

**IN THE SUPREME COURT OF THE STATE OF NEVADA**

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

Appellant,

vs.

JED MARGOLIN, AN INDIVIDUAL,

Respondent.

**Nevada Supreme Court  
Case No. 65205**

**APPEAL**

from the FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA  
IN AND FOR CARSON CITY  
THE HONORABLE JAMES T. RUSSELL, District Judge

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**JOINT APPENDIX**

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**VOLUME I**

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510 West Fourth Street  
Las Vegas, Nevada 89703  
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*Attorneys for Appellant, Reza Zandian*

**ALPHABETICAL INDEX TO JOINT APPENDIX (“J.A.”)**

***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,  
Appellant,***

***vs.***

***JED MARGOLIN, an individual,  
Respondent.***

**Nevada Supreme Court Case Number: 65205**

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<b><u>DOCUMENT</u></b>	<b><u>DATE</u></b>	<b><u>VOL.</u></b>	<b><u>PAGES (J.A.)</u></b>
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<b><u>DOCUMENT</u></b>	<b><u>DATE</u></b>	<b><u>VOL.</u></b>	<b><u>PAGES (J.A.)</u></b>
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<b><u>DOCUMENT</u></b>	<b><u>DATE</u></b>	<b><u>VOL.</u></b>	<b><u>PAGES (J.A.)</u></b>
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<i>Order Granting Plaintiff's Motion to Compel Appearance of Counsel for Optima Technology Corporations or in the alternative, Motion to Strike General Denial of Optima Technology Corporations</i>	June 28, 2012	II	334-337
<i>Order Setting Aside Default, Denying Motion to Dismiss and Granting Extension of Time for Service</i>	Aug. 3, 2011	I	165-168
<i>Plaintiff's Application for Attorney's Fees and Costs</i>	Feb. 20, 2013	III	429-433

<b><u>DOCUMENT</u></b>	<b><u>DATE</u></b>	<b><u>VOL.</u></b>	<b><u>PAGES (J.A.)</u></b>
<i>Plaintiff's Motion for Sanctions Under NRC 37</i>	Dec. 14, 2012	II	383-389
<i>Plaintiff's Motion to Compel Appearance of Counsel for Optima Technology or in the alternative, Motion to Strike General Denial of Optima Technology Corporations</i>	May 15, 2012	II	329-333
<i>Reply to Opposition to Motion to Dismiss on a Special Appearance</i>	July 5, 2011	I	161-164
<i>Request for Submission and Hearing on Defendant Reza Zandian's Motion to Set Aside Default Judgment</i>	Jan. 23, 2014	IV	662-664
<i>Summons</i>	Mar. 9, 2010	I	11-14
<i>Summons on Amended Complaint</i>	Nov. 7, 2011	I	177-181

1 Case No.: 09 OC 00579 IB

2 Dept. No.: I

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6 **IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**  
7 **IN AND FOR CARSON CITY**

8 JED MARGOLIN, an individual,

9  
10 Plaintiff,

11 vs.

12 OPTIMA TECHNOLOGY  
13 CORPORATION, a California corporation,  
14 OPTIMA TECHNOLOGY CORPORATION,  
15 a Nevada corporation, REZA ZANDIAN aka  
16 GOLAMREZA ZANDIANJAZI aka  
17 GHOLAM REZA ZANDIAN aka REZA  
18 JAZI aka J. REZA JAZI aka G. REZA  
19 JAZI aka GHONONREZA ZANDIAN JAZI,  
20 an individual, DOE Companies 1-10, DOE  
21 Corporations 11-20, and DOE Individuals  
22 21-30,

23 Defendants.

24  
25  
26 **COMPLAINT**

(Exemption From Arbitration Requested)

27 Plaintiff, JED MARGOLIN ("Mr. Margolin"), by and through his counsel of record,  
28 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 7. Pursuant to the Nevada Constitution, Article 6, Section 6, the district courts of the  
24 State of Nevada have original jurisdiction in all cases excluded by law from the original  
25 jurisdiction of the justice courts. This case involves tort claims in an amount in excess of the  
26 jurisdictional limitation of the justice courts and, accordingly, jurisdiction is proper in the district  
27 court.  
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WHEREFORE, Plaintiff Jed Margolin, prays for judgment against the Defendants as follows:

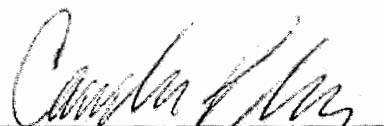
1. That Plaintiff be awarded damages for Defendants' tortious conduct;
2. That Plaintiff be awarded damages for Defendants' unjust enrichment;
3. That Plaintiff be awarded damages for Defendants' commission of unfair and deceptive trade practices, in an amount to be proven at trial, with said damages 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*



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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

UNIVERSAL AVIONICS SYSTEMS CORPORATION,

Plaintiff,

vs.

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

Defendants.

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

Counterclaimant,

vs.

UNIVERSAL AVIONICS SYSTEMS CORPORATION, an Arizona corporation,

Counterdefendant,

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

Cross-Claimant,

vs.

OPTIMA TECHNOLOGY CORPORATION,

Cross-Defendant.

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 18<sup>th</sup> day of August, 2008.

20  
21  
22  


23 Raner C. Collins  
24 United States District Judge

**COPY**

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2010 MAR -9 PM 2:15  
ALAN GLOVER  
BY J. HARKLEROAD  
DEPUTY

No. 090C00579 1B  
Dept. I

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

**SUMMONS**

JED MARGOLIN, an individual  
Plaintiff,


<sup>VS</sup>  
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, 2009

\*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 22<sup>ND</sup> day of JANUARY, 20 10, and personally served the same upon REZA ZANDIAN the within named defendant, on the 2<sup>ND</sup> 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 12<sup>TH</sup> 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.  
2 Case No. 090C00579 IB  
3 Declaration of Robert Toth

4 I, ROBERT TOTH, hereby declare:

5 I am a registered process server for the State of California. I have personal knowledge of  
6 the facts contained in this Declaration, and if called as a witness, I could and would competently  
7 testify thereto. As to those matters alleged on information and belief, I believe them to be true.

8 I served copies of the Summons and Complaint, on Reza Zandian aka Golamreza  
9 Zandianjaza, aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka  
10 Ghononreza Zanian Jazi:

11 On January 26, 2010 at 8:43 a.m., I went to the residence address at 8401 Bonita Downs  
12 Road, Fair Oaks, California 95628. There was no answer at the door.

13 On January 28, 2010 at 3:47 p.m., I returned to the residence again, and there was no  
14 answer at the door.

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

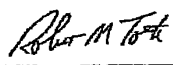
17 On February 2, 2010 at 5:37 p.m., when I returned to the residence address, I observed no  
18 lights on, no cars parked, but that the trash was set out.

19 On February 2, 2010 at 7:21 p.m., I returned to the residence address. The door was  
20 answered by an elderly man, described as mid to late-60's, middle eastern accent, 5'4" tall, grey  
21 hair, long beard, thin, and wearing glasses. I told him I was looking for Reza. I showed him the  
22 name on the documents with the various names, and made a motion that he knew one or more of  
23 the names. I showed him the photograph that I had. I told him I had legal documents for Reza,  
24 and that I would leave it with him. He took the envelope, opened it and saw the documents. He  
25 told me that he did not want the papers and that he did not live there. I told him that we had  
26 confirmed that was his address. He returned the envelope back. I told him that he needed to  
27 make sure that Reza got the paperwork. I put the envelope by the doorway. He picked up the  
28 envelope and threw it at me as I was leaving. I left the documents there and again told him that  
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 18<sup>th</sup> day of February, at Citrus Heights, California.

  
\_\_\_\_\_  
ROBERT M. TOTH  
Registered Process Server

6/8/11

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2011 JUN -9 PM 2:40

BY *[Signature]* CLERK  
DEPUTY

1 **MOT**  
 2 **JOHN PETER LEE, LTD.**  
 3 **JOHN PETER LEE, ESQ.**  
 4 Nevada Bar No. 001768  
 5 **JOHN C. COURTNEY, ESQ.**  
 6 Nevada Bar No. 011092  
 7 830 Las Vegas Boulevard South  
 8 Las Vegas, Nevada 89101  
 9 (702) 382-4044 Fax: (702) 383-9950  
 10 e-mail: [info@johnpeterlee.com](mailto:info@johnpeterlee.com)  
 11 Attorneys for Defendant Reza Zandian

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

10 JED MARGOLIN, an individual;  
 11  
 12 Plaintiff,  
 13  
 14 vs.

Case No.: 090C00579  
 Dept. No.: I

15 **OPTIMA TECHNOLOGY CORPORATION,**  
 16 a California corporation, **OPTIMA**  
 17 **TECHNOLOGY CORPORATION,** a Nevada  
 18 coporation, **REZA ZANDIAN** aka  
 19 **GOLAMREZA**  
 20 **ZANDIANJAZI** aka **GHOLAM REZA**  
 21 **ZANDIAN**  
 22 aka **REZA JAZI** aka **J. REZA JAZI** AKA **G. REZA**  
 23 **JAZI** aka **GHONONREZA ZANDIAN JAZI,**  
 24 an individual, **DOE Companites**  
 25 **1-10; DOE Corporations 11-20, and DOE**  
 26 **Individuals 21-30,**  
 27  
 28 Defendants.

**MOTION TO DISMISS**  
**ON A SPECIAL**  
**APPEARANCE**

**JOHN PETER LEE, LTD.**  
 ATTORNEYS AT LAW  
 830 LAS VEGAS BLVD. SOUTH  
 LAS VEGAS, NEVADA 89101  
 Telephone (702) 382-4044  
 Telecopier (702) 383-9950

1334.023382-tam

21 COMES NOW Defendant Reza Zandian by and through his counsel John Peter Lee, Ltd.,  
 22 and hereby files its MOTION TO DISMISS ON A SPECIAL APPEARANCE.

23 This Motion is made and based upon all of the pleadings and papers on file herein, exhibits  
 24 attached hereto, the attached Memorandum of Points and Authorities, and oral argument, if required  
 25 by the Court.

26 ...  
 27 ...  
 28 ...

JOHN PETER LEE, LTD.  
ATTORNEYS AT LAW  
830 LAS VEGAS BLVD. SOUTH  
LAS VEGAS, NEVADA 89101  
Telephone (702) 382-4044  
Telecopier (702) 383-9950

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I.**

3 **ZANDIAN IS BEFORE THIS COURT ON A SPECIAL APPEARANCE.**

4 The Nevada Supreme Court has held that "general appearance is entered when a person (or  
5 the person's attorney) comes into court as a party to a suit and submits to the jurisdiction of the  
6 court." Milton v. Gesler, 107 Nev. 767, 769, 819 P.2d 245, 247 (1991). "A special appearance is  
7 entered when a person comes into court to test the court's jurisdiction or the sufficiency of service."  
8 Id. "Black's law dictionary defines a general appearance as a 'simple and unqualified. . . submission  
9 to the jurisdiction of the court' and defines a special appearance as an appearance 'for the purpose  
10 of testing the sufficiency of service or the jurisdiction of the court.'" Id. at fn. 3 (citing Black's Law  
11 Dictionary 89 (5th ed. 1979)).

12 Defendant Golanreza Zandianjazi (hereinafter "Zandian") hereby makes a special appearance  
13 in this case for the purpose of testing both the sufficiency of service and the jurisdiction of the court;  
14 thus, Zandian has not consented to personal jurisdiction of any Nevada court by bringing the instant  
15 motion.

16 **II.**

17 **STATEMENT OF FACTS**

18 Universal Avionics Systems Corporation as Plaintiff filed an action in the United States  
19 District Court of Arizona (Tucson Division) under case number 4:07-cv-00588-RCC on November  
20 9, 2007. A copy of the docket for that case is attached hereto as Exhibit "A".

21 On August 18, 2008, an order was entered, a copy of which is attached as Exhibit "B". With  
22 regard to the U.S. District Court action, neither the underlying complaint, nor the order, nor the  
23 docket carry the name of Reza Zandian (hereinafter "Zandian"). Accordingly, Zandian, as an  
24 individual, was never served with a complaint in that action. Jed Margolin (hereinafter "Margolin")  
25 is named as a defendant in the U.S. District Court action in Arizona. Exhibits "A" & "B".

26 Margolin filed a complaint with the First Judicial District Court of the State of Nevada in and  
27 for Cason City on December, 11, 2009 (hereinafter "Nevada Complaint"), a copy of which is  
28 attached as Exhibit "C". The Nevada Complaint names Zandian as a defendant and alleges that

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1 Zandian resides in San Diego, California or Las Vegas, Nevada. *Id.* at ¶ 4. Although Margolin  
2 alleged that Zandian resides in Las Vegas or San Diego, Margolin did not attempt service on Zandian  
3 in said places of alleged residence, but instead attempted service on Zandian in an entirely different  
4 city, Fair Oaks, California. Exhibit "D". Accordingly, Zandian was never served in this case either.

5 In the Nevada Complaint, paragraph 17, Margolin alleges to have filed a cross-claim for  
6 declaratory relief against Zandian in the U.S. District Court action. *Id.* In Paragraph 18 of the  
7 Complaint, Margolin alleges that an entry of a judgment in favor of Margolin was entered in that  
8 action. *Id.* The judgment, however, was not against Zandian. See Exhibits "A" & "B". A copy of  
9 the order is attached to the Nevada Complaint, and it does not name Zandian as a defendant against  
10 whom any rights were formulated. Exhibit "B".

11 In the Nevada Complaint, Margolin wrongfully and fraudulently states that Zandian was a  
12 resident of Nevada, that he was sued in Arizona before the U.S. District Court, that a judgment was  
13 entered there against him and that the Nevada Complaint is filed in an attempt to domesticate the  
14 U.S. District Court judgment issued in Arizona. See Exhibits "A" through "C". Thus, Margolin  
15 attached to the Nevada Complaint the only evidence necessary to determine whether Margolin  
16 committed a fraud upon the court by naming Zandian in the Carson City action. *Id.*

17 Zandian hereby alleges that in addition to his residency, which was at all times in California,  
18 there is no judgment in existence against Zandian filed in Arizona. *Id.* He was not served with a  
19 summons and complaint in the U.S. District Court case, a summons and complaint in the instant  
20 action, he was not served with a 3-Day Notice of Intent to Take Default Judgment in the instant  
21 action, nor was he served with the Notice of Entry of Default filed on December 2, 2010 in the  
22 instant action. *Id.* The Application for Default Judgments against the defendants named in the  
23 Nevada Complaint was served by mail upon John Peter Lee, Ltd., although John Peter Lee, Ltd., did  
24 not appear in the Carson City proceeding. Neither did Zandian.

25 In support of the Default Judgment, Margolin, the Plaintiff, filed Points and Authorities, but  
26 did not indicate the basis for the enforcement of a judgment by default against Zandian. Again,  
27 Zandian was not served with a copy of the Nevada Complaint or the U.S. District Court complaint  
28 which forms the basis for the Nevada Complaint. *Id.*

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III .

**LEGAL ANALYSIS**

**A. Service of the Summons and Complaint was Never Effectuated Upon Zandian.**

Proper service of a summons and complaint upon an individual must be made upon the individual "defendant personally, or by leaving copies thereof at the defendant's dwelling house or usual place of abode with some person of suitable age and discretion then residing therein, or by delivering a copy of the summons and complaint to an agent authorized by appointment or by law to receive service of process." NRC P 4(d)(6). Pursuant to NRC P 12(b)(4), insufficiency of service of process is grounds to dismiss a complaint.

Zandian was not served a summons and complaint in the U.S. District Court action which forms the basis of the instant action. Exhibit "A". Zandian is not mentioned in the Order issued from the U.S. District Court. Exhibits "A" & "B". Zandian was not served a summons and complaint in the instant action. Notwithstanding, Plaintiff took a default judgment against Zandian.

Because no summons was ever issued as to Zandian in the underlying U.S. District Court action which forms the basis of the instant action, any domestication of the U.S. District Court action as it pertains to Zandian is a clear violation of Zandian's constitutional right to notice under the Due Process Clauses of the Fifth and Fourteenth Amendments of the U.S. Constitution. Additionally, Zandian was not served in the instant case, in furtherance of the deprivation of Zandian's right to due process.

Because Zandian has never been given notice as required by NRC P 4 and/or the U.S. Constitution, the default judgment as applied to Zandian must be set aside pursuant to NRC P 55(c) or 60(b), and Zandian be dismissed from the instant action upon this instant motion by special appearance.

**B. Nevada Does Not Have Personal Jurisdiction Over Zandian in the Instant Action.**

"The plaintiff bears the burden of producing *some* evidence in support of all facts necessary to establish personal jurisdiction [emphasis added]." Trump v. District Court, 109 Nev. 687, 692-93,

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1 857 p.2d 740, 748 (1993). Here, while Plaintiff did allege that Zandian resided in either San Diego  
2 or Las Vegas, Plaintiff did not even attempt to serve Zandian in his alleged places of residence,  
3 which ought to serve as the only evidence that the court needs to determine that the allegation that  
4 Zandian resides in Las Vegas was nothing more than a fraud upon the court to induce the court into  
5 exercising personal jurisdiction over Zandian.

6 "There are two types of personal jurisdiction: general and specific." Trump v. District Court,  
7 109 Nev. 687,699, 857 p.2d 740, 748 (1993). "General jurisdiction over the defendant 'is  
8 appropriate where the defendant's forum activities are so 'substantial' or continuous and systematic'  
9 that it may be deemed present in the forum.'" Id.; see also Baker v. Eighth Jud. Dist. Ct., 116 Nev.  
10 527, 531-31, 999 P.2d 1020, 1023 (2000) (holding that "membership in the state bar, in and of itself,  
11 does not subject an individual to general jurisdiction in the state of membership because such contact  
12 is not substantial, continuous, or systematic."). In this case, Plaintiff has not alleged that Zandian  
13 has ever had any "forum activities" in Nevada. Thus, without more, Nevada cannot exercise general  
14 personal jurisdiction over Zandian.

15 "Specific personal jurisdiction over a defendant may be established only where the cause of  
16 action arises from the defendant's contacts with the forum." Baker, supra. "To subject a defendant  
17 to specific jurisdiction, this court must determine if the defendant 'personally established minimum  
18 contacts' so that jurisdiction would 'comport with fair play and substantive justice [internal  
19 quotations omitted].'" Id. (citing Burger King Corp. V. Rudzewicz, 471 U.S. 462, 476-77, 85 L. Ed.  
20 2d 528, 105 S. Ct. 2174 (1985) (quoting International Shoe Co. v. Washington, 326 U.S. 310, 320,  
21 90 L. Ed. 95, 66 S. Ct. 154 (1945)). "In order for a forum state to obtain personal jurisdiction over  
22 a nonresident defendant, the Due Process Clause of the Fourteenth Amendment requires that the  
23 defendant have 'minimum contacts' with the forum state 'such that the maintenance of the suit does  
24 not offend traditional notions of fair play and substantial justice.'" Baker, supra at 531-31. Here,  
25 Plaintiff has not alleged *any* contacts between Zandian and Nevada, except to allege that Zandian  
26 resides in either San Diego or Las Vegas, and this is simply not enough to find that the court has  
27 personal jurisdiction over Zandian.

28 ...

