 LOT 20 | 078-155-14 1581 - CASH NO. 2 | 078-150-32 PAT. NO. 522150 LOT 28 GUNDA EVENING |
| 078-150-19 0745 - NO. 2 ANNE | | 078-150-37 PAT. NO. 522150 LOT 29 GOLDEN PLEGE |
| 078-150-30 PAT. NO. 522150 LOT 22 CLIPPER MINE | | 078-150-33 2328 STANDARD |
| 078-150-31 PAT. NO. 522150 LOT 21 WILLIAMS GRAVEL | | 078-150-39 2376 BLACK HORSE |
| 078-150-32 PAT. NO. 522150 LOT 20 GULCH GRAVEL NO. 1 | | 078-150-43 2376 HOLLOW |
| 078-150-33 PAT. NO. 522150 LOT 31 GULCH GRAVEL NO. 2 | | 078-150-41 2551 ALICE |
| 078-150-34 PAT. NO. 522150 LOT 17 GULCH GRAVEL NO. 3 | | 078-150-42 2551 MATTIE |
| 078-150-35 PAT. NO. 522150 LOT 23 GUNDA EVENING | | |

SOUTH 1/2 OF TOWNSHIP 21 NORTH - RANGE 23 EAST



079-150-12 1 STATE ROUTE 447
RESA ZANDIAN PO BOX 927674 SAN DIEGO CA 92192 06/27/2005

160 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => **Ownership**

APN 079-150-12

Owner or Trustee	% Ownership
ZANDIAN, RESA et al	
FOUGHANI, NILOOFAR	

079-150-09 1 STATE ROUTE 447
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

560 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => **Ownership**

APN 079-150-09

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MANAGEMENT TRST, TRST	33
KOROGHLI, TRUSTEE, RAY TTEE	
KOROGHLI, TRUSTEE, SATHSOWI T TTEE	

079-150-10 1 STATE ROUTE 447
 REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

639 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => **Ownership**

APN 079-150-10

Owner or Trustee	% Ownership
------------------	-------------

SADRI LIVING TRUST TTEE et al	
-------------------------------	--

SADRI, TRUSTEE, FRED	33
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ZANDIAN , REZA	33
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KOROGHLI MANAGEMENT TRUST, TRST	33
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KOROGHLI, TRUSTEES, RAY TTEE	
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KOROGHLI, TRUSTEE, SATHSOWI T TTEE	
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079-150-13 1 STATE ROUTE 447
 REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

560 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => **Ownership**

APN 079-150-13

Owner or Trustee	% Ownership
------------------	-------------

SADRI LIVING TRUST TTEE et al	
-------------------------------	--

SADRI, TRUSTEE, FRED	33
----------------------	----

ZANDIAN , REZA	33
----------------	----

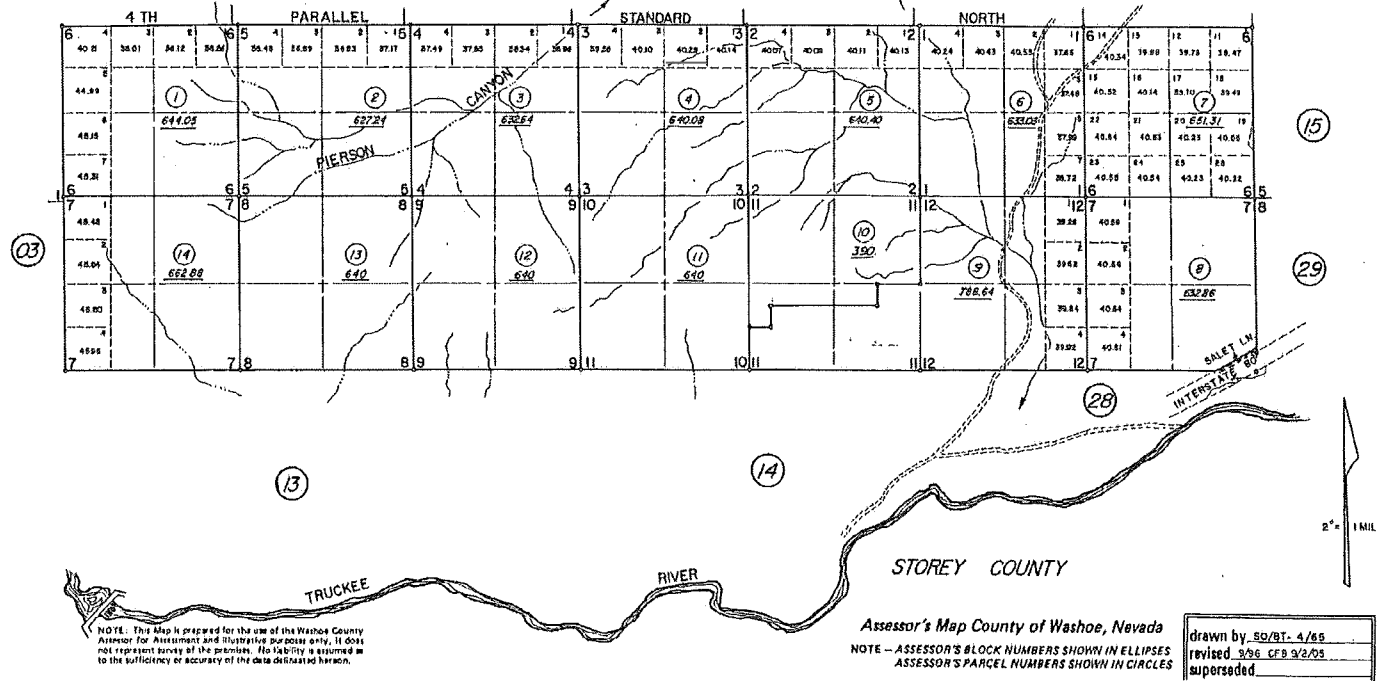
KOROGHLI MGMT TRUST, TRST	33
---------------------------	----

KOROGHLI, TTEE, RAY TTEE	
--------------------------	--

KOROGHLI, TTEE, SATHSOWI T TTEE	
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PORTION OF N² - T.20N.-R.23E.
SECTIONS 6 & 7 - T.20N.-R.24E.

