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BY *[Signature]* CLERK
DEPUTY

1 JASON D. WOODBURY
Nevada Bar No. 6870
2 SEVERIN A. CARLSON
Nevada Bar No. 9373
3 KAEMPFER CROWELL
510 West Fourth Street
4 Carson City, Nevada 89703
Telephone: (775) 884-8300
5 Facsimile: (775) 882-0257
jwoodbury@kcnvlaw.com

6 **Attorneys for Defendant,**
7 **REZA ZANDIAN**

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

10 JED MARGOLIN, an individual,

11 Plaintiff,

Case No. 09 OC 00579 1B

12 *vs.*

Dept. No. I

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

19 Defendants.

20 **OPPOSITION TO MOTION FOR ORDER**
TO SHOW CAUSE REGARDING CONTEMPT

21 COMES NOW Defendant, REZA ZANDIAN, by and through his undersigned
22 counsel of record, Kaempfer Crowell, and hereby opposes the *Motion for Order to Show*
23 *Cause Regarding Contempt ("Motion")* filed by Plaintiff in this matter on February 12,
24 2014. This Opposition is made pursuant to FJDCR 15 and is based on NRS 21.270,

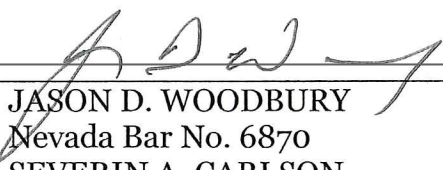
KAEMPFER CROWELL RENSHAW
GROAUER & FIORENTINO
510 W. Fourth Street
Carson City, Nevada 89703

1 NRCP 69, the attached Memorandum of Points and Authorities, all papers and
2 pleadings on file herein, and any evidence and argument allowed by the Court at a
3 hearing on the *Motion* granted pursuant to FJDCR 15 or D.C.R. 15.

4 DATED this 3rd day of March, 2014.

5 KAEMPFER CROWELL

6
7 BY:



JASON D. WOODBURY
Nevada Bar No. 6870
SEVERIN A. CARLSON
Nevada Bar No. 9373
KAEMPFER CROWELL
510 West Fourth Street
Carson City, Nevada 89703
Telephone: (775) 884-8300
Facsimile: (775) 882-0257
e-mail: jwoodbury@kcnvlaw.com
scarlson@kcnvlaw.com
Attorneys for **Defendant, REZA ZANDIAN**

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KAEMPFER CROWELL RENSHAW
GRONAUER & FLORENTINO
510 W. Fourth Street
Carson City, Nevada 89703

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. Factual Background**

3 The following facts are pertinent to this Court’s analysis in regard to Plaintiff’s
4 request for the issuance of an order to show cause why Reza Zandian should not be held
5 in contempt of this Court:¹

- 6 (1) Reza Zandian does not reside in Carson City, Nevada²;
- 7 (2) On January 13, 2014, this Court issued its *Order Granting Plaintiff’s*
8 *Motion for Debtor Examination and to Produce Documents* (“*Order for*
9 *Debtor Examination*”) ³;
- 10 (3) On January 16, 2014, counsel for Plaintiff served by regular mail a notice
11 of the entry of the *Order for Debtor Examination* upon counsel for Reza
12 Zandian⁴;

13
14 ¹ Although only a select few facts are relevant to the actual issue before the Court, Plaintiff’s *Motion* offers
15 several pages of “background”, most of which is obviously designed to engender bad will and disdain for
16 Mr. Zandian. *Motion* at 3:20 – 7:15. This *Opposition* will make no effort—because none is called for—to
17 refute material which is immaterial to the question of whether this Court should issue the requested
18 order. Suffice it to say, for now, that there are two sides to this story.

