

1 Matthew D. Francis (6978)  
2 Adam P. McMillen (10678)  
3 WATSON ROUNDS  
4 5371 Kietzke Lane  
5 Reno, NV 89511  
6 Telephone: 775-324-4100  
7 Facsimile: 775-333-8171  
8 *Attorneys for Plaintiff Jed Margolin*

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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**

**UNILATERAL CASE  
CONFERENCE REPORT**

DISPUTE RESOLUTION CONFERENCE REQUESTED:

YES \_\_\_\_\_ NO X

I.

PROCEEDINGS PRIOR TO CASE CONFERENCE REPORT

A. DATE OF FILING OF COMPLAINT:

Plaintiffs filed a Complaint on December 11, 2009.

B. IF ANY DEFENDANT HAS FILED A MOTION PURSUANT TO RULES

1 12(b)(2)-(4), LIST DATE OF ENTRY OF ORDER DENYING SUCH MOTION:

2 1. Defendants' Motion to Dismiss on a Special Appearance filed June 9, 2012;

3 2. Order Setting Aside Default, Denying Motion to Dismiss and Granting  
4 Extension of Time for Service filed August 3, 2011

5 3. Defendant's Motion to Dismiss Amended Complaint on Special  
6 Appearance filed November 16, 2011.

7 4. Order Denying Defendant's Motion to Dismiss filed February 21, 2012

8 C. DATE OF FILING AND SERVICE OF ANSWER BY DEFENDANT(S):

9 Defendant Reza Zandian Reza Zandian aka Golamreza Andianjazi aka Gholameza  
10 Zandian aka Reza Jazi aka J. Reza Jazi aka G. Reza Jazi aka Ghononreza Zandian Jazi filed a  
11 General Denial on March 5, 2012. Defendants Optima Technology Corporation, a California  
12 corporation and Optima Technology Corporation, a Nevada corporation, filed a General  
13 Denial on March 13, 2012. After filing the aforementioned General Denials, this Court  
14 granted Defense counsel's Motion to Withdraw from Representation. Because no counsel for  
15 the Defendant corporations has appeared since the Motion to Withdraw was granted, Plaintiff  
16 filed "Plaintiff's Motion to Compel Appearance of Counsel for Optima Technology  
17 Corporations, or in the Alternative, Motion to Strike General Denial of Optima Technology  
18 Corporations" on May 15, 2012. Because no opposition was filed to Plaintiff's Motion,  
19 Plaintiff filed a Request for Submission of this Motion on June 6, 2012. That Motion is still  
20 pending.

21 OTHER PLEADINGS FILED:

22 See docket.

23 E. EXTENSION OR STIPULATIONS REGARDING TIME OF CASE

24 CONFERENCE:

25 None.

26 F. DATE THE EARLY CASE CONFERENCE WAS HELD AND WHO

27 ATTENDED:

28

1 On May 22, 2012, Plaintiff mailed a letter, by certified mail, return receipt requested,  
2 to Mr. Reza Zandian notifying him of a 16.1 early case conference on Monday, June 11, 2012.  
3 Matthew D. Francis, Esq. of Watson Rounds was prepared to attend the telephonic Rule 16.1  
4 meeting on behalf of Plaintiff, Jed Margolin. Mr. Zandian, who was to initiate the telephone  
5 call, did not do so. Mr. Zandian was to initiate the telephone call because Plaintiff and his  
6 counsel did not and do not have Mr. Zandian's telephone number.

7 G. DATE OF FILING CASE CONFERENCE REPORT:

8 See, Clerk's filed stamp.

9 II.

10 BRIEF DESCRIPTION OF THE NATURE OF THE ACTION  
11 AND EACH CLAIM FOR RELIEF OR DEFENSE

12 A. DESCRIPTION OF ACTION:

13 Plaintiff alleges that this case arises from the Defendants' fraudulent assignments of  
14 Plaintiff's patents.

15 B. CLAIMS FOR RELIEF:

16 Plaintiff claims conversion, tortious interference with contract, intentional interference  
17 with prospective economic advantage, unjust enrichment, and unfair and deceptive trade  
18 practices.

19 Defendants have not alleged any affirmative defenses.

20 III.

21 WRITTEN LIST OF DOCUMENTS AND WITNESSES PROVIDED

22 Plaintiff's production of documents and list of witnesses was served on June 14, 2012  
23 and is attached hereto as Exhibit 1.

24 IV.

25 DISCOVERY PLAN: NRCP 16.1(B)(2) AND 16.1(C)(2)

26 Plaintiff expects to conduct ordinary written discovery and depositions.

27 Plaintiff will conduct discovery according to NRCP:

28 A. Discovery will close forty-five (45) days prior to trial;

1 B. Last day to file motions to amend the pleadings or to add parties will be ninety  
2 (90) days prior to the close of discovery;

3 C. Last day for initial disclosure of expert witnesses will be ninety (90) days prior to  
4 the close of discovery; and

5 D. Last day for disclosure of rebuttal expert witnesses will be thirty (30) days after  
6 the initial disclosure of expert witnesses.