BOOK 79



084-040-02 1 PIERSON CANYON RD
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

627 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 084-040-02

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN, REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-040-04 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

640 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 084-040-04

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN , REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-040-06 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

633 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 084-040-06

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN , REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T	

084-040-10 1 E INTERSTATE 80
 REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

390 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) =>
Ownership

APN 084-040-10

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN , REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-130-07 1 E INTERSTATE 80
 REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

275 acres

[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) =>
Ownership

APN 084-130-07

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN , REZA	33
KOROGHLI MGMT TRUST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

084-140-17 1 E INTERSTATE 80
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

160 acres

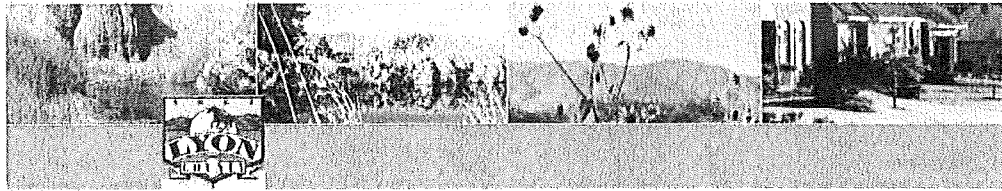
[County Home](#) => [Assessor's Office](#) => [Property Assessment Data Search](#) => [Parcel Search](#) => [Ownership](#)

APN 084-140-17

Owner or Trustee	% Ownership
SADRI LIVING TRUST TTEE et al	
SADRI, TRUSTEE, FRED	33
ZANDIAN , REZA	33
KOROGHLI MGMT TRST, TRST	33
KOROGHLI, TTEE, RAY TTEE	
KOROGHLI, TTEE, SATHSOWI T TTEE	

Exhibit 6

Exhibit 6



[Assessor Home](#)

[Assessor Inquiry](#)

Real Property Inquiry

Search for Real Property (Land, Improvements, etc.)

Order List By:

- Parcel #
- Owner Name
- Property Location
- District

Filters: Limit Selected Parcels to Include (Choose any number):

Parcel # - 8-digit #(s), no dashes Partial Owner Name

Land Use Code Range - Code Table examples: SMITH M / ACME MARKETS

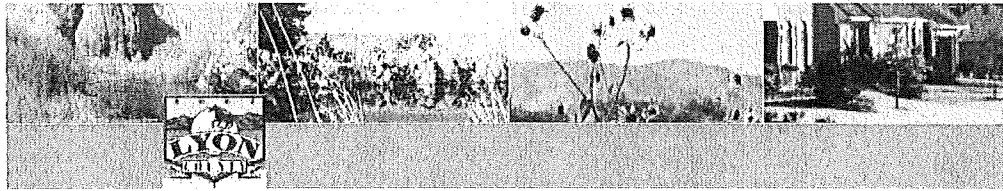
Acreage Range - Partial Property Location

Net Value Range - examples: N MAIN ST / MAPLE DR

District

Search Results - Select for Detail

Parcel #	Owner Name	Property Location	Dist.	Land Use	Acreage	Net Assessed Value
006-052-04	ZANDIAN, REZA	125 PIKE ST	8.5	140 - Vacant Commercial	.220	15,560
006-052-05	ZANDIAN, REZA	115 PIKE ST	8.5	140 - Vacant Commercial	.220	15,560
006-052-06	ZANDIAN, REZA	105 PIKE ST	8.5	140 - Vacant Commercial	.220	15,560
016-311-18	ZANDIAN, REZA ET AL	HWY 50	8.3	120 - Vacant Single Family	241.790	24,500
015-311-19	ZANDIAN, REZA ET AL	HWY 50	8.3	140 - Vacant Commercial	47.750	16,710
021-451-22	ZANDIAN, REZA ET AL		6.0	120 - Vacant Single Family	40.000	3,360



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[Sales Data](#)

[Secured Tax Inquiry](#)

[Recorder Search](#)

Parcel Detail for Parcel # 006-052-04

Location	
Property Location	125 PIKE ST
Town	DAYTON
Subdivision	DAYTON TOWN Lot 4 Block 6
Property Name	
Remarks	

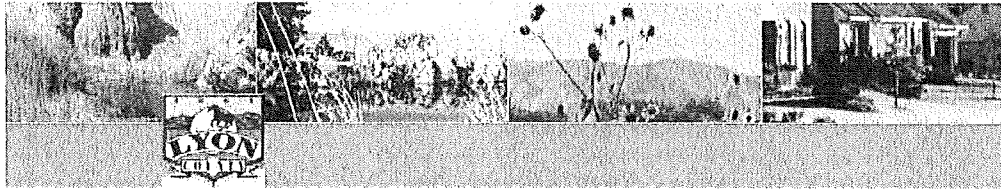
Ownership	
Assessed Owner Name	ZANDIAN, REZA
Mailing Address	P O BOX 927674 SAN DIEGO, CA 92192-7674
Legal Owner Name	ZANDIAN, REZA
Vesting Doc#, Date	342193 02/04/05 Book/Page /
Map Document #s	RS90448

Description		
Total Acres	.220	Ag Acres .000 W/R Acres .000
<u>Improvements</u>		
Single-fam Detached	0	Non-dwell Units 0 Bdrm/Bath 0/.00
Single-fam Attached	0	MH Hookups 0 Stories .0
Multi-fam Units	0	Wells 0
Mobile Homes	0	Septic Tanks 0
Total Dwelling Units	0	Bldg Sq Ft 0
		Garage Sq Ft 0 Atch/Detch
		Basement Sq Ft 0 Finished 0

Appraisal Classifications	
Current Land Use Code	140
Zoning	C1
Re-appraisal Group	5
Orig Constr Year	
Re-appraisal Year	2008
Weighted Year	

Assessed Valuation			
Assessed Values	2012-13	2011-12	2010-11
Land	15,560	15,560	15,560
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	15,560	15,560	15,560
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	44,457	44,457	44,457
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	44,457	44,457	44,457
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



[Assessor Home](#) [Back to Search List](#)

[Personal Property](#) [Sales Data](#) [Secured Tax Inquiry](#) [Recorder Search](#)

Parcel Detail for Parcel # 006-052-05

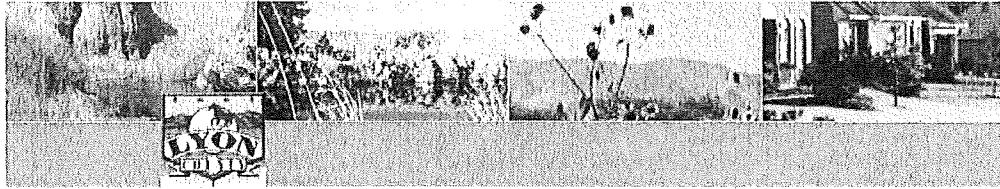
Location	Ownership
Property Location 115 PIKE ST Town DAYTON Subdivision DAYTON TOWN Lot 5 Block 6 Property Name Remarks	Assessed Owner Name ZANDIAN, REZA Mailing Address P O BOX 927674 SAN DIEGO, CA 92192-7674 Legal Owner Name ZANDIAN, REZA Vesting Doc#, Date 342193 02/04/05 Book/Page / Map Document #s RS90448

[Add'l Addresses](#)
[Assessor Maps](#)
[Legal Description](#)

[Ownership History](#)
[Document History](#)

Description	Appraisal Classifications
Total Acres .220 Ag Acres .000 W/R Acres .000 <u>Improvements</u> Single-fam Detached 0 Non-dwell Units 0 Bdrm/Bath 0/00 Single-fam Attached 0 MH Hookups 0 Stories .0 Multi-fam Units 0 Wells 0 Mobile Homes 0 Septic Tanks 0 Total Dwelling Units 0 Bldg Sq Ft 0 Garage Sq Ft 0 Atch/Detch Basement Sq Ft 0 Finished 0 Improvement List	Current Land Use Code 140 Zoning C2 Re-appraisal Group 5 Re-appraisal Year 2008 Orig Constr Year Weighted Year Code Table