19 ² This is not to assert that there is no dispute over the residence of Mr. Zandian. Mr. Zandian continues to
20 maintain that he resides in France, while Plaintiff continues to contend that he resides in California.
21 *Compare, e.g., Affidavit of Reza Zandian in Support of Mot. to Set Aside Default J.* at ¶¶2-3 (“I am
22 currently a resident of Paris, France and have been living full-time at 6 Rue Edouard Fournier, 75116
23 Paris, France since August 11, 2011.... I have not resided in the United States since August 2011.”) (Jan.
24 17, 2014) (attached hereto and marked as Exhibit 1); *Notice of Appeal* at 1:1-3, 22-25 (identifying Reza
Zandain’s address at 6, rue Edouard Fournier, 75116 Paris, France) (Clark County District Court case
number A-11-635430-C, Dept. No. IV) (Mar. 15, 2013) (attached hereto and marked as Exhibit 2) *with,*
e.g., Application for Default J. at 13:5-7, 13-15 (April 16, 2013) (serving Mr. Zandian at one address in Fair
Oaks, California and one address in San Diego, California); *Declaration of Jed Margolin in Support of*
Appl. For Default J. at 5:6-8 (April 16, 2013) (serving Reza Zandian at address in San Diego, California);
Plaintiff’s App. for Atty’s Fees and Costs at 6:6-10 (serving Reza Zandian at two substantially similar
addresses in San Diego, California) (Feb. 15, 2013); *Complaint* at ¶4 (“On information and belief,
Defendant Reza Zandian ... is an individual who at all relevant times resided in San Diego, California or
Las Vegas, Nevada.”) (Dec. 11, 2009). This is by no means an exhaustive recitation of the evidence which
has been offered on the point of Mr. Zandian’s residence. In regard to the *Motion*, it does not matter
where Mr. Zandian resides, so long as it is not in Carson City, Nevada. And there has never been any
suggestion or indication by anyone in this case that he does.

³ See *Order Granting Pl.’s Mot. for Debtor Examination and to Produce Documents* (Jan. 13, 2014).

⁴ See *Notice of Entry of Or. Granting Pl.’s Mot. for Debtor Examination and to Produce Documents* (Jan.
16, 2014) (attached hereto and marked as Exhibit 3).

1 (4) The *Order for Debtor Examination* required Reza Zandian to appear on
2 February 11, 2014 at 9:00 a.m. before the Court in Carson City, Nevada⁵;
3 and

4 (5) The *Order for Debtor Examination* required Reza Zandian to produce 11
5 categories of documents to the office of Plaintiff's counsel no later than
6 February 4, 2014. Those categories of documents included, but were not
7 limited to:

8 (a) Any and all information and documentation identifying real
9 property, computers, cell phones, intellectual property, vehicles, brokerage
10 accounts, bank deposits and all other assets that may be available for
11 execution to satisfy the Judgment entered by the Court....

12 (b) Documents sufficient to show Zandian's balance sheet for
13 each month for the years 2007 to present;

14 (c) Documents sufficient to show Zandian's gross revenues for
15 each month for the years 2007 to present;

16 (d) Documents sufficient to show Zandian's costs and expenses
17 for each month for the years 2007 to present;

18 (e) All of Zandian's accounting records, computerized electronic
19 and/or printed on paper format for the years 2007 to the present;

20 (f) All of Zandian's statements, cancelled checks and related
21 banking documents for any bank, brokerage or other financial account at
22 least partially controlled by Zandian, or recorded in the name of Zandian
23 or for Zandian's benefit, for the years 2007 to the present;

24

⁵ See *Order for Debtor Examination* at ¶1.

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(g) All of Zandian’s checkbooks, checkbook stubs and checkbook entries for the years 2007 to the present;

(h) Documents sufficient to show the means and source of payment of Zandian’s current residence and any other residence for the years 2007 to present; and

(i) Documents sufficient to show the means and source of payment of Zandian’s counsel in this matter.⁶

As of the date of the *Order for Debtor Examination*, there had been a total of 85 months in the period referenced as “each month for the years 2007 to present.”

II. Argument

A. Reza Zandian is not a resident of Carson City and therefore NRS 21.270 does not authorize his examination in Carson City.

Plaintiff’s request for permission to conduct a debtor’s examination in this case was based upon NRS 21.270, which authorizes and regulates the procedure.⁷ As such, it seems somewhat remarkable that Plaintiff’s *Motion for Judgment Debtor Examination and to Produce Documents* quotes only a portion of the statute.⁸ Unfortunately, that that *Motion* included nothing to alert this Court that only a portion of the controlling statute was included, and that, in fact, the most relevant portion was excluded.