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1 Zandian has not consented to personal jurisdiction in Nevada. Additionally, Zandian appears  
2 now, by and through his counsel, on a limited basis to respectfully refute the court's jurisdiction over  
3 her. Because Zandian is appearing for the sole purpose of refuting the Court's jurisdiction, Zandian  
4 has neither consented to jurisdiction nor waived the lack thereof.

5 Zandian has not been alleged to reside of the State of Nevada; instead, Plaintiff ambiguously  
6 alleged that he is a resident of California *or* Nevada, then proceeded to attempt service upon him in  
7 California only. Zandian has not consented to personal jurisdiction in Nevada. Plaintiff has not  
8 alleged or produced any facts indicating that Zandian has had minimum contacts with the State of  
9 Nevada. Thus, pursuant to NRCP 12(b)(2), the Court must set aside the judgment against Zandian  
10 pursuant to NRCP 55(c) or 60(b) so that Zandian can be dismissed from the instant action on the  
11 grounds that the court does not enjoy personal jurisdiction over Zandian.

12 DATED this 8th day of June, 2011.

JOHN PETER LEE, LTD.

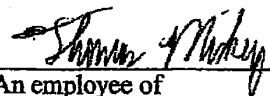
13  
14 BY: 

15 JOHN PETER LEE, ESQ.  
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16 JOHN C. COURTNEY, ESQ.  
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17 Ph: (702) 382-4044/Fax: (702) 383-9950  
18 Attorneys for Defendant Reza Zandian

19 **CERTIFICATE OF MAILING**

20 I HEREBY CERTIFY that on the 8th day of June, 2011, a copy of the foregoing MOTION  
21 TO DISMISS ON A SPECIAL APPEARANCE was served on the following parties by mailing a  
22 copy thereof, first class mail, postage prepaid, addressed to:

23 Cassandra P. Joseph, Esq.  
Watson Rounds  
24 5371 Kietzke Lane  
Reno, NV 89511

25   
26 An employee of  
JOHN PETER LEE, LTD.





CLOSED, STD

**U.S. District Court  
DISTRICT OF ARIZONA (Tucson Division)  
CIVIL DOCKET FOR CASE #: 4:07-cv-00588-RCC**

Universal Avionics Systems Corporation v. Optima  
Technology Group, Inc. et al  
Assigned to: Judge Raner C Collins  
Cause: No cause code entered

Date Filed: 11/09/2007  
Date Terminated: 09/23/2008  
Jury Demand: Both  
Nature of Suit: 190 Contract: Other  
Jurisdiction: Federal Question

**Plaintiff**

**Universal Avionics Systems  
Corporation**

represented by **Allan Andrew Kassenoff**  
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V.

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**Defendant**

**Optima Technology Corporation**  
*TERMINATED: 08/18/2008*

represented by **Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Defendant**

**Robert Adams**  
*TERMINATED: 04/09/2008*

represented by **Edward Moomjian , II**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Jeffrey Lynn Willis**  
(See above for address)

**Robert Alan Bernheim**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Defendant**

**Jed Margolin**

represented by **Edward Moomjian , II**  
(See above for address)  
*TERMINATED: 03/03/2008*  
**ATTORNEY TO BE NOTICED**

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*  
**ATTORNEY TO BE NOTICED**

**Jeffrey Lynn Willis**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Robert Alan Bernheim**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Defendant**

**Optima Technology Corporation**  
*TERMINATED: 08/18/2008*

**ThirdParty Defendant**

**Joachim L Naimer**

**ThirdParty Defendant**

**Unknown Naimer**  
*Named as Jane Doe Naimer*

**ThirdParty Defendant**

**Frank E Hummel**

**ThirdParty Defendant**

**Unknown Hummel**  
*Named as Jane Doe Hummel*

**ThirdParty Plaintiff**

**Optima Technology Group  
Incorporated**

represented by **Edward Moomjian , II**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Cross Claimant**

**Optima Technology Group  
Incorporated**

represented by **Edward Moomjian , II**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*

V.

**Cross Defendant**

**Optima Technology Corporation**  
*TERMINATED: 07/07/2008*

represented by **Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Counter Claimant**

**Optima Technology Group  
Incorporated**

represented by **Edward Moomjian , II**  
(See above for address)  
*TERMINATED: 03/03/2008*

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*  
*ATTORNEY TO BE NOTICED*

V.

**Counter Defendant**

**Universal Avionics Systems  
Corporation**

represented by **Allan Andrew Kassenoff**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Paul J Sutton**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Scott Joseph Bornstein ,**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**E Jeffrey Walsh**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Counter Claimant**

**Optima Technology Group  
Incorporated**

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(See above for address)  
*TERMINATED: 03/03/2008*  
*ATTORNEY TO BE NOTICED*

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*  
*ATTORNEY TO BE NOTICED*

**Jeffrey Lynn Willis**  
(See above for address)

**Robert Alan Bernheim**  
(See above for address)  
*ATTORNEY TO BE NOTICED*

**Counter Claimant**

**Jed Margolin**

represented by **Edward Moomjian , II**  
(See above for address)  
*TERMINATED: 03/03/2008*  
*ATTORNEY TO BE NOTICED*

**Jeanna Chandler Nash**  
(See above for address)  
*TERMINATED: 03/03/2008*

ATTORNEY TO BE NOTICED

Jeffrey Lynn Willis  
(See above for address)  
ATTORNEY TO BE NOTICED

Robert Alan Bernheim  
(See above for address)  
ATTORNEY TO BE NOTICED

V.

**Counter Defendant**

**Optima Technology Corporation**

represented by **Jeanna Chandler Nash**  
(See above for address)  
TERMINATED: 03/03/2008

Date Filed	#	Docket Text
11/09/2007	<u>1</u>	SEALED COMPLAINT. Filing fee received: \$ 350.00, receipt number 1549612, filed by Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit Part 1 of 2# <u>2</u> Exhibit Part 2 of 2# <u>3</u> Summons OTC# <u>4</u> Summons OTG# <u>5</u> Summons JA# <u>6</u> Summons RA# <u>7</u> Civil Cover Sheet)(Walsh, E) Modified on 1/25/2008 (DNO, SEALED PER ORDER <u>39</u> ). Modified on 2/15/2008 (APJ, ). (Entered: 11/09/2007)
11/09/2007		This case has been assigned to the Honorable Raner C. Collins. All future pleadings or documents should bear the correct case number: CIV-07-588-TUC-RCC. (GPA, ) (Entered: 11/15/2007)
11/15/2007	<u>2</u>	Summons Issued as to Optima Technology Corporation. (GPA, ). *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 11/15/2007)
11/15/2007	<u>3</u>	Summons Issued as to Optima Technology Group, Inc.. (GPA, ). *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 11/15/2007)
11/15/2007	<u>4</u>	Summons Issued as to Jed Margolin. (GPA, ). *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 11/15/2007)
11/15/2007	<u>5</u>	Summons Issued as to Robert Adams. (GPA, ). *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 11/15/2007)
11/15/2007	<u>6</u>	Notice re electronically sending a magistrate election form to filer by

		Universal Avionics Systems Corporation (GPA, ) (Entered: 11/15/2007)
12/17/2007	<u>7</u>	Quarterly MOTION for Extension of Time To Answer based on Stipulation by Optima Technology Corporation, Robert Adams, Jed Margolin. (Attachments: # <u>1</u> Supplement Stipulation, # <u>2</u> Text of Proposed Order Order) (Chandler, Jeanna) (Entered: 12/17/2007)
12/19/2007	<u>8</u>	ORDER granting <u>7</u> Motion for Extension of Time. Dfts have up to 1/7/08 to serve/file their answer. Signed by Judge Raner C Collins on 12/18/07.(SSU, ) (Entered: 12/19/2007)
01/04/2008	<u>9</u>	MOTION for Admission Pro Hac Vice as to attorney Scott J Bornstein on behalf of Universal Avionics Systems Corporation. (BAS, ) (Entered: 01/04/2008)
01/04/2008	<u>10</u>	MOTION for Admission Pro Hac Vice as to attorney Paul J Sutton on behalf of Universal Avionics Systems Corporation. (BAS, ) (Entered: 01/04/2008)
01/04/2008	<u>11</u>	MOTION for Admission Pro Hac Vice as to attorney Allan A Kassenoff on behalf of Universal Avionics Systems Corporation. (BAS, ) (Entered: 01/04/2008)
01/04/2008		PRO HAC VICE FEE PAID. \$ 100, receipt number PHX066316 as to Scott J Bornstein. (BAS, ) (Entered: 01/04/2008)
01/04/2008		PRO HAC VICE FEE PAID. \$ 100, receipt number PHX066315 as to Paul J Sutton. (BAS, ) (Entered: 01/04/2008)
01/04/2008		PRO HAC VICE FEE PAID. \$ 100, receipt number PHX066314 as to Allan A Kassenoff. (BAS, ) (Entered: 01/04/2008)
01/04/2008	<u>12</u>	ORDER pursuant to General Order 05-25 granting <u>9</u> Motion for Admission Pro Hac Vice; granting <u>10</u> Motion for Admission Pro Hac Vice; granting <u>11</u> Motion for Admission Pro Hac Vice.Per the Court's Administrative Policies and Procedures Manual, applicant has five (5) days in which to register as a user of the Electronic Filing System. Registration to be accomplished via the court's website at www.azd.uscourts.gov. (BAS, )(This is a TEXT ENTRY ONLY. There is no.pdf document associated with this entry.) (Entered: 01/04/2008)
01/07/2008	<u>13</u>	MOTION to Dismiss Case by Optima Technology Group, Inc., Robert Adams. (Chandler, Jeanna) Modified on 1/9/2008 (SSU, DOCUMENT FILED WITH INCORRECT CASE NUMBER AND DOCUMENT NOT IN COMPLIANCE WITH LRCiv 7.1(c). ATTORNEY NOTICED). (Entered: 01/07/2008)
01/07/2008	<u>16</u>	SEALED LODGED Proposed Memorandum in Support of Motion to Dismiss Adams/Optima re: 14 MOTION to Seal Document re Memorandum in Support of Adams/Optima Motion to Dismiss. Document to be filed by Clerk if Motion to Seal is granted. Filed by Optima Technology Group, Inc., Robert Adams. (Chandler, Jeanna) (Entered: 01/07/2008)
01/07/2008	<u>17</u>	MOTION to Dismiss Case for Lack of Jurisdiction by Robert Adams. (Chandler, Jeanna) Modified on 1/9/2008 (SSU, DOCUMENT FILED WITH

		INCORRECT CASE NUMBER AND DOCUMENT NOT IN COMPLIANCE WITH LRCiv 7.1(c). ATTORNEY NOTICED). (Entered: 01/07/2008)
01/07/2008	<u>20</u>	SEALED LODGED Proposed Memorandum in Support of Adams Motion to Dismiss for Lack of Personal Jurisdiction re: 18 MOTION to Seal Document re Memorandum in Support of Motion To Dismiss. Document to be filed by Clerk if Motion to Seal is granted. Filed by Robert Adams. (Chandler, Jeanna) (Entered: 01/07/2008)
01/07/2008	<u>21</u>	MOTION to Dismiss Case for Lack of Jurisdiction by Jed Margolin. (Chandler, Jeanna) Modified on 1/9/2008 (SSU, DOCUMENT FILED WITH INCORRECT CASE NUMBER AND DOCUMENT NOT IN COMPLIANCE WITH LRCiv 7.1(c). ATTORNEY NOTICED). (Entered: 01/07/2008)
01/07/2008	<u>24</u>	SEALED LODGED Proposed Memorandum in Support of Margolins Motion to Dismiss re: 22 MOTION to Seal Document re Memorandum in Support of Margolins Motion to Dismiss. Document to be filed by Clerk if Motion to Seal is granted. Filed by Jed Margolin. (Chandler, Jeanna) (Entered: 01/07/2008)
01/07/2008	<u>27</u>	ANSWER to <u>1</u> Complaint, with Jury Demand by Optima Technology Group, Inc. (Chandler, Jeanna) Modified on 1/9/2008 (SSU, DOCUMENT FILED WITH INCORRECT CASE NUMBER AND DOCUMENT NOT IN COMPLIANCE WITH LRCiv 7.1(c). ATTORNEY NOTICED). (Entered: 01/07/2008)
01/07/2008	<u>28</u>	Corporate Disclosure Statement by Optima Technology Group, Inc. (Chandler, Jeanna) TEXT Modified on 1/8/2008 (SSU, DOCUMENT FILED WITH INCORRECT CASE NUMBER). (Entered: 01/07/2008)
01/08/2008	<u>29</u>	MOTION for Leave to File Excess Pages by Optima Technology Group, Inc., Robert Adams. (Attachments: # <u>1</u> Text of Proposed Order Proposed Order) (Chandler, Jeanna) Modified on 1/9/2008 (SSU, DOCUMENT FILED WITH INCORRECT CASE NUMBER AND DOCUMENT NOT IN COMPLIANCE WITH LRCiv 7.1(c). ATTORNEY NOTICED). (Entered: 01/08/2008)
01/08/2008	<u>31</u>	ORDER granting <u>14</u> Motion to Seal Document ; granting <u>18</u> Motion to Seal Document ; granting <u>22</u> Motion to Seal Document. Signed by Judge Raner C Collins on 1/8/08.(SGG, ) (Entered: 01/09/2008)
01/08/2008	<u>32</u>	Sealed Document: Memorandum Per Order <u>31</u> filed by Optima Technology Group, Inc., Robert Adams. (SGG, ) (Entered: 01/09/2008)
01/08/2008	<u>33</u>	Sealed Document: Memorandum Per Order <u>31</u> filed by Robert Adams. (SGG, ) (Entered: 01/09/2008)
01/08/2008	<u>34</u>	Sealed Document: Memorandum Per Order <u>31</u> filed by Jed Margolin. (SGG, ) (Entered: 01/09/2008)
01/09/2008	<u>30</u>	ORDER granting <u>29</u> Motion for Leave to File Excess Pages. Signed by Judge Raner C Collins on 1/9/08.(SSU, ) (Entered: 01/09/2008)



01/22/2008	<u>36</u>	First MOTION for Extension of Time Extension of Deadline under Rule 14 (A)(1) <i>Unopposed</i> by Optima Technology Group, Inc.. (Attachments: # <u>1</u> Text of Proposed Order)(Moomjian, Edward) DOCUMENT NOT IN COMPLIANCE WITH LRCiv7.1(c). ATTORNEY NOTICED. Modified on 1/24/2008 (SSU, ). (Entered: 01/22/2008)
01/23/2008	<u>37</u>	ORDER granting <u>36</u> Motion for Extension of Time. Deadline for filing third party claims as a right is extended until and including 1/24/08. Signed by Judge Raner C Collins on 1/22/08.(SSU, ) (Entered: 01/23/2008)
01/24/2008	<u>38</u>	AMENDED ANSWER to <i>COMPLAINT</i> , THIRD PARTY COMPLAINT against JOACHIM L. NAIMER, JANE DOE NAIMER, FRANK E. HUMMEL, JANE DOE HUMMEL, CROSSCLAIM against Optima Technology Corporation, COUNTERCLAIM against Universal Avionics Systems Corporation by Optima Technology Group, Inc.. (Moomjian, Edward) DOCUMENT FILED WITH INCORRECT CASE NUMBER. TEXT Modified on 1/25/2008 (SSU, ). (Entered: 01/24/2008)
01/24/2008	<u>39</u>	SEALED ORDER granting <u>35</u> Motion to Seal Document ; denying <u>25</u> Motion to Seal Document. Signed by Judge Raner C Collins on 01/23/08. (DNO, ) (Entered: 01/25/2008)
01/30/2008	<u>40</u>	Notice re Summons by Optima Technology Group, Inc. (Attachments: # <u>1</u> Summons)(Moomjian, Edward) (Entered: 01/30/2008)
01/30/2008	<u>41</u>	Summons Issued as to Optima Technology Group, Inc., Optima Technology Corporation. (Attachments: # <u>1</u> Summons)(BJW, ). *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 01/30/2008)
02/06/2008	<u>42</u>	Notice re Summons to Frank E. Hummel by Optima Technology Group, Inc. (Attachments: # <u>1</u> Summons Jane Doe Hummel, # <u>2</u> Summons Joachim L. Naimer, # <u>3</u> Summons Jane Doe Naimer)(Chandler, Jeanna) (Entered: 02/06/2008)
02/06/2008	<u>43</u>	Summons Issued as to Joachim L Naimer, Jane Doe Naimer, Frank E Hummel, Jane Doe Hummel. (Attachments: # <u>1</u> Summons, # <u>2</u> Summons, # <u>3</u> Summons)(BJW, ). *** IMPORTANT: You must select "Document and stamps" or "Document and comments" on the print screen in order for the court seal to appear on the summons you print. (Entered: 02/06/2008)
02/11/2008	<u>48</u>	SEALED MOTION to Seal Document by Universal Avionics Systems Corporation. (DNO, ) (Entered: 02/15/2008)
02/13/2008	<u>44</u>	AFFIDAVIT of Phyllis Callahan <i>re Affidavit of Process Server as to Service Upon Reza Zandian (Statutory Agent) for Optima Technology Corporation</i> by Cross Claimant Optima Technology Group, Inc.. (Chandler, Jeanna) (Entered: 02/13/2008)
02/13/2008	<u>45</u>	MOTION for Extension of Time to File Answer re Counterclaims and Third-Party Claims by Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Supplement Stipulation re Enlargement of Time for Plaintiff

		Counterdefendant and Third-Party Defendants to Answer or Otherwise Respond to Counterclaims and Third-Party Claims, # 2 Text of Proposed Order Order Enlarging Time)(Walsh, E) (Entered: 02/13/2008)
02/13/2008	<u>46</u>	Corporate Disclosure Statement by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 02/13/2008)
02/14/2008	<u>47</u>	ORDER granting <u>45</u> Motion for Extension of Time to Answer. Joachim L Naimer answer due 4/14/2008; Jane Doe Naimer answer due 4/14/2008; Frank E Hummel answer due 4/14/2008; Jane Doe Hummel answer due 4/14/2008; Universal Avionics Systems Corporation answer due 3/18/2008. Signed by Judge Raner C Collins on 2/14/08.(SSU, ) (Entered: 02/14/2008)
02/15/2008	<u>49</u>	SUMMONS Returned Executed by Universal Avionics Systems Corporation. Jed Margolin served on 11/26/2007. (Walsh, E) (Entered: 02/15/2008)
02/15/2008	<u>50</u>	SUMMONS Returned Executed by Universal Avionics Systems Corporation. Optima Technology Corporation served on 11/28/2007. (Walsh, E) (Entered: 02/15/2008)
02/15/2008	<u>51</u>	SEALED ORDER granting <u>48</u> Motion to Seal Document. Signed by Judge Raner C Collins on 02/15/08.(SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>52</u>	SEALED RESPONSE to Motion re <u>13</u> MOTION to Dismiss Case filed by Universal Avionics Systems Corporation., Sealed per Order <u>51</u> . (SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>53</u>	SEALED RESPONSE to Motion re <u>17</u> MOTION to Dismiss Case for Lack of Jurisdiction filed by Universal Avionics Systems Corporation. Sealed per Order <u>51</u> . (SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>54</u>	SEALED RESPONSE to Motion re <u>21</u> MOTION to Dismiss Case for Lack of Jurisdiction filed by Universal Avionics Systems Corporation. Sealed per Order <u>51</u> . (SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>55</u>	SEALED MOTION to Expedite Discovery by Universal Avionics Systems Corporation. Sealed per Order <u>51</u> . (SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>56</u>	Sealed Document: Memorandum and Support of <u>55</u> filed by Universal Avionics Systems Corporation. Sealed per Order <u>51</u> . (SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>57</u>	Sealed Document: Declaration filed by Universal Avionics Systems Corporation. Sealed per Order <u>51</u> (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit, # <u>3</u> Exhibit)(SGG, ) (Entered: 02/20/2008)
02/15/2008	<u>58</u>	Sealed Document: Declaration filed by Universal Avionics Systems Corporation. Sealed per Order <u>51</u> . (SGG, ) (Entered: 02/20/2008)
02/28/2008	<u>59</u>	MOTION to Expedite Motion for Extension of Time by Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Moomjian, Edward) (Entered: 02/28/2008)
02/28/2008	<u>60</u>	MOTION for Extension of Time Extension of Time <i>Motion for Extension of Time to Submit Replies</i> by Optima Technology Group, Inc., Robert Adams,