Assessed Valuation	Taxable Valuation																																																																																								
<table border="1"> <thead> <tr> <th>Assessed Values</th> <th>2012-13</th> <th>2011-12</th> <th>2010-11</th> </tr> </thead> <tbody> <tr> <td>Land</td> <td>15,560</td> <td>15,560</td> <td>15,560</td> </tr> <tr> <td>Improvements</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Personal Property</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Ag Land</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Exemptions</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Net Assessed Value</td> <td>15,560</td> <td>15,560</td> <td>15,560</td> </tr> <tr> <td>Increased (New) Values</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Land</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Improvements</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Personal Property</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Assessed Values	2012-13	2011-12	2010-11	Land	15,560	15,560	15,560	Improvements	0	0	0	Personal Property	0	0	0	Ag Land	0	0	0	Exemptions	0	0	0	Net Assessed Value	15,560	15,560	15,560	Increased (New) Values				Land	0	0	0	Improvements	0	0	0	Personal Property	0	0	0	<table border="1"> <thead> <tr> <th>Taxable Values</th> <th>2012-13</th> <th>2011-12</th> <th>2010-11</th> </tr> </thead> <tbody> <tr> <td>Land</td> <td>44,457</td> <td>44,457</td> <td>44,457</td> </tr> <tr> <td>Improvements</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Personal Property</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Ag Land</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Exemptions</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Net Taxable Value</td> <td>44,457</td> <td>44,457</td> <td>44,457</td> </tr> <tr> <td>Increased (New) Values</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Land</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Improvements</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Personal Property</td> <td>0</td> <td>0</td> <td>0</td> </tr> </tbody> </table>	Taxable Values	2012-13	2011-12	2010-11	Land	44,457	44,457	44,457	Improvements	0	0	0	Personal Property	0	0	0	Ag Land	0	0	0	Exemptions	0	0	0	Net Taxable Value	44,457	44,457	44,457	Increased (New) Values				Land	0	0	0	Improvements	0	0	0	Personal Property	0	0	0
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Personal Property	0	0	0																																																																																						



[Assessor Home](#) [Back to Search List](#)
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Parcel Detail for Parcel # 006-052-06

Location	
Property Location 105 PIKE ST	Add'l Addresses
Town DAYTON	Assessor Maps
Subdivision DAYTON TOWN Lot 6 Block 6	Legal Description
Property Name	
Remarks	

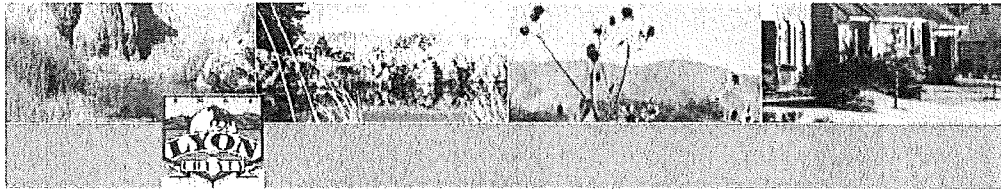
Ownership	
Assessed Owner Name ZANDIAN, REZA	Ownership History
Mailing Address P O BOX 927674	Document History
SAN DIEGO, CA 92192-7674	
Legal Owner Name ZANDIAN, REZA	
Vesting Doc#, Date 342193 02/04/05 Book/Page /	
Map Document #s RS90446	

Description		
Total Acres .220	Ag Acres .000	W/R Acres .000
<u>Improvements</u>		
Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/.00
Single-fam Attached 0	MH Hookups 0	Stories .0
Multi-fam Units 0	Wells 0	
Mobile Homes 0	Septic Tanks 0	
Total Dwelling Units 0	Bldg Sq Ft 0	
	Garage Sq Ft 0	Attch/Detch
Improvement List	Basement Sq Ft 0	Finished 0

Appraisal Classifications	
Current Land Use Code 140	Code Table
Zoning G2	
Re-appraisal Group 5	Re-appraisal Year 2008
Orig Constr Year	Weighted Year

Assessed Valuation			
Assessed Values	2012-13	2011-12	2010-11
Land	15,560	15,560	15,560
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	15,560	15,560	15,560
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	44,457	44,457	44,457
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	44,457	44,457	44,457
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



[Assessor Home](#) [Back to Search List](#)
[Personal Property](#) [Sales Data](#) [Secured Tax Inquiry](#) [Recorder Search](#)

Parcel Detail for Parcel # 015-311-18

Location

Property Location HWY 50
 Town STAGECOACH [Add'l Addresses](#)
 Subdivision Lot Block [Assessor Maps](#)
 Property Name [Legal Description](#)

Remarks

Ownership

Assessed Owner Name ZANDIAN, REZA ET AL
 Mailing Address P O BOX 927674 [Ownership History](#)
 Add'l Owners SAN DIEGO, CA 92192-7674 [Document History](#)

Legal Owner Name ZANDIAN, REZA ET AL
 Vesting Doc#, Date 344412 03/03/05 Book/Page ?
 Map Document #s RS332209

Description

Total Acres 241.790 Ag Acres .000 W/R Acres .000

Improvements

Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/00
Single-fam Attached 0	MH Hookups 0	Stories .0
Multi-fam Units 0	Wells 0	
Mobile Homes 0	Septic Tanks 0	
Total Dwelling Units 0	Bldg Sq Ft 0	
	Garage Sq Ft 0	Attch/Detch
Improvement List	Basement Sq Ft 0	Finished 0

Appraisal Classifications

Current Land Use Code 120 [Code Table](#)

Zoning RR3
 Re-appraisal Group 1 Re-appraisal Year 2009
 Orig Constr Year Weighted Year

Assessed Valuation

Assessed Values	2012-13	2011-12	2010-11
Land	24,500	24,500	24,500
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	24,500	24,500	24,500
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

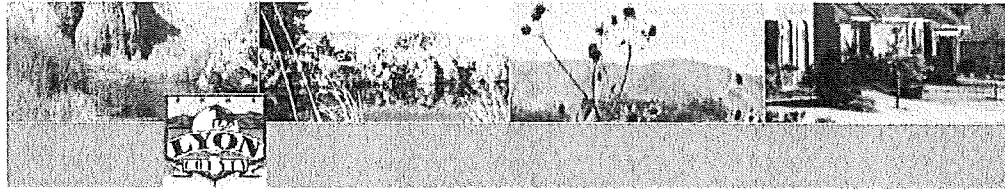
Taxable Valuation

Taxable Values	2012-13	2011-12	2010-11
Land	70,000	70,000	70,000
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	70,000	70,000	70,000
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Ownership History for Parcel # 015-311-18				
Current Owners		Prior Owners		
Name	From	Name	From	To
EL-SABAWI, RASHAD TR	2006	DEAD DOG RANCH LLC	1997	2005
EL-SABAWI, REEM TR	2006	% LORETTA MC INTIRE		
FAYEGHI, JOHNATHON	2006	804 RED'S GRADE		
EAGLES NEST LLC	2006	CARSON CITY, NV 89703		
ZANDIAN, REZA ET AL 8775 COSTA VERDE APT 1416 SAN DIEGO, CA 92122-0000	2005			
FOUGHANI, NILOOFAR	2005			
ABRISHAMI, ELIAS	2005			
ABRISHAMI, MONOO	2005			
ABRISHAMI, ENAYAT	2005			
ABRISHAMI, NAIMA	2005			

NOTE: This is not a complete history and should not be used in place of a title search.