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⁶ See *Order for Debtor Examination* at ¶2(a) – (k).
⁷ See *Motion for Judgment Debtor Examination and to Produce Documents* at 1:24-25 (Dec. 11, 2013).
⁸ See *Motion for Judgment Debtor Examination and to Produce Documents* at 5:25 – 6:2 (1:24-25 (“Under Nevada procedure, Mr. Margolin is entitled to a debtor examination. NRS 21.270 states that ‘a judgment creditor, at any time after the judgment is entered, is entitled to an order from the judge of the court requiring the judgment debtor to appear and answer upon oath or affirmation concerning his or her

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In its entirety, NRS 21.270(1) provides:

- 1. A judgment creditor, at any time after the judgment is entered, is entitled to an order from the judge of the court requiring the judgment debtor to appear and to answer upon oath or affirmation concerning his or her property, before:
 - (a) The judge or a master appointed by the judge; or
 - (b) An attorney representing the judgment creditor,
 at a time and place specified in the order. ***No judgment debtor may be required to appear outside the county in which the judgment debtor resides.***

(Emphasis added).

The emphasized provision could not be more clear and explicit. Under *anyone's* interpretation of the evidence pertaining to the residence of Reza Zandian, there is no information indicating that he resides in Carson City, Nevada—or that he ever has, for that matter. Therefore, NRS 21.270 does not permit him to be the subject of a debtor's examination here. The *Order for Debtor's Examination* should have never been issued. Indeed, it is virtually certain that, had the applicable law been quoted or explained in its entirety, this Court never would have issued such an order.⁹

As the *Order for Debtor's Examination* is contrary to NRS 21.270 in the first place, Mr. Zandian should not be held in contempt for a failure to comply with the requirements of that order, insofar as it required to personally present himself in Carson City, Nevada for examination. For this reason, this Court should deny the *Motion*.

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property' at an examination either before 1) the judge or master appointed by the judge or 2) an attorney representing the judgment creditor. NRS 21.270(1)⁹).

⁹ To be fair, the fact that the *Motion for Judgment Debtor Examination and to Produce Documents* was unopposed by then-counsel for Reza Zandian bears a fair share of the responsibility for the oversight. The invalidity of the order subjecting Mr. Zandian to a debtor's examination should have been presented to this Court in the context of an opposition. Nonetheless, the failure to respond does not expand the scope of this Court's lawful authority beyond that which is authorized. In other words, the law is what the law is.

1 **B. Reza Zandian should not be held in contempt for failing to**
2 **comply with a requirement reducing by half his time to respond**
3 **to an ordered document production.**

4 Next, Plaintiff complains that Mr. Zandian failed to comply with this Court's
5 *Order for Debtor's Examination* "by failing to produce the documents one week prior to
6 the debtor's examination."¹⁰ Once again, Plaintiff takes generous—and unauthorized—
7 liberties with the procedural regulation of supplementary proceedings in aid of
8 judgment execution.

9 NRCPC 69(a) provides:

10 (a) *In general.* Process to enforce a judgment for the payment of money shall
11 be a writ of execution, unless the court directs otherwise. The procedure on
12 execution, in proceedings supplementary to and in aid of a judgment, and in
13 proceedings on and in aid of execution shall be in accordance with the practice
14 and procedure of the State. ***In aid of the judgment or execution, the***
15 ***judgment creditor*** or a successor in interest when that interest appears of
16 record, ***may obtain discovery from any person, including the***
17 ***judgment debtor, in the manner provided in these rules.***

18 (Emphasis added).

19 The emphasized language permits Plaintiff, as the judgment creditor, to utilize
20 the discovery techniques set forth in the Nevada Rules of Civil Procedure. As such, the
21 *Order for Debtor's Examination*, insofar as it required the production of documents by
22 Reza Zandian, is sound. However, the term "in the manner provided in these rules" is
23 more than an authorization. It is also a limitation. That is, the language authorizes the
24 use of discovery techniques, but requires them to be exercised in accordance with the
25 Nevada Rules of Civil Procedure.