		Jed Margolin. (Attachments: # <u>1</u> Text of Proposed Order)(Moomjian, Edward) (Entered: 02/28/2008)
02/28/2008	<u>61</u>	ORDER granting <u>59</u> Motion to Expedite.; granting <u>60</u> Motion for Extension of Time. Dfis have 30 days up to and including 3/31/08 to file their replies in support of Motions to Dismiss and Response/Opposition to the Motion for Expedited Discovery. Signed by Judge Raner C Collins on 2/28/08.(SSU, ) (Entered: 02/28/2008)
02/28/2008	<u>62</u>	MEMORANDUM re: In Opposition to Motion for Extension of Time by Plaintiff Universal Avionics Systems Corporation. (Walsh, E) (Entered: 02/28/2008)
03/03/2008	<u>64</u>	SEALED ORDER granting <u>63</u> Motion to Withdraw. Signed by Judge Raner C Collins on 02/28/08.(DNO, ) (Entered: 03/05/2008)
03/18/2008	<u>65</u>	ANSWER to <u>38</u> Amended Answer to Complaint, Third Party Complaint, Crossclaim, Counterclaim,, by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 03/18/2008)
04/01/2008	<u>66</u>	NOTICE of Appearance by Jeffrey Lynn Willis on behalf of Optima Technology Group, Inc., Robert Adams, Jed Margolin (Willis, Jeffrey) (Entered: 04/01/2008)
04/01/2008	<u>67</u>	STIPULATION for <i>72-Hour Extension of Time to File Replies in Support of Motions to Dismiss and Response to Plaintiff's Motion for Expedited Discovery (Second Request)</i> by Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Attachments: # <u>1</u> Text of Proposed Order)(Willis, Jeffrey) (Entered: 04/01/2008)
04/01/2008	<u>68</u>	ORDER re <u>67</u> STIPULATION for 72-Hour Extension of Time to File Replies in Support of Motions to Dismiss and Response to Plaintiff's Motion for Expedited Discovery, due 4/3/08. Signed by Judge Raner C Collins on 4/1/08. (KMF, ) (Entered: 04/01/2008)
04/02/2008	<u>69</u>	NOTICE of Appearance by Jeffrey Lynn Willis on behalf of Optima Technology Group, Inc., Robert Adams, Jed Margolin (Willis, Jeffrey) (Entered: 04/02/2008)
04/02/2008	<u>70</u>	APPLICATION for Entry of Default by Defendants Optima Technology Group, Inc., against Optima Technology Corporation, Inc.. (Attachments: # <u>1</u> Text of Proposed Order Proposed Entry of Default)(Willis, Jeffrey) Modified on 4/2/2008 to correct applicant (BJW, ). (Entered: 04/02/2008)
04/03/2008	<u>71</u>	REPLY in Support re <u>21</u> MOTION to Dismiss Case for Lack of Jurisdiction <i>and Request for Stay of Proceedings on Motion to Dismiss</i> filed by Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Willis, Jeffrey) (Entered: 04/03/2008)
04/03/2008	<u>72</u>	REPLY in Support re <u>13</u> MOTION to Dismiss Case filed by Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Willis, Jeffrey) (Entered: 04/03/2008)
04/03/2008	<u>73</u>	RESPONSE to Motion re <u>55</u> MOTION to Expedite Discovery filed by

		Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Willis, Jeffrey) (Entered: 04/03/2008)
04/07/2008	<u>74</u>	Clerk's ENTRY OF DEFAULT as to Optima Technology Corporation (PAB, ) (Entered: 04/07/2008)
04/09/2008	<u>75</u>	ORDER granting <u>13</u> Motion to Dismiss Case and as amended by <u>72</u> Reply; Counts 5, 6, 7 of Plaintiff's Complaint are dismissed without prejudice to Plaintiff refiling thises claims in state court. Counts 2-4 and 7-12 of Defendants' state law counterclaims, cross-claims and third-party claims are dismissed without prejudice. Ordered denying as moot <u>17</u> Motion to Dismiss Case for Lack of Jurisdiction; dft Adams is dismissed. Ordered denying <u>21</u> Motion to Dismiss Case for Lack of Jurisdiction and <u>71</u> Request for a Stay of Proceedings. Signed by Judge Raner C Collins on 4/9/08.(SSU, ) (Entered: 04/09/2008)
04/10/2008	<u>76</u>	APPLICATION for Entry of Default by Defendant Optima Technology Group, Inc. against Optima Technology Corporation. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Text of Proposed Order)(Willis, Jeffrey) (Entered: 04/10/2008)
04/14/2008	<u>77</u>	Clerk's ENTRY OF DEFAULT as to Optima Technology Corporation. (SSU, ) (Entered: 04/14/2008)
04/29/2008	<u>78</u>	STIPULATION by Optima Technology Group, Inc., Optima Technology Corporation, Universal Avionics Systems Corporation, Robert Adams, Jed Margolin. (Attachments: # <u>1</u> Text of Proposed Order Order)(Walsh, E) (Entered: 04/29/2008)
05/06/2008	<u>79</u>	ORDER denying <u>55</u> Motion to Expedite, pursuant to Stipulation <u>78</u> . Pla Universal Avionics Systems Corporation may file an amended complaint to reflect the effect of this Court's 4/9/08 Order on or before 5/9/08. Dfts Optima Technology Group and Jed Margolin will respond to the amended complaint within ten days of service. Universal will file a reply to any counterclaims within ten days after being served with such counterclaims. Any and all responsive pleadings that were or may have been due before the date of this Order are vacated in favor of the schedule set forth herein. Signed by Judge Raner C Collins on 4/29/08.(JEMB, ) (Entered: 05/06/2008)
05/13/2008	<u>82</u>	**PHRASE "OR PATENT TROLL" PG1 LINE 24, & PARAGRAPHS 37-43 STRIKEN PER ORDER <u>101</u> **Sealed Document: FIRST AMENDED COMPLAINT filed by Universal Avionics Systems Corporation. (JEMB, ) Modified on 7/7/2008 (JEMB, TO REFLECT STRICKEN SECTIONS). (Entered: 05/16/2008)
05/14/2008	<u>81</u>	ORDER granting <u>80</u> Motion to Seal Document. Signed by Judge Raner C Collins on 5/14/08.(JEMB, ) (Entered: 05/16/2008)
05/16/2008	<u>83</u>	CERTIFICATE OF SERVICE by Universal Avionics Systems Corporation (Walsh, E) (Entered: 05/16/2008)
05/20/2008	<u>84</u>	Sealed MOTION to Seal Document re Motion to Unseal Chandler & Udall, LLP'S Ex Parte Motion to Withdraw as Counsel by Universal Avionics

		Systems Corporation. (Attachments: # <u>1</u> Text of Proposed Order)(Walsh, E) Modified on 5/21/2008 to seal document(PAB, ). (Entered: 05/20/2008)
05/20/2008	<u>85</u>	SEALED LODGED Proposed Motion to Unseal Chandler & Udall, LLP's Ex Parte Motion to Withdraw as Counsel re: <u>84</u> MOTION to Seal Document re Motion to Unseal Chandler & Udall, LLP'S Ex Parte Motion to Withdraw as Counsel. Document to be filed by Clerk if Motion to Seal is granted. Filed by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 05/20/2008)
05/20/2008	<u>86</u>	SEALED LODGED Proposed Declaration of Allan A. Kassenoff in Support of Plaintiff Universal Avionics Systems Corporation's Motion to Unseal Chandler & Udall, LLP's Ex Parte Motion to Withdraw as Counsel re: <u>84</u> MOTION to Seal Document re Motion to Unseal Chandler & Udall, LLP'S Ex Parte Motion to Withdraw as Counsel. Document to be filed by Clerk if Motion to Seal is granted. Filed by Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit)(Walsh, E) (Entered: 05/20/2008)
05/21/2008	<u>89</u>	ORDER granting <u>84</u> Motion to Seal Document. Signed by Judge Raner C Collins on 5/20/08.(JEMB, ) (Entered: 05/22/2008)
05/21/2008	<u>90</u>	MOTION to Unseal Document re Chandler & Udall, LLP's Ex Parte Motion to Withdraw as Counsel by Universal Avionics Systems Corporation. (JEMB, ) (Entered: 05/22/2008)
05/21/2008	<u>91</u>	Sealed Document: Declaration filed by Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit)(JEMB, ) (Entered: 05/22/2008)
05/22/2008	<u>87</u>	MOTION to Strike <i>Allegations From Amended Complaint</i> by Optima Technology Group, Inc., Jed Margolin. (Bernheim, Robert) (Entered: 05/22/2008)
05/22/2008	<u>88</u>	Additional Attachments to Main Document re <u>87</u> MOTION to Strike <i>Allegations From Amended Complaint Proposed Order Granting Defendants' Motion to Strike Allegations from Amended Complaint</i> by Defendants Optima Technology Group, Inc., Jed Margolin. (Bernheim, Robert) (Entered: 05/22/2008)
05/29/2008	<u>92</u>	RESPONSE in Opposition re <u>90</u> MOTION to Unseal Document re Chandler & Udall, LLP's Ex Parte Motion to Withdraw as Counsel filed by Optima Technology Group, Inc., Jed Margolin. (Bernheim, Robert) (Entered: 05/29/2008)
06/04/2008	<u>93</u>	RESPONSE in Opposition re <u>87</u> MOTION to Strike <i>Allegations From Amended Complaint</i> filed by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 06/04/2008)
06/05/2008	<u>94</u>	REPLY in Support re <u>90</u> MOTION to Unseal Document re Chandler & Udall, LLP's Ex Parte Motion to Withdraw as Counsel filed by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 06/05/2008)
06/09/2008	<u>96</u>	SEALED ORDER denying <u>90</u> Motion to Unseal Document. Signed by Judge Raner C Collins on 6/9/08.(JEMB, ) (Entered: 06/12/2008)
06/11/2008	<u>95</u>	Notice re Joint Rule 26(f) Report and Respective Case Management Plans by

		Optima Technology Group, Inc., Universal Avionics Systems Corporation (Willis, Jeffrey) (Entered: 06/11/2008)
06/18/2008	<u>97</u>	REPLY to Response to Motion re <u>87</u> MOTION to Strike <i>Allegations From Amended Complaint</i> filed by Optima Technology Group, Inc., Jed Margolin. (Bernheim, Robert) (Entered: 06/18/2008)
06/18/2008	<u>98</u>	MOTION for Default Judgment as to Cross-Defendants Optima Technology Corp. (a CA corp.) and Optima Technology Corp.(a NV corp.) by Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Attachments: # <u>1</u> Text of Proposed Order [Proposed] Form of Judgment)(Bernheim, Robert) (Entered: 06/18/2008)
06/23/2008	<u>99</u>	RESPONSE in Opposition re <u>98</u> MOTION for Default Judgment as to Cross-Defendants Optima Technology Corp. (a CA corp.) and Optima Technology Corp.(a NV corp.) MOTION for Default Judgment as to Cross-Defendants Optima Technology Corp. (a CA corp.) and Optima Technology Corp.(a NV corp.) filed by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 06/23/2008)
06/27/2008	<u>100</u>	Reply re <u>99</u> Response in Opposition to Motion, by Defendant Optima Technology Group, Inc.. (Bernheim, Robert) (Entered: 06/27/2008)
07/07/2008	<u>101</u>	ORDER granting in part and denying in part <u>87</u> Motion to Strike, Plaintiff may file an amended complaint by 7/15/08; granting <u>98</u> Motion for Default Judgment against Cross-Dfts Optima Technology Corporation, a CA Corporation, and Optima Technology Corporation, a NV Corporation.Signed by Judge Raner C Collins on 7/2/08.(SSU, ) (Entered: 07/07/2008)
07/08/2008	<u>102</u>	REQUEST <i>For Entry of Separate Judgment Under Rule 58(d)</i> by Defendants Optima Technology Group, Inc., Robert Adams, Jed Margolin. (Attachments: # <u>1</u> Proposed Form of Judgment)(Bernheim, Robert) (Entered: 07/08/2008)
07/10/2008	<u>103</u>	Notice re of Service of Defendant Optima Technology Group, Inc.'s First Set of Interrogatories to Plaintiff by Optima Technology Group, Inc. (Willis, Jeffrey) (Entered: 07/10/2008)
07/15/2008	<u>104</u>	AMENDED COMPLAINT <i>Second</i> against Optima Technology Corporation, Optima Technology Group, Inc., Jed Margolin;Jury Demand, filed by Universal Avionics Systems Corporation.(Walsh, E) (Entered: 07/15/2008)
07/15/2008	<u>105</u>	AFFIDAVIT of Process Server Dean Nichols <i>on Mercury Computer Systems, Inc.</i> by Plaintiff Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit Subpoena)(Walsh, E) (Entered: 07/15/2008)
07/15/2008	<u>106</u>	AFFIDAVIT of Process Server Ronald Bodtke <i>for Service on Reza Zandian</i> by Plaintiff Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit Subpoena)(Walsh, E) (Entered: 07/15/2008)
07/15/2008	<u>107</u>	NOTICE of Deposition of Jed Margolin, filed by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 07/15/2008)
07/15/2008	<u>108</u>	NOTICE of Deposition of Robert Adams, filed by Universal Avionics Systems Corporation. (Walsh, E) (Entered: 07/15/2008)

07/15/2008	<u>109</u>	Notice re Service of Plaintiff's First Set of Interrogatories to Defendant Optima Technology Group, Inc. by Universal Avionics Systems Corporation (Walsh, E) TEXT HAS BEEN MODIFIED TO REFLECT CORRECT DOCUMENT TITLE, PER ATTORNEY. Modified on 7/16/2008 (SSU, ). (Entered: 07/15/2008)
07/16/2008	<u>110</u>	Notice re Service of Plaintiff's First Request for Production of Documents to Defendant Optima Technology Group, Inc. by Universal Avionics Systems Corporation by Universal Avionics Systems Corporation (Walsh, E) (Entered: 07/16/2008)
07/18/2008	<u>111</u>	NOTICE of Deposition of UAS, filed by Optima Technology Group, Inc.. (Willis, Jeffrey) (Entered: 07/18/2008)
07/18/2008	<u>112</u>	NOTICE of Deposition of Joaquin Naimer, filed by Optima Technology Group, Inc.. (Willis, Jeffrey) (Entered: 07/18/2008)
07/18/2008	<u>113</u>	NOTICE of Deposition of Don Berlin, filed by Optima Technology Group, Inc.. (Willis, Jeffrey) (Entered: 07/18/2008)
07/18/2008	<u>114</u>	NOTICE of Deposition of Frank Hummel, filed by Optima Technology Group, Inc.. (Willis, Jeffrey) (Entered: 07/18/2008)
07/21/2008	<u>115</u>	MOTION for Reconsideration re Of the Court's Default Ruling Against Optima Technology Corporation Filed July7, 2008 by Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit A)(Mandel, Robert) (Entered: 07/21/2008)
07/23/2008	<u>116</u>	MOTION for Hearing or Conference re: Rule 16 Conference by Optima Technology Group, Inc., Jed Margolin. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Text of Proposed Order)(Willis, Jeffrey) (Entered: 07/23/2008)
07/25/2008	<u>117</u>	APPLICATION for Entry of Default by Plaintiff Universal Avionics Systems Corporation against Optima Technology Corporation. (Attachments: # <u>1</u> Text of Proposed Order Entry of Default)(Mandel, Robert) (Entered: 07/25/2008)
07/25/2008	<u>118</u>	DECLARATION of Declaration of Allan A. Kassenoff in Support of Plaintiff's Application for Entry of Default re <u>117</u> Application for Entry of Default by Plaintiff Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B)(Mandel, Robert) (Entered: 07/25/2008)
07/28/2008	<u>119</u>	RESPONSE in Opposition re <u>116</u> MOTION for Hearing or Conference re: Rule 16 Conference <i>and Expedited Stay of Proceedings Pending Conference</i> filed by Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C)(Mandel, Robert) (Entered: 07/28/2008)
07/29/2008	<u>120</u>	Clerk's ENTRY OF DEFAULT as to Optima Technology Corporation (SSU, ) (Entered: 07/29/2008)
07/29/2008	<u>121</u>	ORDER granting in part and denying in part <u>116</u> Motion; Court will set scheduling conference but will not grant a stay of the proceedings. Telephonic Scheduling Conference set for 8/28/2008 10:00 AM before Judge Raner C Collins' law clerk, Isaac Rothschild. Further ordered, parties file with the Court a joint report reflecting the results of the conference by 8/25/08. Signed

		by Judge Raner C Collins on 7/29/08.(SSU, ) (Entered: 07/29/2008)
07/29/2008	<u>122</u>	<i>Optima Technology Group and Jed Margolin's ANSWER to 104 Amended Complaint and, COUNTERCLAIM</i> against Optima Technology Corporation by Optima Technology Group, Inc., Jed Margolin.(Bernheim, Robert) (Entered: 07/29/2008)
07/31/2008	<u>123</u>	MOTION FOR DEFAULT JUDGMENT by Plaintiff Universal Avionics Systems Corporation against Optima Technology Corporation. (Mandel, Robert) EVENT AND TEXT MODIFIED FROM Application for Default Judgment TO Motion for Default Judgment. Modified on 8/5/2008 (SSU, ). (Entered: 07/31/2008)
08/06/2008	<u>124</u>	Notice re Service of Requests for Production to Garmin International, Inc. by Optima Technology Group, Inc., Jed Margolin (Bernheim, Robert) (Entered: 08/06/2008)
08/06/2008	<u>125</u>	Notice re Answers to Universal Avionics Systems Corporation's First Set of Interrogatories by Optima Technology Group, Inc. (Willis, Jeffrey) (Entered: 08/06/2008)
08/12/2008	<u>126</u>	Reply <i>TO DEFENDANT OPTIMA TECHNOLOGY GROUP, INC.S COUNTERCLAIMS</i> by Plaintiff Universal Avionics Systems Corporation. (Mandel, Robert) (Entered: 08/12/2008)
08/13/2008	<u>127</u>	Notice re SERVICE OF OBJECTIONS AND RESPONSES TO OPTIMA TECHNOLOGY GROUP, INC.'S FIRST SET OF INTERROGATORIES by Universal Avionics Systems Corporation (Mandel, Robert) (Entered: 08/13/2008)
08/18/2008	<u>128</u>	Notice re Service of Responses to Universal Avionics Systems Corporation's First Request for Production of Documents and Things by Optima Technology Group, Inc., Jed Margolin (Bernheim, Robert) (Entered: 08/18/2008)
08/18/2008	<u>129</u>	ORDER denying <u>115</u> Motion for Reconsideration ; granting <u>123</u> Motion for Default Judgment. Signed by Judge Raner C Collins on 8/18/08.(CLJ, ) (Entered: 08/18/2008)
08/18/2008	<u>130</u>	DEFAULT JUDGMENT in favor of Universal Avionics Systems Corporation against Optima Technology Corporation. Signed by Judge Raner C Collins on 8/18/08. (CLJ, ) (Entered: 08/18/2008)
08/18/2008	<u>131</u>	ORDER that Final Judgment entered against Cross-Defendants Optima Technology Corporation. ***See attached PDF for complete information***. Signed by Judge Raner C Collins on 8/18/08. (CLJ, ) (Entered: 08/18/2008)
08/18/2008	<u>132</u>	ORDER that Final Judgment entered against Defendant Optima Technology Corporation. ***See attached PDF for complete information***. Signed by Judge Raner C Collins on 8/18/08. (CLJ, ) (Entered: 08/18/2008)
08/18/2008	<u>133</u>	CLERK'S JUDGMENT in favor of Universal Avionics Systems Corporation against Optima Technology Corporation. Cross-defendant Optima Technology Corporation has been terminated. Signed by Judge Raner C