Close Window



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Parcel Detail for Parcel # 015-311-19

Location

Property Location HWY 50
 Town STAGECOACH [Add'l Addresses](#)
 Subdivision Lot Block [Assessor Maps](#)
 Property Name [Legal Description](#)

Remarks ZONE CHANGE FROM RR3 TO C2 6/1/2006

Ownership

Assessed Owner Name ZANDIAN, REZA ET AL
 Mailing Address P O BOX 927674 [Ownership History](#)
 Add'l Owners SAN DIEGO, CA 92192-7674 [Document History](#)

Legal Owner Name ZANDIAN, REZA ET AL
 Vesting Doc#, Date 344412 03/03/05 Book/Page /
 Map Document #s RS332209

Description

Total Acres 47.750 Ag Acres .000 W/R Acres .000

Improvements

Single-fam Detached 0	Non-dwell Units 0	Bdrn/Bath 07.00
Single-fam Attached 0	MH Hookups 0	Stories 0
Multi-fam Units 0	Wells 0	
Mobile Homes 0	Septic Tanks 0	
Total Dwelling Units 0	Bldg Sq Ft 0	
	Garage Sq Ft 0	Atch/Detch
Improvement List	Basement Sq Ft 0	Finished 0

Appraisal Classifications

Current Land Use Code 140 [Code Table](#)

Zoning C2
 Re-appraisal Group 1 Re-appraisal Year 2009
 Orig Constr Year Weighted Year

Assessed Valuation

Assessed Values	2012-13	2011-12	2010-11
Land	16,710	16,710	16,710
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	16,710	16,710	16,710
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation

Taxable Values	2012-13	2011-12	2010-11
Land	47,743	47,743	47,743
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	47,743	47,743	47,743
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

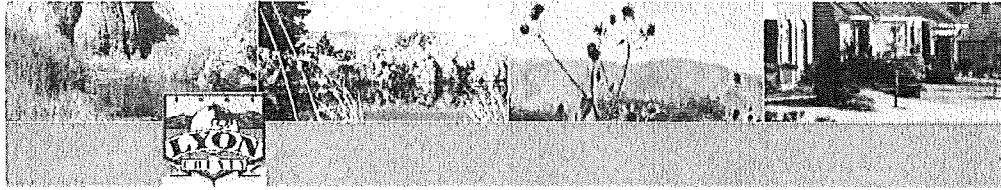
Ownership History for Parcel # 015-311-19

Current Owners	
Name	From
EL-SABAWI, RASHAD TR	2006
EL-SABAWI, REEM TR	2006
FAYEGHI, JOHNATHON	2006
EAGLES NEST LLC	2006
ZANDIAN, REZA ET AL 8775 COSTA VERDE APT 1416 SAN DIEGO, CA 92122-0000	2005
FOUGHANI, NILOOFAR	2005
ABRISHAMI, ELIAS	2005
ABRISHAMI, MINOO	2005
ABRISHAMI, ENAYAT	2005
ABRISHAMI, NAIMA	2005

Prior Owners		
Name	From	To
DEAD DOG RANCH LLC % LORETTA MC INTIRE 804 RED'S GRADE CARSON CITY, NV 89703	1997	2005

NOTE: This is not a complete history and should not be used in place of a title search

Close Window



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[Secured Tax Inquiry](#)

[Recorder Search](#)

Parcel Detail for Parcel # 021-451-22

Location	
Property Location	Town FERNLEY
Subdivision	Lot Block
Property Name	
Remarks	

Ownership	
Assessed Owner Name	ZANDIAN, REZA ET AL
Mailing Address	P O BOX 927674 SAN DIEGO, CA 92192-7674
Legal Owner Name	ZANDIAN, REZA ET AL
Vesting Doc#, Date	356791 07/19/05 Book/Page /
Map Document #s	

Description	
Total Acres	40.000
Ag Acres	.000
W/R Acres	.000
Improvements	
Single-fam Detached	0
Single-fam Attached	0
Multi-fam Units	0
Mobile Homes	0
Total Dwelling Units	0
Non-dwell Units	0
MH Hookups	0
Wells	0
Septic Tanks	0
Bldg Sq Ft	0
Garage Sq Ft	0
Basement Sq Ft	0
BdrmvBath	07.00
Stories	.0
Attch/Detch	
Finished	0

Appraisal Classifications	
Current Land Use Code	120
Zoning	RR5
Re-appraisal Group	4
Orig Constr Year	
Re-appraisal Year	2007
Weighted Year	

Assessed Valuation			
Assessed Values	2012-13	2011-12	2010-11
Land	3,360	3,360	3,360
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	3,360	3,360	3,360
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	9,600	9,600	9,600
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	9,600	9,600	9,600
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Ownership History for Parcel # 021-451-22

Current Owners	
Name	From
ZANDIAN, REZA ET AL 8775 COSATA VERDE STE 1416 SAN DIEGO, CA 92122-0000	2005
FOUGHANI, NILOOFAR	2005

Prior Owners		
Name	From	To
ARNOLD, JACK G 10410 98 ST ANDERSON ISLAND, WA 98303-0000	2003	2005
EVANS, INGRID P O BOX 1182 RENO, NV 89504	1986	2003
EVANS, LAWRENCE & INGRID P O BOX 1182 RENO, NV 89504	1986	2003

NOTE: This is not a complete history and should not be used in place of a title search.

Close Window

Exhibit 7

Exhibit 7



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Parcel Detail for Parcel # 007-151-77