26 The production of documents is governed by NRCPC 34. Under that rule, a party,
27 in this case Reza Zandian, would be allowed 30 days to serve a written response to a

28 And the failure to present an accurate statement of the law in a timely fashion, while regrettable in this
29 instance, does not change the lawful authority—and limitations thereon—of this Court.

30 ¹⁰ See *Motion* at 8:20-21.

1 request for the production of documents.¹¹ Applied in the context of this case, 30 days
2 from service of the *Order for Debtor's Examination* would have required the document
3 disclosure by February 18, 2014.¹² Of course, Reza Zandian's time for production was
4 drastically reduced from that to February 4, 2014. The result was a requirement that
5 Reza Zandian produce 11 categories of documents, several of which required 85 months
6 of information, within two weeks—half of the time allotted for a “normal” document
7 production.¹³

8 Of course, this Court has the authority to compel a shorter or allow a longer time
9 than 30 days to produce documents in accordance with NRC 34.¹⁴ And while Plaintiff
10 may contend that this authority was invoked by the Court in its *Order for Debtor's*
11 *Examination*, the contention seems dubious for two reasons. First, Plaintiff's *Motion*
12 *for Judgment Debtor Examination and to Produce Documents* includes no discussion
13 supporting a request to shorten the time for production. And, second, there is, in fact,
14 no urgency to limit the time frame for the production of the requested documents. The
15 judgment in this case has existed for quite some time prior to the request for
16 supplementary proceedings. In regard to that judgment, the interests of Plaintiff are
17 protected from fraudulent transfers by Chapter 112 of Nevada Revised Statutes. Other
18 than Plaintiff's yearn to expedite execution—shared by nearly all judgment creditors
19 throughout history—there is no meaningful reason to reduce by half the opportunity for
20

21 ¹¹ See NRC 34(b) (“The party upon whom the request is served shall serve a written response within 30
days after the service of the request.”)

22 ¹² See NRC 6.

23 ¹³ Again, it must be conceded that it would have been far better to present this position in the context of an
opposition to the *Motion for Judgment Debtor Examination and to Produce Documents*. But be that as it
24 may, counsel for Reza Zandian did alert Plaintiff's counsel in advance that it would not be possible to
comply with the order's production requirement “due to the short amount of time provided.” Exhibit 2 to
Motion.

¹⁴ NRC 34(b) (“A shorter or longer time may be directed by the court....”)

1 Reza Zandian to respond to the expansive request set forth in the Order for Debtor's
2 Examination.

3 These circumstances do not warrant a determination that Reza Zandian is in
4 contempt of this Court or that the sanctions which Plaintiff requests should be imposed.
5 For this reason, this Court should deny the Motion at this time.

6 **III. Conclusion**

7 For these reasons, it is respectfully requested that this Court enter an order
8 denying the Motion.

9 DATED this 3rd day of March, 2014.

10 KAEMPFER CROWELL

11
12 BY: 

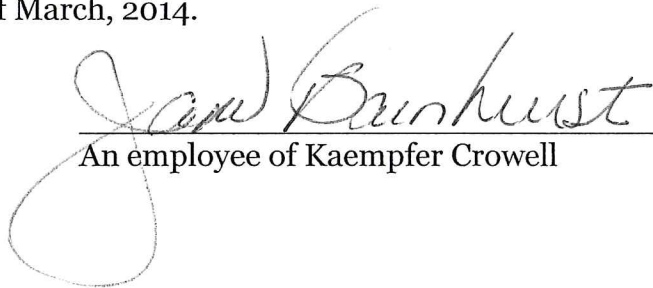
13 JASON D. WOODBURY
14 Nevada Bar No. 6870
15 SEVERIN A. CARLSON
16 Nevada Bar No. 9373
17 KAEMPFER CROWELL
18 510 West Fourth Street
19 Carson City, Nevada 89703
20 Telephone: (775) 884-8300
21 Facsimile: (775) 882-0257
22 e-mail: jwoodbury@kcnvlaw.com
23 scarlson@kcnvlaw.com
24 Attorneys for **Defendant, REZA ZANDIAN**