		Collins on 8/18/08. (CLJ, ) (Entered: 08/18/2008)
08/18/2008	<u>134</u>	CLERK'S JUDGMENT in favor of Universal Avionics Systems Corporation against Optima Technology Corporation. Defendant Optima Technology Corporation has been terminated. Signed by Judge Raner C Collins on 8/18/08. (CLJ, ) (Entered: 08/18/2008)
08/25/2008	<u>135</u>	NOTICE of Deposition of Optima Technology Group 30(b)(6), filed by Universal Avionics Systems Corporation. (Mandel, Robert) (Entered: 08/25/2008)
08/25/2008	<u>136</u>	REPORT of Joint Rule 26(f) Report and Respective Case Management Plans by Defendants Optima Technology Group, Inc., Jed Margolin, Plaintiff Universal Avionics Systems Corporation. (Bernheim, Robert) (Entered: 08/25/2008)
08/26/2008	<u>137</u>	Notice re Notice of Service of Initial Disclosures by Universal Avionics Systems Corporation (Mandel, Robert) (Entered: 08/26/2008)
08/28/2008	<u>138</u>	Notice re Service of Defendants' Rule 26(a)(1) Initial Disclosure Statement by Optima Technology Group, Inc., Jed Margolin (Bernheim, Robert) (Entered: 08/28/2008)
08/28/2008	<u>139</u>	SCHEDULING ORDER: Discovery due by 9/12/2009. Dispositive motions due by 11/12/2009. Proposed Pretrial Order due by 11/25/2009. Status Report due by 1/5/2009. See attached PDF for additional information. Signed by Judge Raner C Collins on 8/28/08. (SSU, ) (Entered: 08/28/2008)
09/05/2008	<u>140</u>	MOTION for Extension of Time <i>To File Briefs</i> by Optima Technology Group, Inc., Jed Margolin. (Attachments: # <u>1</u> Text of Proposed Order) (Bernheim, Robert) (Entered: 09/05/2008)
09/08/2008	<u>141</u>	ORDER granting <u>140</u> Motion for Extension of Time. Dft's briefs re: prejudice resulting from disputed patent prosecution exclusion be filed by 9/12/08, Dft's briefs re: preliminary invalidity contentions be filed by 9/15/08 and Plaintiff's brief re: case bifurcation be filed by 9/15/08. See attached PDF for additional information. Signed by Judge Raner C Collins on 9/8/08.(SSU, ) (Entered: 09/08/2008)
09/15/2008	<u>142</u>	STIPULATION <i>to Extend Deadlines to File Briefs</i> by Optima Technology Group, Inc., Jed Margolin, Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Text of Proposed Order)(Bernheim, Robert) (Entered: 09/15/2008)
09/16/2008	<u>143</u>	ORDER granting <u>142</u> Stipulation : dfts have until 9/19/08 to file their briefs re: prejudice resulting from the disputed patent prosecution exclusion, 9/22/08 to file briefs re: preliminary invalidity contentions, Plaintiff have until 9/22/08 to file their brief re: case bifurcation. All parties have 10 days to file responsive memorandum after the initial briefs are filed. Signed by Judge Raner C Collins on 9/16/08. (SSU, ) (Entered: 09/16/2008)
09/19/2008	<u>144</u>	BRIEF <i>Re Prejudice Caused by Universal's Proposed Restriction Against Patent Prosecution</i> by Defendants Optima Technology Group, Inc., Jed Margolin. (Bernheim, Robert) (Entered: 09/19/2008)

09/22/2008	<u>145</u>	STIPULATION to <i>Extend Deadlines to File Briefs</i> by Optima Technology Group, Inc., Jed Margolin, Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Text of Proposed Order)(Bernheim, Robert) (Entered: 09/22/2008)
09/23/2008	<u>146</u>	ORDER granting <u>145</u> Stipulation : Dfts shall have up to and including 9/29/2008 to file their motion regarding preliminary invalidity contentions. Pla shall have up to and including 9/29/2008 to file their motion regarding case bifurcation and up to and including 10/10/2008 to file their brief regarding disputed patent prosecution exclusion. The parties shall have ten days after the filing of the motions to respond.. Signed by Judge Raner C Collins on 9/22/08. (JKM, ) (Entered: 09/23/2008)
09/23/2008	<u>147</u>	STIPULATION of Dismissal with <i>Prejudice</i> by Optima Technology Group, Inc., Jed Margolin, Universal Avionics Systems Corporation. (Attachments: # <u>1</u> Text of Proposed Order)(Bernheim, Robert) (Entered: 09/23/2008)
09/24/2008	<u>148</u>	ORDER granting <u>147</u> Stipulation of Dismissal :All claims and counterclaims in this action are dismissed with prejudice and the Clerk shall CLOSE this case. Each party shall be responsible for paying its own attorneys' fees and costs incurred in this action.. Signed by Judge Raner C Collins on 9/23/08. (JKM, ) (Entered: 09/24/2008)

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

UNIVERSAL AVIONICS SYSTEMS CORPORATION,

Plaintiff,

vs.

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

Defendants.

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

Counterclaimant,

vs.

UNIVERSAL AVIONICS SYSTEMS CORPORATION, an Arizona corporation,

Counterdefendant,

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

Cross-Claimant,

vs.

OPTIMA TECHNOLOGY CORPORATION,

Cross-Defendant.

No. CV 07-588-TUC-RCC

ORDER

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

Therefore, IT IS HEREBY ORDERED:

Final Judgment is entered against Cross-Defendants Optima Technology Corporation, a California corporation, and Optima Technology Corporation, a Nevada corporation, as follows:

1. Optima Technology Corporation has no interest in U.S. Patents Nos. 5,566,073 and 5,904,724 ("the Patents") or the Durable Power of Attorney from Jed Margolin dated July 20, 2004 ("the Power of Attorney");

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

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

4. OTC is hereby enjoined from asserting further rights or interests in the Patents and/or Power of Attorney; and

5. There is no just reason to delay entry of final judgment as to Optima Technology Corporation under Federal Rule of Civil Procedure 54(b).

DATED this 18<sup>th</sup> day of August, 2008.



Raner C. Collins  
United States District Judge

6/22/11

ORIGINAL

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ALAN GLOVER  
BY *[Signature]*  
DEPUTY

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

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

10 JED MARGOLIN, an individual,

11 Plaintiff,

12 vs.

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

24 Defendants.

Case No.: 090C00579 1B

Dept. No.: 1

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

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.

27 ///  
28 ///

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.**<sup>1</sup> 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  
26

27  
28 <sup>1</sup> 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 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.**<sup>3</sup> 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**.

26  
27  
28 <sup>3</sup> 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.<sup>4</sup> He owns 10 properties in Washoe County.<sup>5</sup> He owns and/or is  
23 partial owner of 6 properties in Lyon County.<sup>6</sup> He is part owner of two properties in Churchill  
24 County.<sup>7</sup> He is part owner of one property in Elko County.<sup>8</sup>

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.<sup>9</sup> Currently, 11000 Reno  
27 Highway, Fallon, LLC is listed as the owner of 640 acres of real property in Churchill  
28 County.<sup>10</sup>

24 <sup>4</sup> See Zandian's Clark County property information, attached hereto as Exhibit 4.

25 <sup>5</sup> See Zandian's Washoe County property information, attached hereto as Exhibit 5.

26 <sup>6</sup> See Zandian's Lyon County property information, attached hereto as Exhibit 6.

27 <sup>7</sup> See Zandian's Churchill County property information, attached hereto as Exhibit 7.

28 <sup>8</sup> See Zandian's Elko County property information, attached hereto as Exhibit 8.

<sup>9</sup> See Zandian's manager information for 11000 Reno Highway, Fallon, L.L.C., attached hereto as Exhibit 9.

<sup>10</sup> 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.<sup>11</sup> Zandian is a managing member and registered agent of Elko  
3 North 5<sup>th</sup> Avenue, LLC, a Nevada LLC in active status.<sup>12</sup> Zandian is a managing member and  
4 registered agent for Stagecoach Valley LLC, an active Nevada LLC.<sup>13</sup>

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.<sup>14</sup> Zandian was a managing member of Gold Canyon  
8 Development LLC, a Nevada LLC that is now in default status.<sup>15</sup> Zandian was a managing  
9 member of High Tech Development LLC, a Nevada LLC that has been dissolved.<sup>16</sup> Zandian  
10 was a managing member of Lyon Park Development LLC, a Nevada LLC that has been  
11 dissolved.<sup>17</sup> Zandian was a managing member of Churchill Park Development LLC, a Nevada  
12 LLC that has been dissolved.<sup>18</sup> Zandian was a manager of Sparks Village LLC, a Nevada LLC  
13 that is in default status.<sup>19</sup> Zandian was president, secretary, treasurer, director and resident  
14 agent of Optima Technology Corporation, a now revoked Nevada close corporation.<sup>20</sup>  
15 Zandian was a managing member of I-50 Plaza LLC, a Nevada LLC in default status.<sup>21</sup>  
16 Zandian was a manager of Dayton Plaza, LLC, a Nevada LLC in default status.<sup>22</sup> Finally,  
17 Zandian was a manager of Reno Highway Plaza, LLC, a Nevada LLC in revoked status.<sup>23</sup>

18  
19 <sup>11</sup> See Zandian's managing member and resident agent information for Misfits Development LLC, attached hereto  
as Exhibit 11.

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

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

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

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

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

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

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

27 <sup>19</sup> See Zandian's manager information for Sparks Village LLC, attached hereto as Exhibit 19.

28 <sup>20</sup> See Zandian's information for Optima Technology Corporation, attached hereto as Exhibit 20.

<sup>21</sup> See Zandian's information for I-50 Plaza LLC, attached hereto as Exhibit 21.

<sup>22</sup> See Zandian's information for Dayton Plaza, LLC, attached hereto as Exhibit 22.

<sup>23</sup> 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 5<sup>th</sup> Ave, LLC, and Stagecoach Valley LLC.<sup>24</sup>

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,

28 <sup>24</sup> 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 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 NRCP 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).<sup>25</sup>

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 <sup>25</sup> 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 NRC 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  
20 respectfully requests this Court's assistance in obtaining a current address from  
21 counsel as to where Zandian can be "properly" served with a summons and con  
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.  
28



AFFIRMATION PURSUANT TO RULES 239B.030

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

Dated this 22<sup>nd</sup> 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*

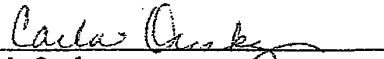
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1 **CERTIFICATE OF SERVICE**

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

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 <sup>th</sup> 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





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DECEMBER 10, 2007

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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

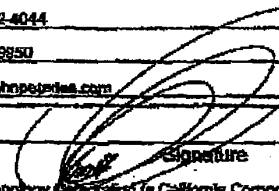
ISSUE DATE: 11/02/1999

TITLE: SIMULATED AM RADIO

THERESA FREDERICK, EXAMINER  
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<b>3. Nature of conveyance/Execution Date(s):</b> 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	<b>4. Application or patent number(s):</b> <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s)  B. Patent No.(s) <u>6,568,073</u> <u>5,904,724</u> <u>6,377,488</u> <u>5,978,488</u>  Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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<b>8. Signature:</b>  Signature Optima Technology Corporation (a California Corporation) Name of Person Signing	<b>8. Payment Information</b> a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/08</u> b. Deposit Account Number _____ Authorized User Name _____  Date <u>12/05/2007</u> Total number of pages including cover sheet, attachments, and documents: <u>7</u>

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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

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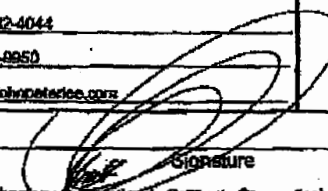
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<b>9. Signature:</b>  Signature _____ Date <u>12/5/2007</u> Optima Technology Corporation (a California Corporation) Name of Person Signing _____		Total number of pages including cover sheet, attachments, and documents: <u>7</u>	

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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

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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

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MARCUS KIRK, EXAMINER  
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<b>3. Nature of conveyance/Execution Date(s):</b> Execution Date(s) December 5, 2007 <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 8424, Confirmatory License <input type="checkbox"/> Other		<b>4. Application or patent number(s):</b> <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s)  B. Patent No.(s) 5,566,073 5,904,724 6,377,436 5,978,488 Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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<b>8. Signature:</b> <i>Jed Margolin</i> by <i>[Signature]</i> Signature <i>his Attorney in Fact</i> Date 12/5/2007 Optima Technology Corporation (a California Corporation) Name of Person Signing		<b>8. Payment Information</b> a. Credit Card Last 4 Numbers 1004 Expiration Date 01/09 b. Deposit Account Number _____ Authorized User Name _____	
Total number of pages including cover sheet, attachments, and documents: 7			

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Documents to be recorded (including cover sheet) should be filed in (571) 273-0160, or mailed to: Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, VA 22313-4450



**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

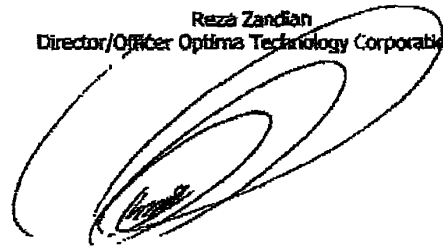
to be assigned to Optima Technology Corporation a Nevada Corporation with the Address:

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







**COPY**

No. 090C00579 1B

Dept. I

REC'D & FILED  
2010 MAR -9 PM 2:15  
ALAN GLOVER  
BY J. HARKLEROAD  
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 Golanreza Zandianjazi aka Gholam Reza Zandian  
aka Reza Jazi aka J. Reza Defendant, 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

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 [Signature]  
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

**FIDAVIT 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 22<sup>ND</sup> day of JANUARY, 20 10, and personally served the same upon REZA ZANDIAN the within named defendant, on the 2<sup>ND</sup> 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 12<sup>TH</sup> 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.  
2 Case No. 090C00579 IB  
3 Declaration of Robert Toth

4 I, ROBERT TOTH, hereby declare:

5 I am a registered process server for the State of California. I have personal knowledge of  
6 the facts contained in this Declaration, and if called as a witness, I could and would competently  
7 testify thereto. As to those matters alleged on information and belief, I believe them to be true.

8 I served copies of the Summons and Complaint, on Reza Zandian aka Golanreza  
9 Zandianjaza, aka Gholam Reza Zandian, aka Reza Jazi, aka J. Reza Jazi, aka G. Reza Jazi, aka  
10 Ghonoreza Zanian Jazi:

11 On January 26, 2010 at 8:43 a.m., I wen to the residence address at 8401 Bonita Downs  
12 Road, Fair Oaks, California 95628. There was no answer at the door.

13 On January 28, 2010 at 3:47 p.m., I returned to the residence again, and there was no  
14 answer at the door.

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

17 On February 2, 2010 at 5:37 p.m., when I returned to the residence address, I observed no  
18 lights on, no cars parked, but that the trash was set out.

19 On February 2, 2010 at 7:21 p.m., I returned to the residence address. The door was  
20 answered by an elderly man, described as mid to late-60's, middle eastern accent, 5'4" tall, grey  
21 hair, long beard, thin, and wearing glasses. I told him I was looking for Reza. I showed him the  
22 name on the documents with the various names, and made a motion that he knew one or more of  
23 the names. I showed him the photograph that I had. I told him I had legal documents for Reza,  
24 and that I would leave it with him. He took the envelope, opened it and saw the documents. He  
25 told me that he did not want the papers and that he did not live there. I told him that we had  
26 confirmed that was his address. He returned the envelope back. I told him that he needed to  
27 make sure that Reza got the paperwork. I put the envelope by the doorway. He picked up the  
28 envelope and threw it at me as I was leaving. I left the documents there and again told him that  
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 18<sup>th</sup> day of February, at Citrus Heights, California.

*Robert M Toth*

ROBERT M. TOTH  
Registered Process Server









January 8, 2010

KELLY G. WATSON<sup>1</sup>  
MICHAEL D. ROUNDS<sup>2</sup>  
MATTHEW D. FRANCIS<sup>2</sup>

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

OF COUNSEL  
MARC D. FOODMAN<sup>1,2</sup>

<sup>1</sup> Also licensed in California  
<sup>2</sup> Also licensed in Utah  
<sup>3</sup> Also licensed in Massachusetts  
<sup>4</sup> Licensed only in California

5371 Kietzke Lane  
Reno, Nevada 89511  
(775) 324-4100  
Fax (775) 333-8171  
e-mail: [reno@watsonrounds.com](mailto:reno@watsonrounds.com)

777 North Rainbow Boulevard  
Suite 330  
Las Vegas, Nevada 89107  
(702) 636-4902  
Fax (702) 636-4904

One Market-Stewart Tower  
Suite 1600  
San Francisco, CA 94105  
(415) 243-4090  
Fax (415) 243-0226

[www.watsonrounds.com](http://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 OC 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 Ghonorreza 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



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 black ink, appearing to read "Cassandra P. Joseph".

Cassandra P. Joseph  
WATSON ROUNDS  
A Professional Corporation

COPY

1 Case No.: 09 DC 00579 1B

2 Dept. No.: I

REC'D & FILED

2009 DEC 11 PM 4:07

BY ~~W. GLOVER~~  
CLERK  
DEPUTY

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

8  
9 JED MARGOLIN, an individual,

10 Plaintiff,

11 vs.