<p align="center">Location</p> <p>Property Location 8825 BRUSH GARDEN DR</p> <p>Town Add'l Addresses</p> <p>Subdivision M&B Lot Block Assessor Maps</p> <p>Property Name Legal Description</p> <p>Remarks SPLIT PURSUANT TO DEED</p>	<p align="center">Ownership</p> <p>Assessed Owner Name ZANDIAN REZA & NILOOFAR</p> <p>Mailing Address P O BOX 927674 Add'l Owners SAN DIEGO CA 92192-7674</p> <p>Ownership History</p> <p>Document History</p> <p>Legal Owner Name ZANDIAN REZA & NILOOFAR</p> <p>Vesting Doc#, Date 384273 07/27/06 Book/Page / Map Document #s 194366</p>
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<p align="center">Description</p> <p>Total Acres 6.750 Ag Acres .000 W/R Acres .000</p> <p align="center">Improvements</p> <table style="width:100%;"> <tr> <td>Single-fam Detached 0</td> <td>Non-dwell Units 0</td> <td>Bdrm/Bath 0/00</td> </tr> <tr> <td>Single-fam Attached 0</td> <td>MH Hookups 0</td> <td>Stories .0</td> </tr> <tr> <td>Multi-fam Units 0</td> <td>Wells 0</td> <td></td> </tr> <tr> <td>Mobile Homes 0</td> <td>Septic Tanks 0</td> <td></td> </tr> <tr> <td>Total Dwelling Units 0</td> <td>Bldg Sq Ft 0</td> <td></td> </tr> <tr> <td></td> <td>Garage Sq Ft 0</td> <td>Attch/Detch</td> </tr> <tr> <td>Improvement List</td> <td>Basement Sq Ft 0</td> <td>Finished 0</td> </tr> </table>	Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/00	Single-fam Attached 0	MH Hookups 0	Stories .0	Multi-fam Units 0	Wells 0		Mobile Homes 0	Septic Tanks 0		Total Dwelling Units 0	Bldg Sq Ft 0			Garage Sq Ft 0	Attch/Detch	Improvement List	Basement Sq Ft 0	Finished 0	<p align="center">Appraisal Classifications</p> <p>Current Land Use Code 100 Code Table</p> <p>Zoning C2</p> <p>Re-appraisal Group 3 Re-appraisal Year 2011</p> <p>Orig Constr Year Weighted Year</p>
Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/00																				
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Parcel Detail for Parcel # 009-331-04

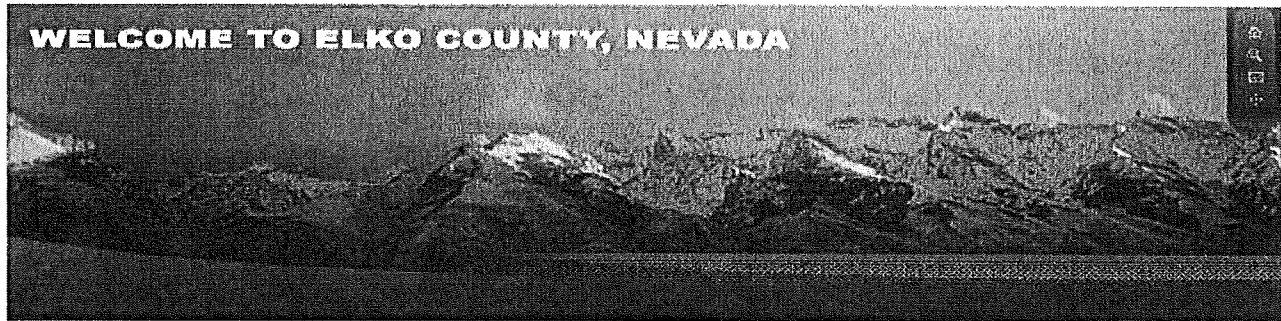
<p align="center">Location</p> <p>Property Location 29-20-27 Town Subdivision 29-20-27 NW1/4 Lot Block Property Name Remarks</p> <p align="center">Add'l Addresses Assessor Maps Legal Description</p>	<p align="center">Ownership</p> <p>Assessed Owner Name ZANDIAN R & FOUGHANI N Mailing Address P O BOX 927674 Add'l Owners SAN DIEGO CA 92192-7674</p> <p align="center">Ownership History Document History</p> <p>Legal Owner Name ZANDIAN R & FOUGHANI N Vesting Doc#, Date 372686 07/06/05 Book/Page / Map Document #s</p>
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<p align="center">Description</p> <p>Total Acres 50.000 Ag Acres .000 W/R Acres .000</p> <p align="center"><u>Improvements</u></p> <table style="width:100%"> <tr> <td>Single-fam Detached 0</td> <td>Non-dwell Units 0</td> <td>Bdrm/Bath 0/.00</td> </tr> <tr> <td>Single-fam Attached 0</td> <td>MH Hookups 0</td> <td>Stories .0</td> </tr> <tr> <td>Multi-fam Units 0</td> <td>Wells 0</td> <td></td> </tr> <tr> <td>Mobile Homes 0</td> <td>Septic Tanks 0</td> <td></td> </tr> <tr> <td>Total Dwelling Units 0</td> <td>Bldg Sq Ft 0</td> <td></td> </tr> <tr> <td></td> <td>Garage Sq Ft 0</td> <td>Attch/Detch</td> </tr> <tr> <td>Improvement List</td> <td>Basement Sq Ft 0</td> <td>Finished 0</td> </tr> </table>	Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/.00	Single-fam Attached 0	MH Hookups 0	Stories .0	Multi-fam Units 0	Wells 0		Mobile Homes 0	Septic Tanks 0		Total Dwelling Units 0	Bldg Sq Ft 0			Garage Sq Ft 0	Attch/Detch	Improvement List	Basement Sq Ft 0	Finished 0	<p align="center">Appraisal Classifications</p> <p>Current Land Use Code 100</p> <p align="center">Code Table</p> <p>Zoning RR20 Re-appraisal Group 3 Re-appraisal Year 2011 Orig Constr Year Weighted Year</p>
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Exhibit 8

Exhibit 8



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Parcel Detail for Parcel # 001-660-034

<p style="text-align: center;">Location</p> <p>Property Location EL ARMUTH DR Town ELKO CITY Add'l Addresses Subdivision Lot Block Assessor Maps Property Name Legal Description</p>	<p style="text-align: center;">Ownership</p> <p>Assessed Owner Name ZANDIAN, REZA ET AL Mailing Address Ownership History PO BOX 927674 SAN DIEGO CA 92192-7674 Document History Legal Owner Name ZANDIAN, REZA ET AL Vesting Doc#, Date 560545 09/25/06 Book/Page / Map Document #s</p>
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<p style="text-align: center;">Description</p> <p>Total Acres 17.600 Ag Acres .000 W/R Acres .000</p> <p style="text-align: center;"><u>Improvements</u></p> <table border="0"> <tr> <td>Single-fam Detached 0</td> <td>Non-dwell Units 0</td> <td>Bdrm/Bath 0/.00</td> </tr> <tr> <td>Single-fam Attached 0</td> <td>MH Hookups 0</td> <td>Stories .0</td> </tr> <tr> <td>Multi-fam Units 0</td> <td>Wells 0</td> <td></td> </tr> <tr> <td>Mobile Homes 0</td> <td>Septic Tanks 0</td> <td></td> </tr> <tr> <td>Total Dwelling Units 0</td> <td>Bldg Sq Ft 0</td> <td></td> </tr> <tr> <td></td> <td>Garage Sq Ft 0</td> <td>Attch/Detch</td> </tr> <tr> <td>Improvement List</td> <td>Basement Sq Ft 0</td> <td>Finished 0</td> </tr> </table>	Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/.00	Single-fam Attached 0	MH Hookups 0	Stories .0	Multi-fam Units 0	Wells 0		Mobile Homes 0	Septic Tanks 0		Total Dwelling Units 0	Bldg Sq Ft 0			Garage Sq Ft 0	Attch/Detch	Improvement List	Basement Sq Ft 0	Finished 0	<p style="text-align: center;">Appraisal Classifications</p> <p>Current Land Use Code 120 Code Table Zoning R RE Re-appraisal Group Y Re-appraisal Year 2009 Orig Constr Year Weighted Year</p>
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Exhibit 9