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRCP 5(b), I hereby certify that service of the foregoing
3 **OPPOSITION TO MOTION FOR ORDER TO SHOW CAUSE REGARDING**
4 **CONTEMPT** was made this date by depositing a true and correct copy of the document
5 in the United States mail, postage pre-paid at Carson City, Nevada, addressed to:

6 Matthew D. Francis
7 Adam P. McMillen
8 WATSON ROUNDS
9 5371 Kietzke Lane
10 Reno, NV 89511
11 *Attorneys for Plaintiff Jed Margolin*

12 DATED this 3rd day of March, 2014.

13 
14 _____
15 An employee of Kaempfer Crowell

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

Defendants.

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

**Case No. 09 OC 00579 1B
Dept. No. I**

**EXHIBIT INDEX
to
Opposition Motion for Order to Show Cause Regarding Contempt**

Exhibit No.	Description of Exhibit	Exhibit Pages
1	<i>Affidavit of Reza Zandian in Support of Motion to Set Aside Default Judgment (Jan. 17, 2014)</i>	2
2	<i>Notice of Appeal (Mar. 15, 2013)</i>	2
3	<i>Notice of Entry of Order Granting Plaintiff's Motion for Debtor Examination and to Produce Documents (Jan. 16, 2014)</i>	8


EXHIBIT 1

EXHIBIT 1

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

Executed this 17 day of January, 2014.


REZA ZANDIAN

Subscribed and Sworn to before me this 17 day of January, 2014.

CAROLINE AL TAWIL
Conseillère de Clientèle
Agence Paris Passy

Notary Public in and for Said State and County

(SEAL)

HAWKINS MELENDEZ, F.C.
9555 Hillwood Drive, Suite 150
Las Vegas, Nevada 89134
Telephone (702) 318-8800 • Facsimile (702) 318-8801

EXHIBIT 2

EXHIBIT 2

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CLERK OF THE COURT

1 NOAS
2 REZA ZANDIAN
3 6, rue Edouard Fournier
4 75116 Paris, France
5 Pro Per Appellant

6
7 DISTRICT COURT
8 CLARK COUNTY, NEVADA

9 GHOLAMREZA ZANDIAN JAZI, also
10 known as REZA ZANDIAN, individually,

CASE NO.: A-11-635430-C
DEPT. NO.: IV

11 Plaintiff,

12 v.

13 FIRST AMERICAN TITLE COMPANY, a
14 Nevada business entity; JOHNSON SPRING
15 WATER COMPANY, LLC, formerly known
16 as BIG SPRING RANCH, LLC, a Nevada
17 Limited Liability Company, FRED SADRI,
18 Trustee of the Star Living Trust, RAY
19 KOROGHLI, individually, and ELIAS
20 ABRISHAMI, individually,

21 Defendants.

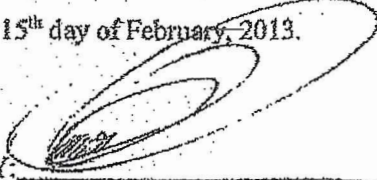
22 AND ALL RELATED COUNTERCLAIMS
23 AND THIRD-PARTY CLAIMS

24 1334.024072-td

25 NOTICE OF APPEAL

26 Notice is hereby given that REZA ZANDIAN a member of the above named company,
27 hereby appeals to the Supreme Court of Nevada from the Order to Distribute Attorney Fee and Costs
28 Awards to Defendants entered in this action on the 15th day of February, 2013.

DATED this 15th day of March, 2013.