12 OPTIMA TECHNOLOGY  
13 CORPORATION, a California corporation,  
14 OPTIMA TECHNOLOGY CORPORATION,  
15 a Nevada corporation, REZA ZANDIAN aka  
16 GOLAMREZA ZANDIANJAZI aka  
17 GHOLAM REZA ZANDIAN aka REZA  
18 JAZI aka J. REZA JAZI aka G. REZA  
19 JAZI aka GHONONREZA ZANDIAN JAZI,  
20 an individual, DOE Companies 1-10, DOE  
21 Corporations 11-20, and DOE Individuals  
22 21-30,

23 Defendants.

24  
25 COMPLAINT

(Exemption From Arbitration Requested)

26 Plaintiff, JED MARGOLIN ("Mr. Margolin"), by and through his counsel of record,  
27 WATSON ROUNDS, and for his Complaint against Defendants, hereby alleges and complains  
28 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 Golanreza Zandianjazi,  
5 aka Golanreza 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 6. Mr. Margolin believes, and therefore alleges, that at all times herein mentioned,  
13 each of the Defendants was the agent, servant or employee of each of the other Defendant and at  
14 all times was acting within the course and scope of said agency and/or employment and that each  
15 Defendant is liable to Mr. Margolin for the reasons and the facts herein alleged. Relief is sought  
16 herein against each and all of the Defendants jointly and severally, as well as its or their agents,  
17 assistants, successors, employees and all persons acting in concert or cooperation with them or at  
18 their direction. Mr. Margolin will amend his Complaint when such additional persons acting in  
19 concert or cooperation are ascertained.

20  
21  
22 **Jurisdiction and Venue**

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







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WHEREFORE, Plaintiff Jed Margolin, prays for judgment against the Defendants as follows:

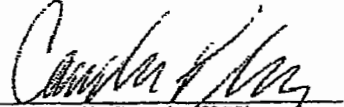
1. That Plaintiff be awarded damages for Defendants' tortious conduct;
2. That Plaintiff be awarded damages for Defendants' unjust enrichment;
3. That Plaintiff be awarded damages for Defendants' commission of unfair and deceptive trade practices, in an amount to be proven at trial, with said damages 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

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

No. CV 07-588-TUC-RCC  
ORDER

UNIVERSAL AVIONICS SYSTEMS CORPORATION,

Plaintiff,

vs.

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

Defendants.

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

Counterclaimant,

vs.

UNIVERSAL AVIONICS SYSTEMS CORPORATION, an Arizona corporation,

Counterdefendant,

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

Cross-Claimant,

vs.

OPTIMA TECHNOLOGY CORPORATION,

Cross-Defendant.

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 18<sup>th</sup> day of August, 2008.

20  
21  
22 

23 Raner C. Collins  
24 United States District Judge



GENERAL INFORMATION	
PARCEL	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 ID	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	40000
MONTH/YEAR	04/05
LAND USE	0-00 VACANT
DWELLING UNITS	0



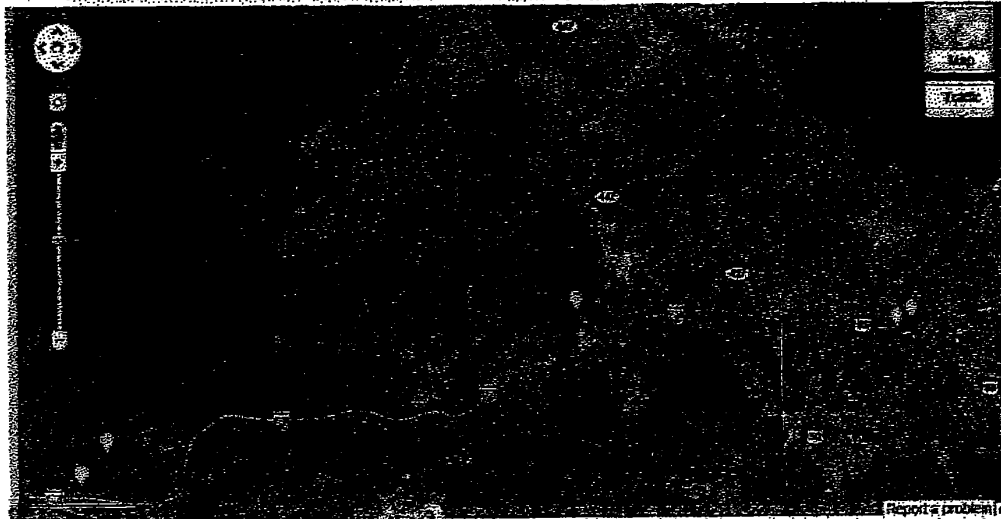


**Zandian's Washoe County Properties - Jed Margolin 4/17/2011**

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		
Owner Name		Mailing Address		Last Transaction Date
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

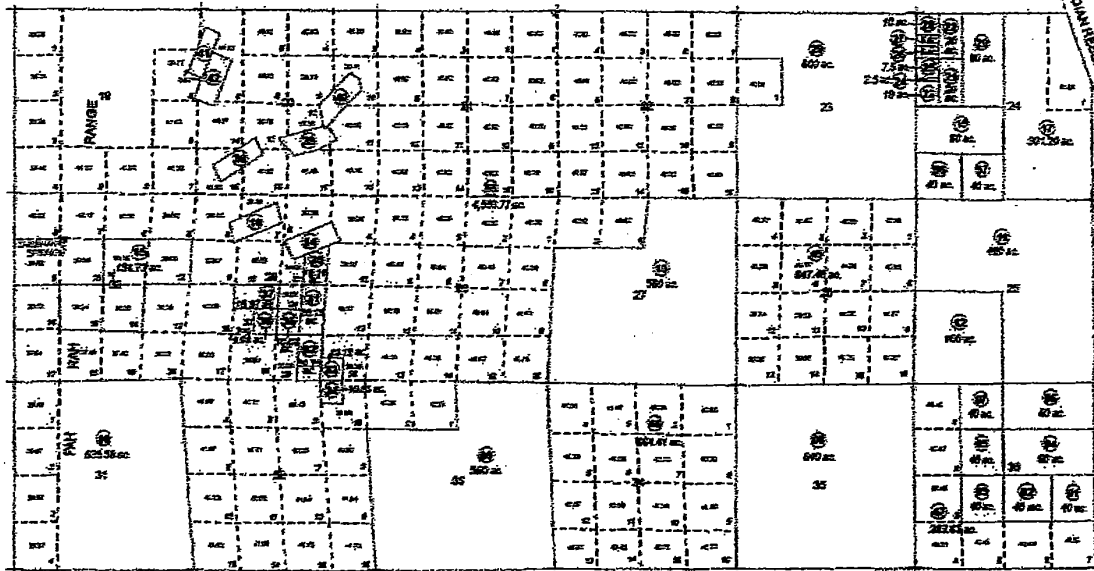
The properties are North of Interstate 80 and East of SR 447. From Google Maps via Zandian's Web site at [www.goldennevada.com](http://www.goldennevada.com). The remaining information is from Washoe County Web site - Assessor's Database.



**PATENTED MINING CLAIMS**

<ul style="list-style-type: none"> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> </ul>	<ul style="list-style-type: none"> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> <li>187-188-189 - GARDNER</li> </ul>
--	--

**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
ZANDIAN, REZA	33
KOROGHLI MANAGEMENT TRUST, TRST	33
KOROGHLI, TRUSTEES, RAY TTEE	
KOROGHLI, TRUSTEE, SATHSOWI T TTEE	

079-150-13 1 STATE ROUTE 447  
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

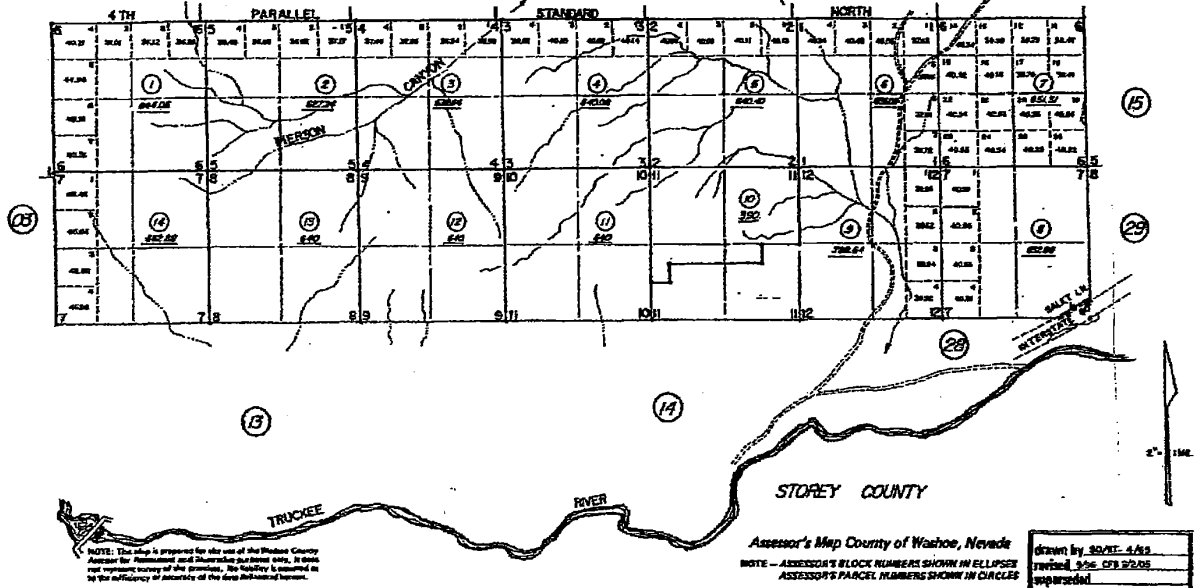
560 acres

[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	

PORTION OF N<sup>2</sup>-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	



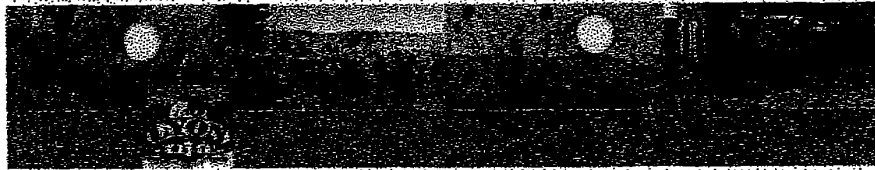
084-140-17 1 E IN RSTATE 80  
REZA ZANDIAN PO BOX 81624 LAS VEGAS NV 89180 05/12/2009

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	





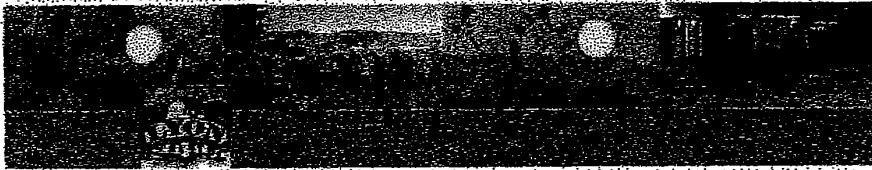
**Real Property Inquiry**  
 Search for Real Property (Land Improvements, etc.)

Order List By:  Parcel #  Owner Name  Property Location  District

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

Parcel #	<input type="text"/>	8-digit #(s), no dashes	Partial Owner Name	<input type="text" value="ZANDIAN"/>
Land Use Code Range	<input type="text"/>	Code Table	examples: SMITH M / ACME MARKETS	
Acreage Range	<input type="text"/>		Partial Property Location	<input type="text"/>
Net Value Range	<input type="text"/>		examples: N MAIN ST / MAPLE DR	
District	<input type="text" value="All"/>			

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



Parcel Detail for Parcel # 006-052-04			
<b>Location</b>		<b>Ownership</b>	
Property Location 125 PIKE ST Town DAYTON Subdivision DAYTON TOWN Lot 4 Block 8 Property Name Remarks		Assessed Owner Name ZANDIAN, REZA Mailing Address P O BOX 827674 SAN DIEGO, CA 92192-7674 Legal Owner Name ZANDIAN, REZA Vesting Doc#, Date 342193 02/04/05 Book/Page / Map Document #s RS90448	
<b>Description</b>		<b>Appraisal Classifications</b>	
Total Acres .220 Ag Acres .000 W/R Acres .000 <b>Improvements</b> Single-fam Detached 0 Non-dwell Units 0 Bdrms/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		Current Land Use Code 140 Zoning C1 Re-appraisal Group 5 Re-appraisal Year 2006 Orig Constr Year Weighted Year	
<b>Assessed Valuation</b>		<b>Taxable Valuation</b>	
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 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



**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 1 Map Document #s R390448

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	Current Land Use Code 140 Zoning C2 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
<b>Increased (New) Values</b>			
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
<b>Increased (New) Values</b>			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0



**Parcel Detail for Parcel # 006-052-06**

Location	Ownership
Property Location 105 PIKE ST Town DAYTON Subdivision DAYTON TOWN Lot 6 Block 6 Property Name Remarks	Assessed Owner Name ZANDIAN, REZA Mailing Address P O BOX 627674 SAN DIEGO, CA 92192-7674 Legal Owner Name ZANDIAN, REZA Vesting Doc#, Date S42193 02/04/05 Book/Page 1 Map Document #s RS90448

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 Aitch/Detch Basement Sq Ft 0 Finished 0	Current Land Use Code 140 Zoning C2 Re-appraisal Group 5 Re-appraisal Year 2008 Orig Constr Year Weighted Year

Assessed Valuation				Taxable Valuation			
Assessed Values	2012-13	2011-12	2010-11	Taxable Values	2012-13	2011-12	2010-11
Land	15,560	15,560	15,560	Land	44,457	44,457	44,457
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0
Ag Land	0	0	0	Ag Land	0	0	0
Exemptions	0	0	0	Exemptions	0	0	0
Net Assessed Value	15,560	15,560	15,560	Net Taxable Value	44,457	44,457	44,457
<b>Increased (New) Values</b>				<b>Increased (New) Values</b>			
Land	0	0	0	Land	0	0	0
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0



**Parcel Detail for Parcel # 015-311-18**

Location	Ownership																																																																																								
Property Location HWY 50 Town STAGECOACH Subdivision Lot Block Property Name Remarks	Assessed Owner Name ZANDIAN, REZA ET AL Mailing Address P O BOX 927674 Add'l Owners SAN DIEGO, CA 92192-7674 Legal Owner Name ZANDIAN, REZA ET AL Vesting Doc#, Date 344412 03/03/05 Book/Page / Map Document #s RS332209																																																																																								
Description	Appraisal Classifications																																																																																								
Total Acres 241.790 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	Current Land Use Code 120 Zoning RR3 Re-appraisal Group 1 Re-appraisal Year 2009 Orig Constr Year Weighted Year																																																																																								
Assessed Valuation	Taxable Valuation																																																																																								
<table border="1" style="width:100%; border-collapse: collapse;"> <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>24,500</td><td>24,500</td><td>24,500</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>24,500</td><td>24,500</td><td>24,500</td></tr> <tr><td colspan="4">Increased (New) Values</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	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	<table border="1" style="width:100%; border-collapse: collapse;"> <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>70,000</td><td>70,000</td><td>70,000</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>70,000</td><td>70,000</td><td>70,000</td></tr> <tr><td colspan="4">Increased (New) Values</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	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
Assessed Values	2012-13	2011-12	2010-11																																																																																						
Land	24,500	24,500	24,500																																																																																						
Improvements	0	0	0																																																																																						
Personal Property	0	0	0																																																																																						
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Taxable Values	2012-13	2011-12	2010-11																																																																																						
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Improvements	0	0	0																																																																																						
Personal Property	0	0	0																																																																																						
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Increased (New) Values																																																																																									
Land	0	0	0																																																																																						
Improvements	0	0	0																																																																																						
Personal Property	0	0	0																																																																																						

Ownership History for Parcel # 015-311-48

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	2005			
8775 COSTA VERDE APT 1416				
SAN DIEGO, CA 92122-0000				
FOUGHANI, NILOOFAR	2005			
ABRISHAMI, ELIAS	2005			
ABRISHAMI, MONOO	2005			
ABRISHAMI, ENAYAT	2005			
ABRISHAMI, NAJMA	2005			

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







**Parcel Detail for Parcel # 015-311-19**

Location	
Property Location HWY 50	
Town STAGECOACH	
Subdivision Lot Block	
Property Name	
Remarks ZONE CHANGE FROM RR3 TO C2 6/1/2006	

Ownership	
Assessed Owner Name ZANDIAN, REZA ET AL	
Mailing Address P O BOX 927674	
Addl Owners SAN DIEGO, CA 92192-7674	
Legal Owner Name ZANDIAN, REZA ET AL	
Vesting Doc#, Date 344412 03/03/05	Book/Page/
Map Document #s RS3322D8	

Description		
Total Acres 47.750	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
	Basement Sq Ft 0	Finished 0

Appraisal Classifications	
Current Land Use Code 140	
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
<b>Net Assessed Value</b>	<b>16,710</b>	<b>16,710</b>	<b>16,710</b>
<u>Increased (New) Values</u>			
Land	0	0	0
Improvements	0	0	0
Personal Property	0	0	0

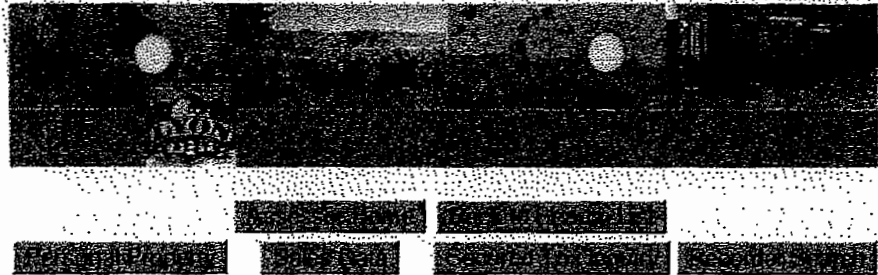
Taxable Valuation			
Taxable Values	2012-13	2011-12	2010-11
Land	47,743	47,743	47,743
Improvements	0	0	0
Personal Property	0	0	0
Ag Land	0	0	0
Exemptions	0	0	0
<b>Net Taxable Value</b>	<b>47,743</b>	<b>47,743</b>	<b>47,743</b>
<u>Increased (New) Values</u>			
Land	0	0	0
Improvements	0	0	0
Personal Property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

Ownership History for Parcel # 015-311-19

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	2005			
8775 COSTA VERDE APT 1416				
SAN DIEGO, CA 92122-0000				
FOUGHANI, NILOOFAR	2005			
ABRISHAMI, ELIAS	2005			
ABRISHAMI, MINOO	2005			
ABRISHAMI, ENAYAT	2005			
ABRISHAMI, NAJMA	2005			

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





**Parcel Detail for Parcel # 021-451-22**

Location			
Property Location			
Town	FERNLEY	[REDACTED]	
Subdivision	Lot	Block	[REDACTED]
Property Name			
[REDACTED]			
Remarks			

Ownership	
Assessed Owner Name ZANDIAN, REZA ET AL	
Mailing Address P O BOX 927674 [REDACTED]	
SAN DIEGO, CA 92192-7874	
Legal Owner Name ZANDIAN, REZA ET AL	
Vesting Doc#, Date 358791 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	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
	Basement Sq Ft 0	Finished 0

Appraisal Classifications	
Current Land Use Code	120 [REDACTED]
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		Prior Owners		
Name	From	Name	From	To
ZANDIAN, REZA ET AL 8775 COSATA VERDE STE 1416 SAN DIEGO, CA 92122-0000	2005	ARNOLD, JACK G 10410 98 ST ANDERSON ISLAND, WA 98303-0000	2003	2005
FOUGHANI, NILOOFAR	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.