Exhibit 9

11000 RENO HIGHWAY, FALLON, L.L.C.

Business Entity Information			
Status:	Active	File Date:	6/09/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0363852005-8
Qualifying State:	NV	List of Officers Due:	6/30/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051368188	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
Manager - SEAN S FAYEGHI				
Address 1:	1401 S LAS VEGAS BLVD	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:	USA	
Status:	Active	Email:		
Manager - SHA REZAIE				
Address 1:	1401 S LAS VEGAS BLVD	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:	USA	
Status:	Active	Email:		
Manager - REZA ZANDIAN				
Address 1:	1401 S LAS VEGAS BLVD	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:	USA	
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050222393-68	# of Pages:	1
File Date:	6/09/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	20050222394-79	# of Pages:	2
File Date:	6/09/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060232918-43	# of Pages:	1
File Date:	4/12/2006	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20060601627-50	# of Pages:	1
File Date:	9/19/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070460170-57	# of Pages:	1
File Date:	7/02/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080514441-09	# of Pages:	1
File Date:	7/30/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090396003-02	# of Pages:	1
File Date:	4/30/2009	Effective Date:	
09-10			
Action Type:	Annual List		
Document Number:	20100743536-41	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			

Exhibit 10

Exhibit 10



CHURCHILL COUNTY

Office of the Assessor

[Assessor Home](#)

[Back to Search List](#)

[Personal Property](#)

[Sales Data](#)

[Secured Tax Inquiry](#)

[Recorder Search](#)

Parcel Detail for Parcel # 007-091-12

Location

Property Location 11000 RENO HWY
Town HAZEN

[Add'l Addressés](#)

Subdivision M&B Lot Block

[Assessor Maps](#)

Property Name

[Legal Description](#)

Remarks

Ownership

Assessed Owner Name 11000 RENO HIGHWAY
FALLON LLC

Mailing Address 1401 LAS VEGAS BLVD S
LAS VEGAS NV 89104-1327

[Ownership History](#)

[Document History](#)

Legal Owner Name 11000 RENO HIGHWAY
FALLON LLC

Vesting Doc#, Date 372233 06/22/05 Book/Page /
Map Document #s

Description

Total Acres 640.000 Ag Acres .000 W/R Acres .000

Improvements

Single-fam Detached 0 Non-dwell Units 0 Bdrm/Bath 0/00

Single-fam Attached 0 MH Hookups 0 Stories .0

Multi-fam Units 0 Wells 0

Mobile Homes 0 Septic Tanks 0

Total Dwelling Units 0 Bldg Sq Ft 0

Garage Sq Ft 0 Attch/Detch

[Improvement List](#) Basement Sq Ft 0 Finished 0

Appraisal Classifications

Current Land Use Code 180

[Code Table](#)

Zoning RR20

Re-appraisal Group 3

Re-appraisal Year 2011

Orig Constr Year

Weighted Year

Assessed Valuation

Assessed Values	2012-13	2011-12	2010-11
Land	56,000	56,000	201,600
Improvements	458	468	530
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Assessed Value	56,458	56,468	202,130
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Taxable Valuation

Taxable Values	2012-13	2011-12	2010-11
Land	160,000	160,000	576,000
Improvements	1,309	1,337	1,514
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
Net Taxable Value	161,309	161,337	577,514
Increased (New) Values			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

Exhibit 11

Exhibit 11

MISFITS DEVELOPMENT L.L.C.

Business Entity Information			
Status:	Active	File Date:	8/26/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0571202005-3
Qualifying State:	NV	List of Officers Due:	8/31/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051069626	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVE SUITE 150
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	8 SAN RAMON DR	Mailing Address 2:	
Mailing City:	IRVINE	Mailing State:	CA
Mailing Zip Code:	92612		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - SAEID AMINPOUR				
Address 1:	701 NORTHE CAMDEN DR	Address 2:		
City:	BEVERLY HILLS	State:	CA	
Zip Code:	90201	Country:	USA	
Status:	Active	Email:		
Managing Member - NICHOLAS ESKANDARI				
Address 1:	433 N CAMDEN STE 400	Address 2:		
City:	BEVERLY HILLS	State:	CA	
Zip Code:	90210	Country:	USA	
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	P.O.BOX 927674	Address 2:		
City:	SAN DIEGO	State:	CA	
Zip Code:	92192-7674	Country:	USA	
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050351501-12	# of Pages:	1
File Date:	8/26/2005	Effective Date:	
(No notes for this action)			

Action Type:	Initial List		
Document Number:	20050356456-56	# of Pages:	1
File Date:	8/29/2005	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20050555770-86	# of Pages:	1
File Date:	11/16/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060673303-50	# of Pages:	1
File Date:	10/18/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070683552-98	# of Pages:	1
File Date:	10/02/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080564590-59	# of Pages:	1
File Date:	8/25/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090676689-23	# of Pages:	1
File Date:	9/11/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100642222-11	# of Pages:	1
File Date:	8/26/2010	Effective Date:	
(No notes for this action)			

Exhibit 12

Exhibit 12

ELKO NORTH 5TH AVE, LLC

Business Entity Information			
Status:	Active	File Date:	8/31/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0580312005-7
Qualifying State:	NV	List of Officers Due:	8/31/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051442315	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVE SUITE 150
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	7590 FAY AVE, SUITE 401	Mailing Address 2:	
Mailing City:	LA JOLLA	Mailing State:	CA
Mailing Zip Code:	92037		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - CHAKAMIAN 2004 TRUST			
Address 1:	7590 FAY AVE, #401	Address 2:	
City:	LA JOLLA	State:	CA
Zip Code:	92037	Country:	
Status:	Active	Email:	
Managing Member - MOINZADEH FAMILY REVOCABLE TRUST			
Address 1:	7590 FAY AVE, #401	Address 2:	
City:	LA JOLLA	State:	CA
Zip Code:	92037	Country:	
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	P.O. BOX 927674	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92192	Country:	USA
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050364566-57	# of Pages:	2
File Date:	8/31/2005	Effective Date:	
REG MAIL SAE 9-1-05			

Action Type:	Initial List		
Document Number:	20050437973-30	# of Pages:	1
File Date:	9/27/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060673304-61	# of Pages:	1
File Date:	10/18/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070574309-37	# of Pages:	1
File Date:	8/20/2007	Effective Date:	
07-08			
Action Type:	Annual List		
Document Number:	20080564591-60	# of Pages:	1
File Date:	8/25/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090676691-66	# of Pages:	1
File Date:	9/11/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100642221-00	# of Pages:	1
File Date:	8/26/2010	Effective Date:	
(No notes for this action)			

Exhibit 13

Exhibit 13

STAGECOACH VALLEY LLC.