29 BY: 
30 REZA ZANDIAN
31 6, rue Edouard Fournier
32 75116 Paris, France
33 Pro Per Appellant

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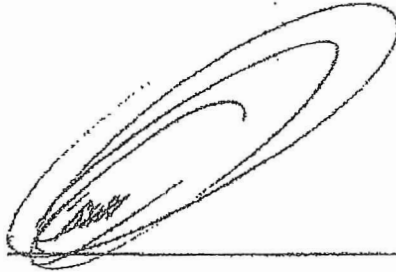
CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the ___ day of March, 2013, I served a copy of the above and foregoing NOTICE OF APPEAL, upon the appropriate parties hereto, by enclosing it in a sealed envelope, deposited in the United States mail, upon which first class postage was fully prepaid addressed to:

Stanley W. Parry
100 North City Parkway, Ste. 1750
Las Vegas, Nevada 89106

Elias Abrishami
P.O. Box 10476
Beverly Hills, California 90213

Ryan E. Johnson, Esq.
Watson & Rounds
777 North Rainbow Blvd. Ste. 350
Las Vegas, Nevada 89107



A handwritten signature in dark ink, appearing to read 'R. Johnson', is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

EXHIBIT 3

EXHIBIT 3

13314.1
~~PLAINT~~
GWH

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

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

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 Companies
18 1-10, DOE Corporations 11-20, and DOE
19 Individuals 21-30,
20 Defendants.

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

**NOTICE OF ENTRY OF ORDER
GRANTING PLAINTIFF'S MOTION
FOR DEBTOR EXAMINATION AND
TO PRODUCE DOCUMENTS**

21 TO: All parties:

22 **PLEASE TAKE NOTICE** that on January 13, 2014 the Court entered its Order
23 Granting Plaintiff's Motion for Debtor Examination and to Produce Documents. Attached as
24 Exhibit 1 is a true and correct copy of the Order Granting Plaintiff's Motion for Debtor
25 Examination and to Produce Documents.

26 **Affirmation Pursuant to NRS 239B.030**

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

DATED: January 16, 2014.

WATSON ROUNDS

By: Adam P. McMillen

Matthew D. Francis
Adam P. McMillen
Watson Rounds
5371 Kietzke Lane
Reno, NV 89511

Attorneys for Plaintiff Jed Margolin

1 **CERTIFICATE OF SERVICE**

2 Pursuant to NRC 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, NOTICE OF ENTRY OF ORDER GRANTING
5 PLAINTIFF'S MOTION FOR DEBTOR EXAMINATION AND TO PRODUCE
6 DOCUMENTS, addressed as follows:

7 Optima Technology Corp.
8 A California corporation
9 8401 Bonita Downs Road
Fair Oaks, CA 95628

10 Optima Technology Corp.
11 A Nevada corporation
12 8401 Bonita Downs Road
Fair Oaks, CA 95628

13 Optima Technology Corp.
14 A California corporation
15 8775 Costa Verde Blvd. #501
San Diego, CA 92122

16 Optima Technology Corp.
17 A Nevada corporation
18 8775 Costa Verde Blvd. #501
San Diego, CA 92122

19 Johnathon Fayeghi, Esq.
20 Hawkins Melendrez
21 9555 Hillwood Dr., Suite 150
Las Vegas, NV 89134
Counsel for Reza Zandian

22 Dated: This 16th day of January, 2014.

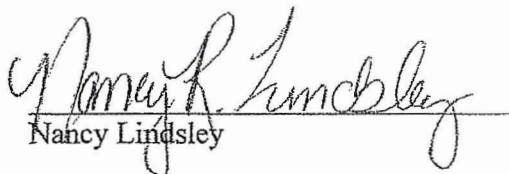
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24 Nancy Lindsley
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Exhibit 1

Exhibit 1

1 Case No. 09 0C 00579 1B

2 Dept. No. I

REC'D & FILED

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ALAN GLOVER

G. Cooper

5 In The First Judicial District Court of the State of Nevada

6 In and for Carson City

7 JED MARGOLIN, an individual,

8 Plaintiff,

9 vs.

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

21 Defendants.

~~PROPOSED~~ ORDER GRANTING
PLAINTIFF'S MOTION FOR
DEBTOR EXAMINATION AND
TO PRODUCE DOCUMENTS

19 This matter comes before the Court on Plaintiff JED MARGOLIN's Motion for Debtor
20 Examination and to Produce Documents, filed on December 11, 2013.

21 The Court finds that Defendants have not opposed the Motion for Debtor Examination
22 and to Produce Documents. The non-opposition by Defendants to Plaintiff's Motion constitutes
23 a consent to the granting of the motion.