# CHURCHILL COUNTY

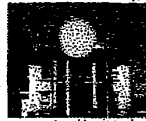
Office of the Assessor

## Parcel Detail for Parcel # 007-151-77

Location	Ownership
Property Location 8825 BRUSH GARDEN DR Town [REDACTED] Subdivision M&B Lot Block [REDACTED] Property Name [REDACTED] Remarks SPLIT PURSUANT TO DEED	Assessed Owner Name ZANDIAN REZA & NILOOFAR Mailing Address P O BOX 927674 Add'l Owners SAN DIEGO CA 92192-7674 [REDACTED] Legal Owner Name ZANDIAN REZA & NILOOFAR Vesting Doc#, Date 384273 07/27/06 Book/Page / Map Document #s 194366

Description	Appraisal Classifications
Total Acres 6.750 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 [REDACTED] Basement Sq Ft 0 Finished 0	Current Land Use Code 100 [REDACTED] Zoning C2 Re-appraisal Group 3 Re-appraisal Year 2011 Orig Constr Year Weighted Year

Assessed Valuation				Taxable Valuation			
Assessed Values	2012-13	2011-12	2010-11	Taxable Values	2012-13	2011-12	2010-11
Land	8,820	8,820	8,820	Land	25,200	25,200	25,200
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0
Ag Land	0	0	0	Ag Land	0	0	0
Exemptions	0	0	0	Exemptions	0	0	0
Net Assessed Value	8,820	8,820	8,820	Net Taxable Value	25,200	25,200	25,200
Increased (New) Values				Increased (New) Values			
Land	0	0	0	Land	0	0	0
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0



# CHURCHILL COUNTY

Office of the Assessor

## Parcel Detail for Parcel # 009-331-04

Location		Ownership	
Property Location 29-20-27		Assessed Owner Name ZANDIAN R & FOUGHAN N	
Town [REDACTED]		Mailing Address P O BOX 927674 [REDACTED]	
Subdivision 29-20-27 [REDACTED]		Addl Owners SAN DIEGO CA 92192-7674 [REDACTED]	
NW1/4 Lot Block [REDACTED]		Legal Owner Name ZANDIAN R & FOUGHAN N	
Property Name [REDACTED]		Vesting Doc#, Date 872688 07/06/05 Book/Page /	
Remarks		Map Document #s	
Description		Appraisal Classifications	
Total Acres 50.000 Ag Acres .000 W/R Acres .000		Current Land Use Code 100 [REDACTED]	
<u>Improvements</u>		Zoning RR20	
Single-fam Detached 0	Non-dwell Units 0 Bdrm/Bath 0/.00	Re-appraisal Group 3 Re-appraisal Year 2011	
Single-fam Attached 0	MH Hookups 0 Stories .0	Orig Constr Year Weighted Year	
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		
Assessed Valuation		Taxable Valuation	
Assessed Values	2012-13 2011-12 2010-11	Taxable Values	2012-13 2011-12 2010-11
Land	2,625 2,625 6,300	Land	7,500 7,500 18,000
Improvements	0 0 0	Improvements	0 0 0
Personal Property	0 0 0	Personal Property	0 0 0
Ag Land	0 0 0	Ag Land	0 0 0
Exemptions	0 0 0	Exemptions	0 0 0
Net Assessed Value	2,625 2,625 6,300	Net Taxable Value	7,500 7,500 18,000
Increased (New) Values		Increased (New) Values	
Land	0 0 0	Land	0 0 0
Improvements	0 0 0	Improvements	0 0 0
Personal Property	0 0 0	Personal Property	0 0 0



SECRET



WELCOME TO ELKO COUNTY, NEVADA

Parcel Detail for Parcel # 001-660-034

Location			Ownership				
Property Location EL ARMUTH DR			Assessed Owner Name ZANDIAN, REZA ET AL				
Town ELKO CITY			Mailing Address				
Subdivision	Lot	Block	PO BOX 927674				
Property Name			SAN DIEGO CA 92192-7674				
			Legal Owner Name ZANDIAN, REZA ET AL				
			Vesting Doc#, Date 560545 09/25/06 Book/Page 7				
			Map Document #s				
Description			Appraisal Classifications				
Total Acres 17.600 Ag Acres .000 W/R Acres .000			Current Land Use Code 120				
<u>Improvements</u>			Zoning R RE				
Single-fam Detached 0	Non-dwell Units 0	Bdrm/Bath 0/.00	Re-appraisal Group Y				
Single-fam Attached 0	MH Hookups 0	Stories .0	Orig Constr Year				
Multi-fam Units 0	Wells 0		Re-appraisal Year 2009				
Mobile Homes 0	Septic Tanks 0		Weighted Year				
Total Dwelling Units 0	Bldg Sq Ft 0						
	Garage Sq Ft 0	Attch/Detch					
	Basement Sq Ft 0	Finished 0					
Assessed Valuation			Taxable Valuation				
Assessed Values	2012-13	2011-12	2010-11	Taxable Values	2012-13	2011-12	2010-11
Land	24,640	24,640	24,640	Land	70,400	70,400	70,400
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0
Ag Land	0	0	0	Ag Land	0	0	0
Exemptions	0	0	0	Exemptions	0	0	0
Net Assessed Value	24,640	24,640	24,640	Net Taxable Value	70,400	70,400	70,400
Increased (New) Values				Increased (New) Values			
Land	0	0	0	Land	0	0	0
Improvements	0	0	0	Improvements	0	0	0
Personal Property	0	0	0	Personal Property	0	0	0



# 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 REZAI			
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:	20050222393-88	# of Pages:	1
File Date:	6/09/2005	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx8nvq=%252ffmBi4IpyKbRFG5zq1Zc...> 6/20/2011

Document Number:	20050222394-79	# of Pages:	2
File Date:	6/1/2005	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)			

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx8nvq=%252ffMBi4IpyKbRFG5zq1Zc...> 6/20/2011

LEGAL DIMENSIONS  
800-535-7754





# CHURCHILL COUNTY

Office of the Assessor

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[Sales Data](#)

[Secured Tax Inquiry](#)

[Recorder Search](#)

## Parcel Detail for Parcel # 007-091-12

### Location

Property Location 11000 RENO HWY  
Town HAZEN

[Add Addresses](#)

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 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	Attch/Detch
<a href="#">Improvement List</a>	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



## ISFITS 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
<b>No stock records found for this company</b>			

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

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx&nvq=JXbqonwG%252FYkEVYqGDg...> 6/20/2011



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

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx&nvq=JXbqonwG%252FYkEVYqGDg...> 6/20/2011



# 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
<b>No stock records found for this company</b>			

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

<http://nvsos.gov/SOSEntitySearch/PrintCorp.aspx?lx&nvq=XKhMrHdBjKn5O9afATh6IA...> 6/20/2011

<b>Action Type:</b>	Initial List	
<b>Document Number:</b>	200437973-30	<b># of Pages:</b> 1
<b>File Date:</b>	9/27/2005	<b>Effective Date:</b>
<b>(No notes for this action)</b>		
<b>Action Type:</b>	Annual List	
<b>Document Number:</b>	20060673304-61	<b># of Pages:</b> 1
<b>File Date:</b>	10/18/2006	<b>Effective Date:</b>
<b>(No notes for this action)</b>		
<b>Action Type:</b>	Annual List	
<b>Document Number:</b>	20070574309-37	<b># of Pages:</b> 1
<b>File Date:</b>	8/20/2007	<b>Effective Date:</b>
<b>07-08</b>		
<b>Action Type:</b>	Annual List	
<b>Document Number:</b>	20080564591-60	<b># of Pages:</b> 1
<b>File Date:</b>	8/25/2008	<b>Effective Date:</b>
<b>08/09</b>		
<b>Action Type:</b>	Annual List	
<b>Document Number:</b>	20090676691-66	<b># of Pages:</b> 1
<b>File Date:</b>	9/11/2009	<b>Effective Date:</b>
<b>(No notes for this action)</b>		
<b>Action Type:</b>	Annual List	
<b>Document Number:</b>	20100642221-00	<b># of Pages:</b> 1
<b>File Date:</b>	8/26/2010	<b>Effective Date:</b>
<b>(No notes for this action)</b>		

<http://nvsos.gov/SOSEntitySearch/PrintCorp.aspx?lx8nvq=XKhMrHdBjKn5O9afATh6IA...> 6/20/2011



## 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
<b>No stock records found for this company</b>	

Officers		<input type="checkbox"/> Include Inactive Officers	
<b>Managing Member - BIJAN AKHAVAN</b>			
Address 1:	15456 VENTURA BLVD #300	Address 2:	
City:	SHERMAN OAKS	State:	CA
Zip Code:	91403	Country:	
Status:	Active	Email:	
<b>Managing Member - SASSAN CHAKAMIAN</b>			
Address 1:	7590 FAY AVE. STE 401	Address 2:	
City:	LA JOLLA	State:	CA
Zip Code:	92037	Country:	
Status:	Active	Email:	
<b>Managing Member - REZA ZANDIAN</b>			
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:	
<b>(No notes for this action)</b>			
Action Type:	Initial List		

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx8nvq=2Xd1t9DCb9iDR1oJTKMx%252...> 6/20/2011

Document Number:	00070248709-69	# of Pages:	1
File Date:	3/2007	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20080270927-97	# of Pages:	1
File Date:	4/21/2008	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20090676690-55	# of Pages:	1
File Date:	9/11/2009	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20100642220-99	# of Pages:	1
File Date:	8/26/2010	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20110343835-00	# of Pages:	1
File Date:	5/06/2011	Effective Date:	
11-12			

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx8nvq=2Xd1t9DCb9iDR1oJTKMx%252...> 6/20/2011



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# ROCK AND ROYALTY LC

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
<b>No stock records found for this company</b>			

Officers		<input type="checkbox"/> Include Inactive Officers
<b>Managing Member - NILOOFAR FOUGHANI ZANDIAN</b>		
Address 1:	8775 COSTA VERDE BLVD	Address 2:
City:	SAN DIEGO	State:
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:	
<b>(No notes for this action)</b>			
Action Type:	Initial List		
Document Number:	20080373743-57	# of Pages:	1
File Date:	5/29/2008	Effective Date:	
08-09			

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# 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
<b>Managing Member - ELIAS ABRISHAMI</b>				
Address 1:	P O BOX 10476	Address 2:		
City:	BEVERLY HILLS	State:	CA	
Zip Code:	90213	Country:		
Status:	Active	Email:		
<b>Managing Member - RAFI ABRISHAMI</b>				
Address 1:	P O BOX 10325	Address 2:		
City:	BEVERLY HILLS	State:	CA	
Zip Code:	90213	Country:		
Status:	Active	Email:		
<b>Managing Member - REZA ZANDIAN</b>				
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		

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Document Number:	LLC11545-2004-002	# of Pages:	1
File Date:	7/2004	Effective Date:	
<b>List of Officers for 2004 to 2005</b>			
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:	
<b>2008-2009</b>			
Action Type:	Annual List		
Document Number:	20090433604-71	# of Pages:	1
File Date:	5/20/2009	Effective Date:	
<b>09-10</b>			
Action Type:	Annual List		
Document Number:	00002746565-45	# of Pages:	1
File Date:	5/28/2010	Effective Date:	
<b>10-11</b>			

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# 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	
<b>Managing Member - ELIAS ABRISHAMI</b>			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
<b>Managing Member - RAFI ABRISHAMI</b>			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
<b>Managing Member - REZA ZANDIAN</b>			
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:	LLC21816-2004-001	# of Pages:	1
File Date:	9/22/2004	Effective Date:	
(No notes for this action)			
Action Type:	Initial List		

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Document Number:	LI 1816-2004-002	# 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)			

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

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Document Number:	21824-2004-002	# of Pages:	1
File Date:	11/01/2004	Effective Date:	
<b>List of Officers for 2004 to 2005</b>			
Action Type:	Dissolution		
Document Number:	20050090105-72	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
<b>(No notes for this action)</b>			

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## CHUOCHILL 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
<b>No stock records found for this company</b>	

Officers		<input type="checkbox"/> Include Inactive Officers	
<b>Managing Member - ELIAS ABRISHAMI</b>			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
<b>Managing Member - RAFI ABRISHAMI</b>			
Address 1:	PO BOX 2919	Address 2:	
City:	CARSON CITY	State:	NV
Zip Code:	89702	Country:	
Status:	Active	Email:	
<b>Managing Member - REZA ZANDIAN</b>			
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:	
<b>(No notes for this action)</b>			
Action Type:	Initial List		

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Document Number:	1827-2004-002	# 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)			

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LEGAL DIMENSIONS  
800-635-7753

## 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
<b>No stock records found for this company</b>	

Officers		<input type="checkbox"/> Include Inactive Officers	
<b>Manager - SEAN S FAYEGHI</b>			
Address 1:	1401 S. LAS VEGAS BLVD	Address 2:	
City:	LAS VEGAS	State:	NV
Zip Code:	89104	Country:	
Status:	Active	Email:	
<b>Manager - REZA ZANDIAN</b>			
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:	
<b>(No notes for this action)</b>			
Action Type:	Initial List		
Document Number:	LLC29380-2004-002	# of Pages:	1
File Date:	12/15/2004	Effective Date:	
<b>List of Officers for 2004 to 2005</b>			
Action Type:	Annual List		
Document Number:	20050561932-73	# of Pages:	1

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File Date:	1/9/2005	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20070107298-06	# of Pages:	1
File Date:	2/08/2007	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20070801466-64	# of Pages:	1
File Date:	11/26/2007	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20080805719-20	# of Pages:	1
File Date:	12/10/2008	Effective Date:	
<b>08-09</b>			
Action Type:	Annual List		
Document Number:	20100743562-60	# of Pages:	1
File Date:	10/01/2010	Effective Date:	
<b>(No notes for this action)</b>			

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LEGAL DIMENSIONS  
900-535-7752



# OPTIA 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
<b>No stock records found for this company</b>			

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

Actions\Amendments

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

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## 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
<b>No stock records found for this company</b>			

Officers				<input type="checkbox"/> Include Inactive Officers
<b>Managing Member - SEAN S FAYEGHI</b>				
Address 1:	1401 S. LAS VEGAS BLVD.	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:		
Status:	Active	Email:		
<b>Managing Member - REZA ZANDIAN</b>				
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:	
<b>(No notes for this action)</b>			
Action Type:	Initial List		
Document Number:	20050007642-26	# of Pages:	1
File Date:	2/03/2005	Effective Date:	
<b>(No notes for this action)</b>			
Action Type:	Annual List		
Document Number:	20050632605-29	# of Pages:	1

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File Date:	1/2005	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)			

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## 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
<b>No stock records found for this company</b>			

Officers				<input type="checkbox"/> Include Inactive Officers
<b>Manager - SEAN S FAYEGHI</b>				
Address 1:	1401 LAS VEGAS BLVD. SOUTH	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89104	Country:		
Status:	Active	Email:		
<b>Manager - SHAHROKH REZAI</b>				
Address 1:	7353 SINGING TREE ST.	Address 2:		
City:	LAS VEGAS	State:	NV	
Zip Code:	89123	Country:		
Status:	Active	Email:		
<b>Manager - REZA ZANDIAN</b>				
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:	
<b>(No notes for this action)</b>			
Action Type:	Initial List		

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Document Number:	200184430-07	# 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)			

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx8nvq=GKSLAI4rhGcQVXCkErH6IQ%...> 6/20/2011



## LENO HIGHWAY PLAZA, 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 Per 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)			

<http://nvsos.gov/sosentitysearch/PrintCorp.aspx?lx&nvq=hVQl%252bOpY%252bbaJV2IH..> 6/20/2011



JOHN PETER LEE, LTD.  
ATTORNEYS AT LAW  
830 LAS VEGAS BLVD. SOUTH  
LAS VEGAS, NEVADA 89101  
Telephone (702) 382-4044  
Telecopier (702) 383-9950

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I.

3 ZANDIAN HAS NOT BEEN SERVED IN THE INSTANT ACTION

4 Zandian's position, as stated in the instant motion to dismiss, is that he was never served with  
5 process in the instant action. Mtn. to Dismiss, p. 3, ll 10-11. The Declaration of the process server  
6 attached to Plaintiff's Opposition as Exhibit "2" clearly states that the unidentified man served by  
7 Plaintiff's process server told the server that Zandian did not reside at the home where service was  
8 tried. See Opposition, Ex. 2, ll. 18-28. This is the only proof that Plaintiff has submitted to evidence  
9 that Zandian was served at his place of residence, however, the Plaintiff submitted a statement  
10 indicating that the residence was not Zandian's. Thus, Plaintiff has not met its burden of proof  
11 demonstrating that Zandian was served at his residence or any other place.

12 Plaintiff also relies on letter attached to Plaintiff's Opposition as Exhibit "3" as proof that  
13 Zandian was served. See Opposition, p. 5, ll. 2-5. This letter was sent to the offices of John Peter  
14 Lee, Ltd., not to Zandian. At the time that this letter was sent, John Peter Lee, Ltd. was not the legal  
15 counsel for Zandian in the instant action. There is no legal authority whatsoever which would  
16 indicate that this is a form of proper service. Therefore, this letter is irrelevant as to whether or not  
17 Zandian was served with a summons and complaint in the instant action.

18 As previously stated in the instant motion to dismiss, the Complaint alleges that Zandian  
19 lives in San Diego, California or Las Vegas, Nevada. The motion also states, "Although Margolin  
20 alleged that Zandian resides in Las Vegas or San Diego, Margolin did not attempt service on Zandian  
21 at his alleged residence, but instead attempted service on Zandian in an entirely different city, Fair  
22 Oaks, California." The instant opposition does not address this issue so that Zandian has never been  
23 given a reason why service was never attempted at his alleged places of residences, but instead  
24 served to someone who reported to the server that Zandian did not reside at the residence where  
25 service was allegedly effectuated. Moreover, in the Complaint, Plaintiff implies that venue is  
26 properly before First District Court because Zandian may be a resident of Storey County. Compl.,  
27 p. 3, ll. 1-3. There is no evidence that service was ever attempted on Zandian in Storey County  
28 either. In fact, all of the evidence presented suggest that Plaintiff may have intentionally served

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1 Zandian at a location that Plaintiff either knew or believed was not Zandian's residence in order to  
2 take a default. Thus, Plaintiff cannot meet his burden of proof demonstrating that Zandian was  
3 afforded his constitutional due process right of notice as prescribed by the clear and unambiguous  
4 rules regarding service.

5 II.

6 **PLAINTIFF'S COUNTERMOTION TO STRIKE ZANDIAN'S MOTION AND TO**  
7 **PROVIDE A MORE DEFINITE STATEMENT MUST BE DENIED.**

8 N.R.C.P. 12(f) provides the basis for a motion to strike:

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

15 The Plaintiff's motion meets none of the requirements and must be denied.

16 Furthermore, Plaintiff's counter motion to strike the instant motion to dismiss is without  
17 merit. Plaintiff suggest that Zandian waived the right to object to insufficiencies with respect to  
18 service and personal jurisdiction because Zandian did not respond in a timely manner. Zandian,  
19 however, could not have been expected to respond to Plaintiff's Complaint before he was given  
20 proper notice thereof. Thus, Plaintiff's counter motion in this regard must be denied.

21 The Complaint cannot be save now, considering that it was filed 2009, and was not served  
22 within the time prescribed by NRC P 4(i) (stating in pertinent part, "If a service of the summons and  
23 complaint is not made upon a defendant within 120 days after the filing of the complaint, the action  
24 shall be dismissed as to that defendant without prejudice upon the court's own initiative with notice  
25 to such party or upon motion"). Thus Plaintiff's counter motion in this regard must be denied.

26 ...  
27 ...  
28 ...