Business Entity Information			
Status:	Active	File Date:	4/09/2007
Type:	Domestic Limited-Liability Company	Entity Number:	E0263162007-6
Qualifying State:	NV	List of Officers Due:	4/30/2012
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20071497897	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVENUE
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	8775 COSTA VERDE #501	Mailing Address 2:	
Mailing City:	SAN DIEGO	Mailing State:	CA
Mailing Zip Code:	92122		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - BIJAN AKHAVAN				
Address 1:	15456 VENTURA BLVD #300	Address 2:		
City:	SHERMAN OAKS	State:	CA	
Zip Code:	91403	Country:		
Status:	Active	Email:		
Managing Member - SASSAN CHAKAMIAN				
Address 1:	7590 FAY AVE. STE 401	Address 2:		
City:	LA JOLLA	State:	CA	
Zip Code:	92037	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	830 LAS VEGAS BLVD SOUTH	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89101	Country:		
Status:	Active	Email:		

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20070248707-47	# of Pages:	2
File Date:	4/09/2007	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	20070248709-69	# of Pages:	1
File Date:	4/09/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080270927-97	# of Pages:	1
File Date:	4/21/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20090676690-55	# of Pages:	1
File Date:	9/11/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100642220-99	# of Pages:	1
File Date:	8/26/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110343835-00	# of Pages:	1
File Date:	5/06/2011	Effective Date:	
11-12			

Exhibit 14

Exhibit 14

ROCK AND ROYALTY LLC

Business Entity Information			
Status:	Revoked	File Date:	4/28/2008
Type:	Domestic Limited-Liability Company	Entity Number:	E0277292008-8
Qualifying State:	NV	List of Officers Due:	4/30/2009
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20081306105	Business License Exp:	

Additional Information	
Series LLC (YES if applicable):	YES

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	1401 S. LAS VEGAS BLVD
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:	8775 COSTA VERDE #501	Mailing Address 2:	
Mailing City:	SAN DIEGO	Mailing State:	CA
Mailing Zip Code:	92122		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - NILOOFAR FOUGHANI ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD	Address 2:	#501
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20080290681-46	# of Pages:	2
File Date:	4/28/2008	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20080373743-57	# of Pages:	1
File Date:	5/29/2008	Effective Date:	
08-09			

Exhibit 15

Exhibit 15

GOLD CANYON DEVELOPMENT LLC

Business Entity Information			
Status:	Default	File Date:	5/27/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC11545-2004
Qualifying State:	NV	List of Officers Due:	5/31/2011
Managed By:	Managers	Expiration Date:	5/27/2504
NV Business ID:	NV20041117776	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	220 SUSSEX PL
Address 2:		City:	CARSON CITY
State:	NV	Zip Code:	89703
Phone:		Fax:	
Mailing Address 1:	PO BOX 2919	Mailing Address 2:	
Mailing City:	CARSON CITY	Mailing State:	NV
Mailing Zip Code:	89702		
Agent Type:	Noncommercial Registered Agent		

Financial Information	
No Par Share Count:	0
Capital Amount:	\$ 0
No stock records found for this company	

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - ELIAS ABRISHAMI			
Address 1:	P O BOX 10476	Address 2:	
City:	BEVERLY HILLS	State:	CA
Zip Code:	90213	Country:	
Status:	Active	Email:	
Managing Member - RAFI ABRISHAMI			
Address 1:	P O BOX 10325	Address 2:	
City:	BEVERLY HILLS	State:	CA
Zip Code:	90213	Country:	
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD., #501	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC11545-2004-001	# of Pages:	1
File Date:	5/27/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	LLC11545-2004-002	# of Pages:	1
File Date:	7/11/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Registered Agent Change		
Document Number:	LLC11545-2004-003	# of Pages:	1
File Date:	11/16/2004	Effective Date:	
ELIAS ABRISHAMI SUITE #1011			
9550 W. SAHARA AVENUE LAS VEGAS NV 89117 RXS			
ELIAS ABRISHAMI RXS			
RXS			
Action Type:	Annual List		
Document Number:	20050163958-39	# of Pages:	1
File Date:	5/02/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060176567-90	# of Pages:	1
File Date:	3/20/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070373918-40	# of Pages:	1
File Date:	5/29/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080344948-12	# of Pages:	1
File Date:	5/19/2008	Effective Date:	
2008-2009			
Action Type:	Annual List		
Document Number:	20090433604-71	# of Pages:	1
File Date:	5/20/2009	Effective Date:	
09-10			
Action Type:	Annual List		
Document Number:	00002746565-45	# of Pages:	1
File Date:	5/28/2010	Effective Date:	
10-11			

Exhibit 16

Exhibit 16

HIGH-TECH DEVELOPMENT LLC

Business Entity Information			
Status:	Dissolved	File Date:	9/22/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC21816-2004
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:	Managers	Expiration Date:	9/22/2504
NV Business ID:	NV20041220539	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	8350 W SAHARA AVE
Address 2:	STE 150	City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers		<input type="checkbox"/> Include Inactive Officers	
Managing Member - ELIAS ABRISHAMI			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
Managing Member - RAFI ABRISHAMI			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
Managing Member - REZA ZANDIAN			
Address 1:	220 SUSSEX PL	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Active	Email:	

Actions\Amendments			
Action Type:	Articles of Organization	# of Pages:	1
Document Number:	LLC21816-2004-001	Effective Date:	
File Date:	9/22/2004		
(No notes for this action)			
Action Type:	Initial List		

Document Number:	LLC21816-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Dissolution		
Document Number:	20050090100-27	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			

Exhibit 17

Exhibit 17

LYON PARK DEVELOPMENT LLC**Business Entity Information**

Status:	Dissolved	File Date:	9/22/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC21824-2004
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:	Managers	Expiration Date:	9/22/2504
NV Business ID:	NV20041220616	Business License Exp:	

Registered Agent Information

Name:	ELIAS ABRISHAMI	Address 1:	8350 W SAHARA AVE
Address 2:	STE 150	City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers Include Inactive Officers**Managing Member - ELIAS ABRISHAMI**

Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	

Managing Member - RAFI ABRISHAMI

Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	

Managing Member - REZA ZANDIAN

Address 1:	220 SUSSEX PL	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89703	Country:	
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Organization		
Document Number:	LLC21824-2004-001	# of Pages:	1
File Date:	9/22/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	LLC21824-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Dissolution		
Document Number:	20050090105-72	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			

Exhibit 18

Exhibit 18

CHURCHILL PARK DEVELOPMENT LLC

Business Entity Information			
Status:	Dissolved	File Date:	9/22/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC21827-2004
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:	Managers	Expiration Date:	9/22/2504
NV Business ID:	NV20041220644	Business License Exp:	

Registered Agent Information			
Name:	ELIAS ABRISHAMI	Address 1:	8350 W SAHARA AVE
Address 2:	STE 150	City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - ELIAS ABRISHAMI				
Address 1:	PO BOX 2919	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89702	Country:		
Status:	Active	Email:		
Managing Member - RAFI ABRISHAMI				
Address 1:	PO BOX 2919	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89702	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	220 SUSSEX PL	Address 2:		
City:	CARSON CITY	State:	NV	
Zip Code:	89703	Country:		
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC21827-2004-001	# of Pages:	1
File Date:	9/22/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	LLC21827-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Dissolution		
Document Number:	20050090112-60	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			