7 V.

8 STIPULATIONS REGARDING LIMITATIONS OR  
9 CONDITIONS ON ADDITIONAL DISCOVERY

10 None.

11 VI.

12 TIME REQUIRED FOR TRIAL

13 Plaintiff requests 5 days. A jury has not yet been requested.

14 VII.

15 UNRESOLVED DISCOVERY QUESTIONS

16 None.

17 VIII.

18 INITIAL DISLCOSURES/OBJECTIONS NRCP 16.1(A)(1)

19 If a party objects during the Early Case Conference that initial disclosures are not  
20 appropriate in the circumstances of this case, those objections must be stated herein. The  
21 Court shall determine what disclosures, if any, are to be made and shall set the time for such  
22 disclosure.

23 None.

24 This report is signed pursuant to NRCP 26(g)(1). The writer's signature is a  
25 certification that to the best of the signer's knowledge, information and belief, formed after a  
26 reasonable inquiry, the signer's disclosures are correct and complete at this time.

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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: June 14, 2012

WATSON ROUNDS

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


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**CERTIFICATE OF SERVICE**

Pursuant to NRC 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Unilateral Case Conference Report**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd., #501  
San Diego, CA 92122

Dated: June 14, 2012

  
\_\_\_\_\_  
Carla Ousby

# Exhibit 1

# Exhibit 1

1 Matthew D. Francis (6978)  
Adam P. McMillen (10678)  
2 WATSON ROUNDS  
5371 Kietzke Lane  
3 Reno, NV 89511  
Telephone: 775-324-4100  
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*Attorneys for Plaintiff Jed Margolin*  
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8 **In and for Carson City**  
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10 **JED MARGOLIN, an individual,**

11 **Plaintiff,**

12 **vs.**

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

20 **Defendants.**

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

**Dept. No.: 1**

**PLAINTIFF'S NRCP 16.1**  
**DISCLOSURES**

21  
22 Plaintiff Jed Margolin hereby submits the following NRCP 16.1 Initial Disclosures.  
23 Plaintiff makes these Disclosures based on the information presently available to him.  
24 Plaintiff's investigation of this case is ongoing, and Plaintiff reserves the right to supplement  
25 these Disclosures.

26 Additionally, Plaintiff makes these Disclosures subject to, and without waiving, the  
27 attorney-client privilege, the protection afforded by the work product doctrine, and/or any  
28 other applicable privilege(s). Plaintiff also expressly reserves the right to object to other



1 discovery procedures involving or relating to the persons or documents identified in these

2 Disclosures:

3 **A. LIST OF WITNESSES**

- 4 1. Jed Margolin  
5 c/o Watson Rounds  
6 5371 Kietzke Lane  
7 Reno, NV 89511

8 Mr. Margolin is expected to testify regarding all matters at issue in this action.

- 9 2. Reza Zandian  
10 8775 Costa Verde Blvd., #501  
11 San Diego, CA 92122

12 Mr. Zandian is expected to testify regarding all matters at issue in this action.

- 13 3. John Peter Lee, Esq.  
14 830 Las Vegas Blvd. South  
15 Las Vegas, Nevada 89101  
16 702-382-4044

17 Mr. Lee is expected to testify regarding all matters at issue in this action.

- 18 4. All witnesses identified by Defendant.  
19 5. Any witness identified by any other party.  
20 6. Any witness identified at a later time.  
21 7. Plaintiff reserves the right to supplement this witness list either to add or delete

22 witnesses in the event that subsequent discovery and/or investigation warrants the same.

23 **B. DOCUMENTS**

24 Plaintiff incorporates by reference all of the pleadings on file herein, and further produces  
25 and incorporates by reference the documents bates numbered MAR00001-00052.

26 **C. DAMAGES**

27 Plaintiff alleges that it is entitled to certain damages, fees, and costs from Defendants,  
28 but Plaintiff has not received all documents and information from all Defendants which would  
allow it to compute all such damages, fees, and costs at this time. Plaintiff will supplement  
this disclosure after it has received documents and information from Defendants and further  
computed damages.

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**D. INSURANCE POLICIES**

None.

**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: June 14, 2012

WATSON ROUNDS

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**CERTIFICATE OF SERVICE**

Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on this date, I deposited for mailing, in a sealed envelope, with first-class postage prepaid, a true and correct copy of the foregoing document, **Plaintiff's NRCP 16.1 Initial Disclosures**, addressed as follows:

Reza Zandian  
8775 Costa Verde Blvd., #501  
San Diego, CA 92122

Dated: June 14, 2012

  
\_\_\_\_\_  
Carla Ousby