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Case No.

09 0C 00579 1B

JED MARGOLIN, an individual,

a California corporation, OPTIMA

corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI

aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI

aka G. REZA JAZI aka GHONONREZA

1-10, DOE Corporations 11-20, and DOE

Defendants.

ZANDIAN JAZI, an individual, DOE Companies

Plaintiff,

OPTIMA TECHNOLOGY CORPORATION,

TECHNOLOGY CORPORATION, a Nevada

Dept. No. Ι

VS.

Individuals 21-30.

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

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

This matter comes before the Court on Plaintiff Jed Margolin's Motion for Debtor Examination and to Produce Documents, filed on June 10, 2015. On June 29, 2015, Defendant Reza Zandian filed an Opposition and a Motion for Protective Order. On July 10, 2015, Plaintiff filed a Reply in Support of the Motion for Debtor Examination and to Produce Documents and an Opposition to Defendant's Motion for Protective Order. On July 20, 2015, Defendant filed his Reply in Support of the Motion for Protective Order. On November 5, 2015, the Court held oral argument on the motions.

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After considering the motions, oppositions, replies, oral argument and the papers and pleadings on file herein, for good cause appearing, the Court hereby grants the Motion for Debtor's Examination and to Produce Documents.

The Court finds that when Defendants' former attorney, John Peter Lee, withdrew from this matter he provided a last known address for Defendant Zandian in San Diego, California.

Based upon this fact and other evidence in the record, the Court finds San Diego, California, is an appropriate location for the debtor's examination of Defendant Reza Zandian.

NOW, THEREFORE, IT HEREBY IS ORDERED as follows:

- 1. That Defendant Reza Zandian is hereby ordered to appear in San Diego, California, during the month of February 2016 and answer upon oath or affirmation concerning his property at a Judgment Debtor Examination, with the specific location in San Diego to be chosen by Plaintiff; and
- 2. That Defendant Reza Zandian is hereby ordered to produce to Plaintiff's counsel on or before December 21, 2015, all of the following information and documents identifying, related to, and/or comprising the following:
 - a. Any and all information and documentation identifying real property, computers, cell phones, intellectual property, vehicles, brokerage accounts, bank deposits and all other assets that may be currently available for execution to satisfy the Judgments entered by the Court, including, but not limited to, information relating to financial accounts, monies owed to Defendant Zandian by others, etc.
 - b. Documents sufficient to show Zandian's balance sheet for each month from
 December 11, 2009 (the date the original complaint was filed) to the present.
 - Documents sufficient to show Zandian's gross revenues for each month from
 December 11, 2009 to the present.

- d. Documents sufficient to show Zandian's costs and expenses for each month from
 December 11, 2009 to the present.
- e. All tax returns filed by Zandian with any governmental body for the years 2010 to the present, including all schedules, W-2's and 1099's.
- f. All of Zandian's accounting records, computerized electronic and/or printed on paper format for the years 2010 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, from December 11, 2009 to the present.
- h. All of Zandian's checkbooks, checkbook stubs and checkbook entries from December 11, 2009 to the present.
- Documents sufficient to show the means and source of payment of Zandian's current residence and any other residence from December 11, 2009 to the present.
- j. Documents sufficient to show the means and source of payment of Zandian's counsel in this matter from December 11, 2009 to the present.
- k. Any settlement agreements by which another party has agreed to pay money to Zandian from December 11, 2009.

DATED: This 644 day of November, 2015.

JAMES 1. KUSSELL -DISTRICT COURT JUDGE

CERTIFICATE OF MAILING

The undersigned, an employee of the First Judicial District Court, hereby certifies that on the day of November, 2015, I served a copy of the foregoing Order by United States Mail, postage prepaid, addressed as follows:

Adam P. McMillen, Esq. 5371 Kietzke Lane Reno, NV 89511

Severin A. Carlson, Esq. Tara C. Zimmerman, Esq. 510 West Fourth Street Carson City, NV 89703

> Angela Jeffries Judicial Assistant, Dept. 1