24 The Court finds good cause exists to grant Plaintiff's Motion for Debtor Examination
25 and to Produce Documents.

26 ///

27 ///

28 ///

1 NOW, THEREFORE, **IT HEREBY IS ORDERED** as follows:

2 1. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
3 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
4 GHONONREZA ZANDIAN JAZI is hereby ordered to appear before the Court and answer
5 upon oath or affirmation concerning Defendant's property at a Judgment Debtor Examination
6 under the authority of a Judge of the Court on the following date February 11, 2014 @ 9:00 AM; and,

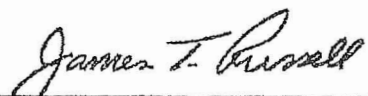
7 2. That Defendant REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI
8 aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka
9 GHONONREZA ZANDIAN JAZI is hereby ordered to produce to Mr. Margolin's counsel at
10 least one week prior to the Judgment Debtor Examination, so that counsel may effectively
11 review and question Zandian regarding the documents, all information and documents
12 identifying, related to, and/or comprising the following:

- 13
- 14 a. Any and all information and documentation identifying real property, computers,
15 cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and
16 all other assets that may be available for execution to satisfy the Judgment entered
17 by the Court, including, but not limited to, information relating to financial
18 accounts, monies owed to Zandian by others, etc.
 - 19 b. Documents sufficient to show Zandian's balance sheet for each month for the years
20 2007 to the present.
 - 21 c. Documents sufficient to show Zandian's gross revenues for each month for the
22 years 2007 to the present.
 - 23 d. Documents sufficient to show Zandian's costs and expenses for each month for the
24 years 2007 to the present.
 - 25 e. All tax returns filed by Zandian with any governmental body for the years 2007 to
26 the present, including all schedules, W-2's and 1099's.
- 27
28

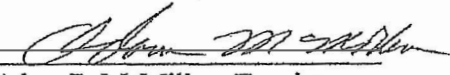
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- f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2007 to the present.
- g. All of Zandian's statements, cancelled checks and related banking documents for any bank, brokerage or other financial account at least partially controlled by Zandian, or recorded in the name of Zandian or for Zandian's benefit, for the years 2007 to the present.
- h. All of Zandian's checkbooks, checkbook stubs and checkbook entries for the years 2007 to the present.
- i. Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence for the years 2007 to the present.
- j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter.
- k. Any settlement agreements by which another party has agreed to pay money to Zandian.

DATED: This 13th day of January, 2014.



JAMES T. RUSSELL
DISTRICT COURT JUDGE

Respectfully submitted by,
WATSON ROUNDS, P.C.
By: 
Adam P. McMillen, Esquire
Nevada Bar No. 10678
5371 Kietzke Lane
Reno, NV 89511
Telephone: (775) 324-4100
Facsimile: (775) 333-8171
Email: amcmillen@watsonrounds.com
Attorney for Plaintiff

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, *Proposed Order Granting Motion for Debtor*
5 *Examination and for Production of Documents*, addressed as follows:

6 Geoffrey W. Hawkins, Esquire
7 Johnathon Fayeghi, Esquire
8 Hawkins Melendrez, P.C.
9 9555 Hillwood Drive, Suite 150
10 Las Vegas, Nevada 89134

11 Alborz Zandian
12 9 Almanzora
13 Newport Beach, CA 92657-1613

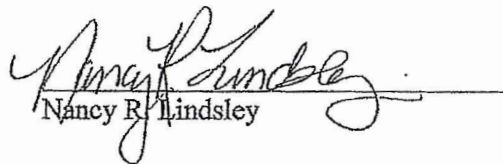
14 Optima Technology Corp.
15 A California corporation
16 8401 Bonita Downs Road
17 Fair Oaks, CA 95628

18 Optima Technology Corp.
19 A Nevada corporation
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21 Fair Oaks, CA 95628

22 Optima Technology Corp.
23 A California corporation
24 8775 Costa Verde Blvd. #501
25 San Diego, CA 92122

26 Optima Technology Corp.
27 A Nevada corporation
28 8775 Costa Verde Blvd. #501
San Diego, CA 92122

Dated: January 9th, 2014


Nancy R. Lindsley