Exhibit 19

Exhibit 19

SPARKS VILLAGE LLC

Business Entity Information			
Status:	Default	File Date:	12/15/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC29380-2004
Qualifying State:	NV	List of Officers Due:	12/31/2010
Managed By:	Managers	Expiration Date:	12/15/2504
NV Business ID:	NV20041295883	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information	
No Par Share Count:	0
Capital Amount:	\$ 0
No stock records found for this company	

Officers		<input type="checkbox"/> Include Inactive Officers	
Manager - SEAN S FAYEGHI			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	
Manager - REZA ZANDIAN			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	LLC29380-2004-001	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	LLC29380-2004-002	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Annual List		
Document Number:	20050561932-73	# of Pages:	1

File Date:	11/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070107298-06	# of Pages:	1
File Date:	2/08/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070801466-64	# of Pages:	1
File Date:	11/26/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080805719-20	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
08-09			
Action Type:	Annual List		
Document Number:	20100743562-60	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			

Exhibit 20

Exhibit 20

OPTIMA TECHNOLOGY CORPORATION

Business Entity Information			
Status:	Revoked	File Date:	10/11/2004
Type:	Domestic Close Corporation	Entity Number:	C27410-2004
Qualifying State:	NV	List of Officers Due:	10/31/2008
Managed By:		Expiration Date:	
NV Business ID:	NV20041618927	Business License Exp:	

Registered Agent Information			
Name:	REZA ZANDIAN	Address 1:	8350 W. SAHARA AVE SUITE 150
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89117
Phone:		Fax:	
Mailing Address 1:	8 SAN RAMON DR	Mailing Address 2:	
Mailing City:	IRVINE	Mailing State:	CA
Mailing Zip Code:	92612		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	10,000.00	Capital Amount:	\$ 0
No stock records found for this company			

Officers		<input type="checkbox"/> Include Inactive Officers	
President - REZA ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	USA
Status:	Active	Email:	
Secretary - REZA ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	USA
Status:	Active	Email:	
Treasurer - REZA ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	USA
Status:	Active	Email:	
Director - REZA ZANDIAN			
Address 1:	8775 COSTA VERDE BLVD #501	Address 2:	
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	USA
Status:	Active	Email:	

Actions/Amendments

Action Type:	Articles of Incorporation		
Document Number:	C27410-2004-001	# of Pages:	1
File Date:	10/11/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	C27410-2004-002	# of Pages:	1
File Date:	10/11/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Annual List		
Document Number:	20050611409-08	# of Pages:	1
File Date:	12/13/2005	Effective Date:	
(No notes for this action)			
Action Type:	Amended List		
Document Number:	20060416290-50	# of Pages:	1
File Date:	6/28/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060673305-72	# of Pages:	1
File Date:	10/18/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070840329-25	# of Pages:	1
File Date:	12/11/2007	Effective Date:	
(No notes for this action)			

Exhibit 21

Exhibit 21

I-50 PLAZA LLC

Business Entity Information			
Status:	Default	File Date:	2/03/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0011952005-5
Qualifying State:	NV	List of Officers Due:	2/28/2011
Managed By:	Managers	Expiration Date:	2/03/2505
NV Business ID:	NV20051209794	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
Managing Member - SEAN S FAYEGHI				
Address 1:	1401 S. LAS VEGAS BLVD.	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:		
Status:	Active	Email:		
Managing Member - REZA ZANDIAN				
Address 1:	8350 W. SAHARA AVE.	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89117	Country:		
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050007640-04	# of Pages:	2
File Date:	2/03/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20050007642-26	# of Pages:	1
File Date:	2/03/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20050632605-29	# of Pages:	1

File Date:	12/21/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070012183-14	# of Pages:	1
File Date:	1/04/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080097515-37	# of Pages:	1
File Date:	2/12/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080806151-81	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100743512-65	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			

Exhibit 22

Exhibit 22

DAYTON PLAZA, L.L.C.

Business Entity Information			
Status:	Default	File Date:	5/18/2005
Type:	Domestic Limited-Liability Company	Entity Number:	E0307202005-3
Qualifying State:	NV	List of Officers Due:	5/31/2011
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20051324192	Business License Exp:	Exempt - 003

Registered Agent Information			
Name:	SEAN S. FAYEGHI	Address 1:	1401 LAS VEGAS BLVD SOUTH
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89104
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input type="checkbox"/> Include Inactive Officers
Manager - SEAN S FAYEGHI				
Address 1:	1401 LAS VEGAS BLVD. SOUTH	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:		
Status:	Active	Email:		
Manager - SHAHROKH REZAI				
Address 1:	7353 SINGING TREE ST.	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89123	Country:		
Status:	Active	Email:		
Manager - REZA ZANDIAN				
Address 1:	8350 W. SAHARA AVE.	Address 2:	SUITE 150	
City:	LAS VEGAS	State:	NV	
Zip Code:	89117	Country:		
Status:	Active	Email:		

Actions\Amendments			
Action Type:	Articles of Organization		
Document Number:	20050184429-75	# of Pages:	1
File Date:	5/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

Document Number:	20050184430-07	# of Pages:	1
File Date:	5/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060282468-48	# of Pages:	1
File Date:	5/03/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070385782-52	# of Pages:	1
File Date:	5/31/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080380264-03	# of Pages:	1
File Date:	6/02/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090396017-67	# of Pages:	1
File Date:	4/30/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100743576-25	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
(No notes for this action)			

Exhibit 23

Exhibit 23

RENO HIGHWAY PLAZA, L.L.C.

Business Entity Information			
Status:	Revoked	File Date:	6/05/2006
Type:	Domestic Limited-Liability Company	Entity Number:	E0416572006-9
Qualifying State:	NV	List of Officers Due:	6/30/2007
Managed By:	Managers	Expiration Date:	
NV Business ID:	NV20061046071	Business License Exp:	

Registered Agent Information			
Name:	SEAN S. FEYEGHI	Address 1:	5945 ROBERT HAMPTON ROAD
Address 2:		City:	LAS VEGAS
State:	NV	Zip Code:	89120
Phone:		Fax:	
Mailing Address 1:	1401 SOUTH LAS VEGAS BLVD	Mailing Address 2:	
Mailing City:	LAS VEGAS	Mailing State:	NV
Mailing Zip Code:	89104		
Agent Type:	Noncommercial Registered Agent		

Financial Information			
No Par Share Count:	0	Capital Amount:	\$ 0
No stock records found for this company			

Officers		<input type="checkbox"/> Include Inactive Officers	
Manager - SEAN S FAYEGHI			
Address 1:	1401 SOUTH LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	
Manager - REZA ZANDIAN			
Address 1:	8775 CASTA VERDE BLVD	Address 2:	SUITE 1416
City:	SAN DIEGO	State:	CA
Zip Code:	92122	Country:	
Status:	Active	Email:	

Actions/Amendments			
Action Type:	Articles of Organization		
Document Number:	20060359719-12	# of Pages:	2
File Date:	6/05/2006	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		
Document Number:	20060359720-44	# of Pages:	1
File Date:	6/05/2006	Effective Date:	
(No notes for this action)			