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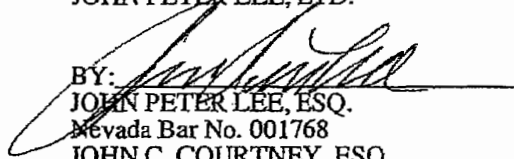
V.

CONCLUSION.

For the above stated reasons, Zandian's Motion to Dismiss Plaintiff's Complaint must be granted, and Plaintiff's counter motions to strike Zandian's objection and to permit Plaintiff to provide a more definite statement must be denied.

DATED this 1st day of July, 2011.

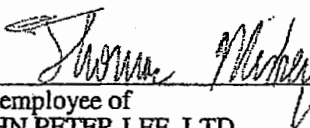
JOHN PETER LEE, LTD.

BY:   
JOHN PETER LEE, ESQ.  
Nevada Bar No. 001768  
JOHN C. COURTNEY, ESQ.  
Nevada Bar No. 011092  
830 Las Vegas Boulevard South  
Las Vegas, Nevada 89101  
Ph: (702) 382-4044/Fax: (702) 383-9950  
Attorneys for Defendant Reza Zandian

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 1st day of July, 2011, a copy of the foregoing REPLY TO OPPOSITION TO MOTION TO DISMISS ON A SPECIAL APPEARANCE was served on the following parties by mailing a copy thereof, first class mail, postage prepaid, addressed to:

Adam McMillen, Esq.  
Watson Rounds  
5371 Kietzke Lane  
Reno, NV 89511

  
An employee of  
JOHN PETER LEE, LTD.

1 Case No. 09 OC 00579 1B

2 Dept. No. I

REC'D & FILED

2011 AUG -3 AM 8:14

ALAN GLOVER  
CLERK

BY *Alan Glover*  
DEPUTY

6 IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

7 IN AND FOR CARSON CITY

9 JED MARGOLIN, an individual,

10 Plaintiff,

11 vs.

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

22 Defendants.

**ORDER SETTING ASIDE  
DEFAULT, DENYING MOTION TO  
DISMISS AND GRANTING  
EXTENSION OF TIME FOR  
SERVICE**

19 This matter comes before the Court pursuant to Defendant Reza Zandian's  
20 (hereinafter "Zandian" or "Defendant") Motion to Dismiss on a Special Appearance filed  
21 on June 9, 2011. On June 22, 2011, Plaintiff filed his Opposition to Motion to Dismiss and  
22 Countermotion to Strike and for Leave to Amend Complaint. Defendant filed his Reply to  
23 Opposition to Motion to Dismiss on a Special Appearance on July 5, 2011.

24 The Court deeming itself fully advised of the matter, hereby enters its Order as  
25 follows:

26 In his Motion, Defendant argues primarily that service of the summons and  
27 complaint was never effectuated upon Defendant. Defendant further argues that Nevada  
28 does not have personal jurisdiction over Defendant in the instant action.



1 In Opposition, Plaintiff argues that service was effectuated upon Defendant as  
2 evidenced by the fact that the summons and complaint were mailed to Defendant's attorney  
3 and that Defendant was personally served with the summons on February 2, 2010. Plaintiff  
4 additionally argues that this Court has personal jurisdiction over the Defendant in this  
5 action, Defendant cannot meet the standard for his Motion to Dismiss, and Defendant  
6 cannot meet the standard for his Motion to Set Aside. Finally, Plaintiff also asserts that  
7 Defendant's Motion to Dismiss should be stricken as he had previously waived his  
8 objections to personal jurisdiction, process and service of process. In the event that the  
9 Court either dismisses the complaint or sets aside the default, Plaintiff requests leave to  
10 amend the complaint to include proper reference to Defendant's actions in the related  
11 Arizona case and to re-serve Defendant in a proper manner.

12 A review of the affidavit of Plaintiff's process server, Robert Toth, indicates that  
13 service of process was never effectuated upon Defendant. The elderly man with whom the  
14 process server left the summons and complaint informed the process server that Defendant  
15 did not reside there. Accordingly, Defendant was not properly served. Furthermore,  
16 Plaintiff's mailing the summons and complaint to Defendant's attorney did not constitute  
17 proper service of process upon Defendant.

18 Having found that service was never effectuated, the Default Judgment entered  
19 against Defendant on March 1, 2011 shall be set aside. However, the Court declines to  
20 Dismiss the Complaint based on service of process, process or personal jurisdiction at this  
21 time. Finally, given Plaintiff's attempts at effectuating service and the difficulty that  
22 Plaintiff has faced in serving Defendant, Plaintiff shall be given additional time to  
23 effectuate proper service upon Defendant.

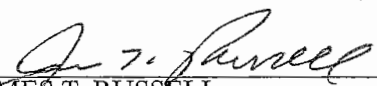
24 Therefore, good cause appearing,

25 IT IS HEREBY ORDERED that the Default Judgment entered against Defendant  
26 on March 1, 2011 shall be set aside.

27 IT IS HEREBY FURTHER ORDERED that the Defendant's Motion to Dismiss on  
28 a Special Appearance is DENIED without prejudice.

1 IT IS HEREBY FURTHER ORDERED that Plaintiff shall have ninety (90) days  
2 from the date of this Order to properly effectuate service of the Complaint and Summons  
3 and/or an Amended Complaint upon Defendant in accordance with NRCP Rule 4, the  
4 Hague convention or any other lawful means of service.

5 DATED this 3<sup>rd</sup> day of August, 2011.

6   
7 JAMES T. RUSSELL  
8 District Court Judge

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 3<sup>rd</sup> day of August, 2011, I placed a copy of the foregoing Order in the United States Mail, postage prepaid, addressed as follows:

Matthew D. Francis, Esq.  
5371 Kietzke Lane  
Reno, NV 89511

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

*Tara C. Zimmerman*  
Tara C. Zimmerman  
Law Clerk, Department One

ORIGINAL

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

REC'D & FILED ✓

2011 AUG 11 PM 4:05

ALAN GLOVER

BY  CLERK  
DEPUTY

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

12 **JED MARGOLIN, an individual,**

13 **Plaintiff,**

14 **vs.**

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

26 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

AMENDED COMPLAINT  
(Exemption From Arbitration Requested)

27 Plaintiff, JED MARGOLIN ("Mr. Margolin"), by and through his counsel of record,  
28 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 California corporation with its principal place of business in Irvine, California.



1 Facts

2 9. Plaintiff Mr. Margolin is the named inventor on numerous patents and patent  
3 applications, including United States Patent No. 5,566,073 ("the '073 Patent"), United States  
4 Patent No. 5,904,724 ("the '724 Patent"), United States Patent No. 5,978,488 ("the '488  
5 Patent") and United States Patent No. 6,377,436 ("the '436 Patent") (collectively "the Patents").

6 10. Mr. Margolin is the legal owner and owner of record for the '488 and '436  
7 Patents, and has never assigned those patents.

8 11. In July 2004, Mr. Margolin granted to Optima Technology Group ("OTG"), a  
9 Cayman Islands Corporation specializing in aerospace technology, a Power of Attorney  
10 regarding the '073 and '724 Patents. In exchange for the Power of Attorney, OTG agreed to  
11 pay Mr. Margolin royalties based on OTG's licensing of the '073 and '724 Patents.

12 12. In May 2006, OTG and Mr. Margolin licensed the '073 and '724 Patents to  
13 Geneva Aerospace, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty  
14 agreement between Mr. Margolin and OTG.

15 13. On about July 20, 2004, Mr. Margolin assigned the '073 and '724 Patents to  
16 OTG.

17 14. In about November 2007, OTG licensed the '073 Patent to Honeywell  
18 International, Inc., and Mr. Margolin received a royalty payment pursuant to the royalty  
19 agreement between Mr. Margolin and OTG.

20 15. In December 2007, Defendant Zandian filed with the U.S. Patent and Trademark  
21 Office ("USPTO") fraudulent assignment documents allegedly assigning all four of the Patents  
22 to Optima Technology Corporation.

23 16. Upon discovery of the fraudulent filing, 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  
26 '724 Patents that it legally owned and upon which it contracted with Mr. Margolin for royalties.

27 17. Shortly before this, Mr. Margolin and OTG had been named as defendants in an  
28 action for declaratory relief regarding non-infringement of the '073 and '724 Patents in the

1 United States District Court for the District of Arizona, in a case titled: *Universal Avionics*  
2 *Systems Corporation v. Optima Technology Group, Inc.*, No. CV 07-588-TUC-RCC (the  
3 "Arizona Action"). In the Arizona Action, Mr. Margolin and OTG filed a cross-claim for  
4 declaratory relief against Optima Technology Corporation (Zandian) in order to obtain legal  
5 title to their respective patents.

6 18. On August 18, 2008, the United States District Court for the District of Arizona  
7 entered a final judgment in favor of Mr. Margolin and OTG on their declaratory relief action,  
8 and ordered that OTC—California and OTC—Nevada had no interest in the '073 or '724  
9 Patents, that the assignment documents filed by Zandian with the USPTO were "forged, invalid,  
10 void, of no force and effect," that the USPTO was to correct its records with respect to any  
11 claim by OTC to the Patents and/or the Power of Attorney, and that OTC was enjoined from  
12 asserting further rights or interests in the Patents and/or Power of Attorney. Attached as Exhibit  
13 A is a copy of the Order from the United States District Court in the Arizona Action.

14 19. Due to Defendants' fraudulent acts, title to the Patents was clouded and  
15 interfered with Plaintiff's and OTG's ability to license the Patents.

16 20. During the period of time Mr. Margolin worked to correct record title of the  
17 Patents in the Arizona Action and with the USPTO, he incurred significant litigation and other  
18 costs associated with those efforts.

19 **Claim 1--Conversion**  
20 **(Against All Defendants)**

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

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

25 23. The Patents and the royalties due Mr. Margolin under the Patents were the  
26 personal property of Mr. Margolin.

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

1 forth below.

2 **Claim 2--Tortious Interference With Contract**  
3 **(Against All Defendants)**

4 25. Paragraphs 1-24 of the Complaint set forth above are incorporated herein by  
5 reference.

6 26. Mr. Margolin was a party to a valid contract with OTG for the payment of  
7 royalties based on the license of the '073 and '724 Patents.

8 27. Defendants were aware of Mr. Margolin's contract with OTG.

9 28. Defendants committed intentional acts intended and designed to disrupt and  
10 interfere with the contractual relationship between Mr. Margolin and OTG.

11 29. As a result of the acts of Defendants, Mr. Margolin's contract with OTG was  
12 actually interfered with and disrupted.

13 30. As a direct and proximate result of the Defendants' tortious interference with  
14 contract, Mr. Margolin has suffered damages in excess of ten thousand dollars (\$10,000),  
15 entitling him to the relief set forth below.

16 **Claim 3--Intentional Interference with Prospective Economic Advantage**  
17 **(Against All Defendants)**

18 31. Paragraphs 1-30 of the Complaint set forth above are incorporated herein by  
19 reference.

20 32. Defendants were aware of Mr. Margolin's prospective business relations with  
21 licensees of the Patents.

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

24 34. The foregoing actions by Defendants interfered with the business relationships of  
25 Mr. Margolin, and were done intentionally and occurred without consent or authority of Mr.  
26 Margolin.

27 35. As a direct and proximate result of the Defendants' tortious interference, Mr.  
28 Margolin has suffered damages in excess of ten thousand dollars (\$10,000), entitling him to the  
relief set forth below.



1  
2 **Claim 4—Unjust Enrichment**  
3 **(Against All Defendants)**

4 36. Paragraphs 1-35 of the Complaint set forth above are incorporated herein by  
5 reference.

6 37. Defendants wrongfully obtained record title to the Patents.

7 38. Defendants were aware that record title to the Patents was valuable, and were  
8 aware of the benefit derived from having record title.

9 39. Defendants unjustly benefitted from the use of Mr. Margolin's property without  
10 compensation to Mr. Margolin.

11 40. As a direct and proximate result of Defendants' aforementioned acts, Mr.  
12 Margolin is entitled to equitable relief.

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

15 41. Paragraphs 1-40 of the Complaint set forth above are incorporated herein by  
16 reference.

17 42. The Defendants, engaging in the acts and conduct described above, have  
18 knowingly and willfully committed unfair and deceptive trade practices under NRS 598.0915 by  
19 making false representations.

20 43. As a direct and proximate result of the Defendants' unfair and deceptive trade  
21 practices, Mr. Margolin has suffered damages in excess of ten thousand dollars (\$10,000),  
22 entitling him to the relief set forth below.

23 WHEREFORE, Plaintiff Jed Margolin, prays for judgment against the Defendants as  
24 follows:

- 25 1. That Plaintiff be awarded damages for Defendants' tortious conduct;  
26 2. That Plaintiff be awarded damages for Defendants' unjust enrichment;  
27 3. That Plaintiff be awarded damages for Defendants' commission of unfair and  
28 deceptive trade practices, in an amount to be proven at trial, with said damages being trebled  
pursuant to NRS 598.0999;



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, AMENDED COMPLAINT (Exemption From  
5 Arbitration Requested), addressed as follows:

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

10 Dated: August 11, 2011

  
11 \_\_\_\_\_  
12 Carla Ousby

ORIGINAL

REC'D & FILED

No. 090C00579 1B

2011 NOV -7 PM 12:48

Dept No. —1

ALAN GLOVER  
BY [Signature] CLERK  
DEPUTY

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

JED MARGOLIN, an individual,  
Plaintiff,

v.

SUMMONS on  
*Amended*  
*Complaint*

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 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: OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation

NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plaintiff(s) 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 the Clerk of the Court a written pleading in response to this Complaint.
2. Unless you respond, a default will be entered upon application of the plaintiff(s) 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

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

ALAN GLOVER  
Clerk of Court  
By [Signature]  
Deputy Clerk

Date August 11, 2011.

\*Note -- When served by publication, insert a brief statement of the object of the action. See Rule 4.

RETURN OF SERVICE ON REVERSE SIDE

AFFP DISTRICT COURT  
Clark County, Nevada

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)  
COUNTY OF CLARK) SS:

Stacey M. Lewis, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

WATSON ROUNDS 3983802WAT 7489602

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 4 edition(s) of said newspaper issued from 10/07/2011 to 10/28/2011, on the following days:

- 10/07/2011
- 10/14/2011
- 10/21/2011
- 10/28/2011

NO. 090C00579.1B DEPT. NO. J  
In the First Judicial District Court of  
the State of Nevada in and for  
Carson City

JED MARGOLIN, an Individual  
Plaintiff -v- 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 GHOLAMREZA ZANDIAN  
JAZI, an individual, DOE Companies  
1-10, DOE Corporations 11-20, and  
DOE Individuals 21-30, Defendants

SUMMONS  
ON AMENDED COMPLAINT

THE STATE OF NEVADA SENDS  
GREETINGS TO OPTIMA  
TECHNOLOGY CORPORATION, a  
Nevada corporation

NOTICE: YOU HAVE BEEN SUED. THIS  
ACTION IS BROUGHT TO RECOVER  
DAMAGES AS A RESULT OF THE  
DEFENDANTS' FRAUDULENT ASSIGN-  
MENT OF DOCUMENTS RELATING TO  
PATENT NO.'S 5,566,073, 5,904,724  
AND 5,978,488 AS MORE FULLY  
STATED IN THE COMPLAINT. THE  
COURT MAY DECIDE AGAINST YOU  
WITHOUT YOUR BEING HEARD  
UNLESS YOU RESPOND WITHIN 20  
DAYS. READ THE INFORMATION  
BELOW.

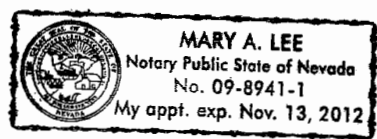
TO THE DEFENDANT: A civil  
Complaint has been filed by the  
Plaintiff(s) against you.

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 the Clerk of the Court a written  
pleading in response to this  
Complaint. 2. Unless you respond, a  
default will be entered upon  
application of the Plaintiff(s) 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 other 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  
Matthew D. Francis  
Adam McMillen  
Watson Rounds, 5371 Kietzke Lane  
Reno, Nevada 89511  
Date August 11, 2011  
ALAN GLOVER Clerk of Court  
By C. COOPER, Deputy Clerk  
PUB: October 7, 14, 21, 28, 2011  
LV Review-Journal

Signed: Stacey M. Lewis

SUBSCRIBED AND SWORN BEFORE ME THIS, THE  
28th day of October, 2011.

Mary Lee  
Notary Public



**RENO NEWSPAPERS INC**  
**Publishers of**  
**Reno Gazette-Journal**  
**955 Kuenzli St • P.O. Box 22,000 • Reno, NV 89520 • 775.788.6200**  
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WATSON ROUNDS  
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RENO NV 89511-2083

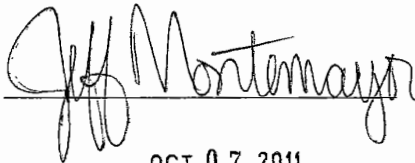
Customer Acct# 310361  
PO# ADD'L SUMMONS ON AME  
Ad# 1000763513  
Legal Ad Cost \$442.24

STATE OF NEVADA  
COUNTY OF WASHOE

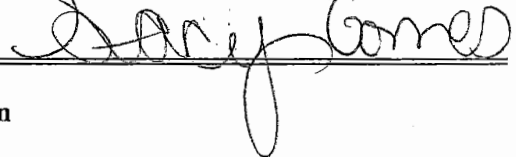
Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the dates: **09/16/2011 - 10/07/2011**, for exact publication dates please see last line of Proof of Publication below.

Subscribed and sworn to before me

Signed:



OCT 07 2011



**Proof of Publication**

SUMMONS On Amended Complaint IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR CARSON CITY No. 090C00579 1 B Dept No. 1 JED MARGOLIN, an individual, Plaintiff, v. OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZAN DIAN aka REZA JAZI aka J. REZA 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: OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO,'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT, 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 or petition has been filed by the plaintiff(s) against you. 1, If you wish to defend this lawsuit, you must, within 20 days after this summons is served on you,

Ad Number: 1000763513

Page 1 of 2

179

JM\_SC1\_0537

exclusive of the day of service, file with the Clerk of the Court a written pleading in response to this Complaint. 2, Unless you respond, a default will be entered upon application of the plaintiff(s) 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 plaintiffs attorney, whose address is: Matthew D. Francis Adam McMillen Watson Rounds 5371 Kietzke Lane Reno, Nevada 89511 Date: August 11, 2011 /s/ALAN GLOVER Clerk of Court Deputy Clerk No. 763513 Sept 16, 23, 30, Oct 7, 2011

**SUMMONS On Amended Complaint  
IN THE FIRST JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA  
IN AND FOR CARSON CITY**

No. 090C00579-1 B  
Dept No. 1

JED MARGOLIN, an individual,  
Plaintiff,

v.

OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZAN DIAN aka REZA JAZI aka J. REZA 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: OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plaintiff(s) 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 the Clerk of the Court a written pleading in response to this Complaint.
- 2, Unless you respond, a default will be entered upon application of the plaintiff(s) 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 plaintiffs attorney, whose address is:

Matthew D. Francis  
Adam McMillen  
Watson Rounds  
5371 Kietzke Lane  
Reno, Nevada 89511  
Date: August 11, 2011

/s/ALAN GLOVER  
Clerk of Court  
Deputy Clerk

No. 763513 Sept 16, 23, 30, Oct 7, 2011

The San Diego  
**Union-Tribune.**

**SIGNON**  
SAN DIEGO

Union-Tribune  
**enlace.**  
en enlace.com

Summons on Amended  
Complaint

No. 09000579 1B  
Dept No. 1

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

**Filed**

P.O. Box 120191, San Diego, CA 92112-0191

## AFFIDAVIT OF PUBLICATION

WATSON ROUNDS  
5371 KIETZKE LANE  
RENO, NV 89511

STATE OF CALIFORNIA } ss.  
County of San Diego }

The Undersigned, declares under penalty of perjury under the laws of the State of California: That she is a resident of the County of San Diego. That she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that she is not a party to, nor interested in the above entitled matter; that she is Chief Clerk for the publisher of

### The San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Sep 23, 2011, Sep 30, 2011, Oct 7, 2011, Oct 14, 2011

  
Chief Clerk for the Publisher

10-14-2011  
Date

### Affidavit of Publication of

Legal Advertisement  
Ad # 0010554081  
ORDERED BY: CARLA OUSBY

JED MARGOLIN,  
an Individual,  
Plaintiff,

v.  
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 CHONONREZA  
ZANDIAN JAZI, an  
individual, DOE  
Companies 1-16,  
DOE Corporations  
11-20, and DOE Individ-  
uals 21-28  
Defendants.

THE STATE OF  
NEVADA SENDS  
GREETINGS TO:  
OPTIMA  
TECHNOLOGY  
CORPORATION, a  
Nevada corporation

NOTICE! YOU  
HAVE BEEN  
SUED. THIS AC-  
TION IS BROUGHT  
TO RECOVER  
DAMAGES AS A  
RESULT OF  
THE DEFEND-  
ANTS' FRAUDU-  
LENT ASSIG-  
NMENT OF DOCU-  
MENTS RELATING  
TO PATENT NO.'S  
5,566,673,  
5,904,723 AND  
5,978,488 AS MORE  
FULLY STATED IN  
THE COMPLAINT.  
THE COURT MAY  
DECIDE  
AGAINST YOU  
WITHOUT YOUR  
BEING HEARD UN-  
LESS YOU RE-  
SPOND WITHIN 20  
DAYS. READ THE  
INFORMATION  
BELOW.

TO THE DEFEND-  
ANT: A civil com-  
plaint or petition has  
been filed by the  
plaintiff(s) against  
you.

1. If you wish to de-  
fend this lawsuit,  
you must, within 20  
days after this sum-  
mons is served on  
you, exclusive of the  
day of service, file  
with the Clerk of the  
Court a written  
pleading in response  
to this Complaint.

2. Unless you re-  
spond, a default will  
be entered upon ap-  
plication of the  
plaintiff(s) and this  
Court may enter a  
judgment against  
you for the relief de-  
manded in the com-  
plaint, which could  
result in the taking  
of money or prop-  
erty or the relief re-  
quested in the  
Complaint.

3. If you wish to seek  
the advice of an at-  
torney in this mat-  
ter, you should do so  
promptly so that  
your response may  
be filed on time.

4. You are required  
to serve your re-  
sponse upon plain-  
tiff's attorney, whose  
address is

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

ALAN GLOVER  
Clerk of Court

By C. Cooper,  
Deputy Clerk

Date August 11, 2011



ORIGINAL

REC'D & FILED

No. 090C00579 1B

2011 NOV -7 PM 12:48

Dept No. 1

ALAN GLOVER  
BY [Signature] CLERK  
DEPUTY

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

JED MARGOLIN, an individual,  
Plaintiff,

v.

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

Add 1  
SUMMONS on  
Amended  
Comp

THE STATE OF NEVADA SENDS GREETINGS TO: OPTIMA TECHNOLOGY CORPORATION, a California corporation

NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plaintiff(s) 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 the Clerk of the Court a written pleading in response to this Complaint.
2. Unless you respond, a default will be entered upon application of the plaintiff(s) 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

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

ALAN GLOVER  
Clerk of Court  
By [Signature]  
Deputy Clerk

Date August 11, 2011

\*Note - When served by publication, insert a brief statement of the object of the action. See Rule 4.

RETURN OF SERVICE ON REVERSE SIDE

AFFP DISTRICT COURT  
Clark County, Nevada

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)  
COUNTY OF CLARK) SS:

Stacey M. Lewis, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

WATSON ROUNDS 3983802WAT 7491280

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 4 edition(s) of said newspaper issued from 10/07/2011 to 10/28/2011, on the following days:

- 10/07/2011
- 10/14/2011
- 10/21/2011
- 10/28/2011

NO. 090C00579 1B DEPT. NO. 1  
In the First Judicial District Court  
of the State of Nevada  
In and for Carson City

JED MARGOLIN, an individual,  
Plaintiff v. 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 CHONONREZA ZANDIAN  
JAZI, an individual, DOE Companies  
1-10, DOE Corporations 11-20, and  
DOE Individuals 21-30, Defendants

Additional SUMMONS  
ON AMENDED COMPLAINT  
THE STATE OF NEVADA SENDS  
GREETINGS TO: OPTIMA  
TECHNOLOGY CORPORATION,  
a California corporation

NOTICE: YOU HAVE BEEN SUED. THIS  
ACTION IS BROUGHT TO RECOVER  
DAMAGES AS A RESULT OF THE  
DEFENDANTS FRAUDULENT ASSIGN-  
MENT OF DOCUMENTS RELATING TO  
PATENT NO.'S 5,566,073, 5,904,724  
AND 5,978,488 AS MORE FULLY  
STATED IN THE COMPLAINT. THE  
COURT MAY DECIDE AGAINST YOU  
WITHOUT YOUR BEING HEARD  
UNLESS YOU RESPOND WITHIN 20  
DAYS. READ THE INFORMATION  
BELOW.

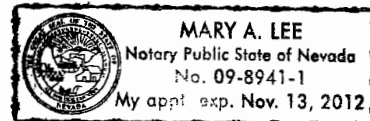
TO THE DEFENDANT: A civil  
Complaint has been filed by the  
Plaintiff(s) against you:

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Summons is served on you,  
exclusive of the day of service, file  
with the Clerk of the Court a written  
pleading in response to this  
Complaint.
2. Unless you respond, a  
default will be entered upon  
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in the complaint, which could  
result in the taking of money or  
property or other 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:  
Matthew D. Francis  
Adam McMillen  
Watson Rounds, 5371 Kietzke Lane,  
Reno, Nevada 89511  
Date: August 11, 2011  
ALAN GLOVER Clerk of Court  
By C. Cooper, Deputy Clerk  
PUB: October 7, 14, 21, 28, 2011  
LV Review-Journal

Signed: Stacey M. Lewis

SUBSCRIBED AND SWORN BEFORE ME THIS, THE  
28th day of October, 2011.

Mary Lee  
Notary Public



**RENO NEWSPAPERS INC**  
**Publishers of**

**Reno Gazette-Journal**

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**Legal Advertising Office 775.788.6394**

WATSON ROUNDS  
5371 KIETZKE LN  
RENO NV 89511-2083

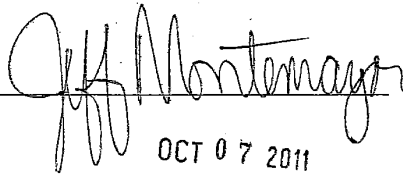
Customer Acct# 310361  
PO# NO. 5457.01  
Ad# 1000763508  
Legal Ad Cost \$442.24

STATE OF NEVADA  
COUNTY OF WASHOE

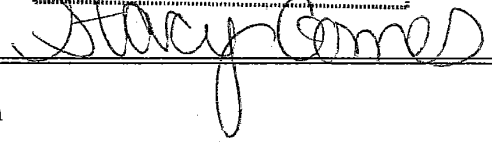
Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the dates: **09/16/2011 - 10/07/2011**, for exact publication dates please see last line of Proof of Publication below.

Subscribed and sworn to before me

Signed:

  
OCT 07 2011





**Proof of Publication**

Add'1 SUMMONS on Amended Comp In the First Judicial District Court of the State of Nevada in and for Carson City No. 090C00579 1 B Dept No. 1 JED MARGOLIN, an individual, Plaintiff, v. OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZAN DIAN aka REZA JAZI aka J. REZA 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: OPTIMA TECHNOLOGY CORPORATION, a California corporation NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plaintiff(s) 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

Ad Number: 1000763508

Page 1 of 2

184

JM\_SC1\_0542

service, file with the Clerk of the Court a written pleading in response to this Complaint. 2. Unless you respond, a default will be entered upon application of the plaintiff(s) 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 plaintiffs attorney, whose address is: Matthew D. Francis Adam McMillen Watson Rounds 5371 Kietzke Lane Reno, Nevada 89511 Date August 11, 2011 /s/ALAN GLOVER Clerk of Court Deputy Clerk No. 763508 Sept 16, 23, 30, Oct 7, 2011

Additional SUMMONS on Amended Comp  
In the First Judicial District Court of the State of Nevada  
in and for Carson City

No. 090C00579 1 B  
Dept No. 1

JED MARGOLIN, an individual,  
Plaintiff,

v.

OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZAN DIAN aka REZA JAZI aka J. REZA 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: OPTIMA TECHNOLOGY CORPORATION, a California corporation

NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plaintiff(s) against you.

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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 plaintiffs attorney, whose address is:

Matthew D. Francis  
Adam McMillen  
Watson Rounds  
5371 Kietzke Lane  
Reno, Nevada 89511  
Date August 11, 2011

/s/ALAN GLOVER  
Clerk of Court  
Deputy Clerk

No. 763508 Sept 16, 23, 30, Oct 7, 2011

P.O. Box 120191, San Diego, CA 92112-0191

**AFFIDAVIT OF PUBLICATION**

WATSON ROUNDS  
5371 KIETZKE LANE  
RENO, NV 89511

STATE OF CALIFORNIA} ss.  
County of San Diego}

The Undersigned, declares under penalty of perjury under the laws of the State of California: That she is a resident of the County of San Diego. That she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that she is not a party to, nor interested in the above entitled matter; that she is Chief Clerk for the publisher of

**The San Diego Union-Tribune**

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Sep 23, 2011, Sep 30, 2011, Oct 7, 2011, Oct 14, 2011

Chief Clerk for the Publisher

10-14-2011

Date

**Affidavit of Publication of**

Legal Advertisement  
Ad # 0010553922  
ORDERED BY: CARLA OUSBY

No. 09000579 1B

Dept No. 1

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

JED MARGOLIN,  
an individual,  
Plaintiff,

v.

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 CHONONREZA  
ZANDIAN JAZI, an  
individual, DOE  
Companies 1-10,  
DOE Corporations  
11-20, and DOE Indiv-  
iduals 21-30,  
Defendants.

THE STATE OF  
NEVADA SENDS  
GREETINGS TO:  
OPTIMA  
TECHNOLOGY  
CORPORATION, a  
California corpora-  
tion

NOTICE! YOU  
HAVE BEEN  
SUED. THIS AC-  
TION IS BROUGHT  
TO RECOVER  
DAMAGES AS A  
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THE DEFEND-  
ANTS' FRAUDU-  
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5,566,873,  
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THE COURT MAY  
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been filed by the  
plaintiff(s) against  
you.

1. If you wish to de-  
fend this lawsuit,  
you must, within 20  
days after this sum-  
mons is served on  
you, exclusive of the  
day of service, file  
with the Clerk of the  
Court a written  
pleading in response  
to this Complaint.

2. Unless you re-  
spond, a default will  
be entered upon ap-  
plication of the  
plaintiff(s) and this  
Court may enter a  
judgment against  
you for the relief de-  
manded in the com-  
plaint, which could  
result in the taking  
of money or prop-  
erty or the relief re-  
quested in the  
Complaint.

3. If you wish to seek  
the advice of an at-  
torney in this mat-  
ter, you should do so  
promptly so that  
your response may  
be filed on time.

4. You are required  
to serve your re-  
sponse upon plain-  
tiff's attorney, whose  
address is

Matthew D. Francis  
Adam McMillan  
Watson Rounds  
5371 Kietzke Lane  
Reno, Nevada 89511

ALAN GLOVER  
Clerk of Court

By C. Cooper,  
Deputy Clerk

Date August 11, 2011

ORIGINAL

REC'D & FILED ✓

No. 090C00579 1B

2011 NOV -7 PM 12:48

Dept No. 1

ALAN GLOVER

BY  CLERK  
DEPUTY

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

JED MARGOLIN, an individual,  
Plaintiff,

v.

*Add*  
**SUMMONS** on  
*Amended*  
*Complaint*

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 CHONONREZA ZANDIAN JAZI, an individual, DOE Companies 1-10, DOE Corporations 11-20, and DOE Individuals 21-30,  
Defendants. /

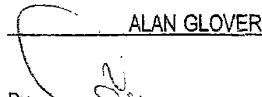
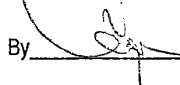
THE STATE OF NEVADA SENDS GREETINGS TO: REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI


NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plaintiff(s) 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 the Clerk of the Court a written pleading in response to this Complaint.
2. Unless you respond, a default will be entered upon application of the plaintiff(s) 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

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

 ALAN GLOVER  
Clerk of Court  
By  Deputy Clerk

Date  20 11

\*Note - When served by publication, insert a brief statement of the object of the action. See Rule 4.

RETURN OF SERVICE ON REVERSE SIDE

AFFP DISTRICT COURT  
Clark County, Nevada

AFFIDAVIT OF PUBLICATION

STATE OF NEVADA)  
COUNTY OF CLARK) SS:

Stacey M. Lewis, being 1st duly sworn, deposes and says: That she is the Legal Clerk for the Las Vegas Review-Journal and the Las Vegas Sun, daily newspapers regularly issued, published and circulated in the City of Las Vegas, County of Clark, State of Nevada, and that the advertisement, a true copy attached for,

WATSON ROUNDS 3983802WAT 7491351

was continuously published in said Las Vegas Review-Journal and / or Las Vegas Sun in 4 edition(s) of said newspaper issued from 10/07/2011 to 10/28/2011, on the following days:

- 10/07/2011
- 10/14/2011
- 10/21/2011
- 10/28/2011

NO. 090C00579 1B DEPT. NO. 1  
In the First Judicial District Court  
of the State of Nevada  
in and for Carson City

JED MARGOLIN, an individual,  
Plaintiff v. 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 CHONONREZA ZANDIAN  
JAZI, an individual, DOE Companies  
1-10, DOE Corporations 11-20, and  
DOE Individuals 21-30, Defendants

Additional SUMMONS  
ON AMENDED COMPLAINT  
THE STATE OF NEVADA SENDS  
GREETINGS TO: REZA ZANDIAN aka  
GOLAMREZA ZANDIANJAZI aka  
GHOLAM REZA ZANDIAN aka REZA  
JAZI aka J. REZA JAZI, aka G. REZA  
JAZI aka CHONONREZA ZANDIAN  
JAZI

NOTICE: YOU HAVE BEEN SUED. THIS  
ACTION IS BROUGHT TO RECOVER  
DAMAGES AS A RESULT OF THE  
DEFENDANTS' FRAUDULENT ASSIGN-  
MENT OF DOCUMENTS RELATING TO  
PATENT NO. S. 5,556,073; 5,904,724  
AND 5,978,488 AS MORE FULLY  
STATED IN THE COMPLAINT. THE  
COURT MAY DECIDE AGAINST YOU  
WITHOUT YOUR BEING HEARD

UNLESS YOU RESPOND WITHIN 20  
DAYS, READ THE INFORMATION  
BELOW

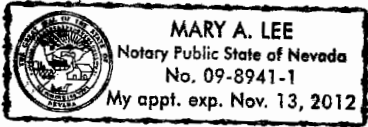
TO THE DEFENDANT: A civil  
Complaint has been filed by the  
Plaintiff(s) against you.

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 the Clerk of the Court a written  
pleading in response to this  
Complaint. 2. Unless you respond, a  
default will be entered upon  
application of the Plaintiff(s) 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 other 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  
Matthew D. Francis  
Adam McMillen  
Watson Rounds, 5371 Kietzke Lane  
Reno, Nevada 89511  
Date August 11, 2011  
ALAN GLOVER Clerk of Court  
By C. Cooper, Deputy Clerk  
PUB: October 7, 14, 21, 28, 2011  
LV Review-Journal

Signed: Stacey M. Lewis

SUBSCRIBED AND SWORN BEFORE ME THIS, THE  
28<sup>th</sup> day of October, 2011.

Mary Lee  
Notary Public



**RENO NEWSPAPERS INC**  
**Publishers of**  
**Reno Gazette-Journal**  
**955 Kuenzli St • P.O. Box 22,000 • Reno, NV 89520 • 775.788.6200**  
**Legal Advertising Office 775.788.6394**

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5371 KIETZKE LN  
RENO NV 89511-2083

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Legal Ad Cost \$455.20

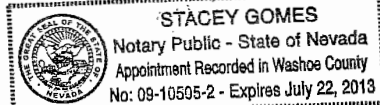
STATE OF NEVADA  
COUNTY OF WASHOE

Being first duly sworn, deposes and says: That as the legal clerk of the Reno Gazette-Journal, a daily newspaper of general circulation published in Reno, Washoe County, State of Nevada, that the notice referenced below has published in each regular and entire issue of said newspaper between the dates: **09/16/2011 - 10/07/2011**, for exact publication dates please see last line of Proof of Publication below.

Signed:

*Jeff Montemayor*  
OCT 07 2011

Subscribed and sworn to before me



*Stacey Gomes*

**Proof of Publication**

Additional SUMMONS on Amended Complaint IN THE FIRST JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR CARSON CITY No. 090C00579 1 B Dept No. 1 JED MARGOLIN, an individual, Plaintiff, v. OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZAN DIAN aka REZA JAZI aka J. REZA 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: REZA ZAN DIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been

Ad Number: 1000763515

Page 1 of 2

189

JM\_SC1\_0547



filed by the plainliff(s) 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 the Clerk of the Court a written pleading in response to this Complaint. 2. Unless you respond, a default will be entered upon application of the plaintiff(s) 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 plaintiffs attorney, whose address is: Matthew D. Francis Adam McMillen Watson Rounds 5371 Kietzke Lane Reno, Nevada 89511 /s/ALAN GLOVER Clerk of Court Date: August 11, 2011 No. 763515 Sept 16, 23, 30, Oct 7, 2011

**Additional SUMMONS on Amended Complaint  
IN THE FIRST JUDICIAL DISTRICT COURT OF THE  
STATE OF NEVADA  
IN AND FOR CARSON CITY**

No. 090C00579 1 B  
Dept No. 1

JED MARGOLIN, an individual,  
Plaintiff,

v.

OPTIMA TECHNOLOGY CORPORATION, a California corporation, OPTIMA TECHNOLOGY CORPORATION, a Nevada corporation, REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZAN DIAN aka REZA JAZI aka J. REZA 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: REZA ZAN DIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI NOTICE! YOU HAVE BEEN SUED. THIS ACTION IS BROUGHT TO RECOVER DAMAGES AS A RESULT OF THE DEFENDANTS' FRAUDULENT ASSIGNMENT OF DOCUMENTS RELATING TO PATENT NO.'S 5,566,073, 5,904,724 AND 5,978,488 AS MORE FULLY STATED IN THE COMPLAINT. 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 or petition has been filed by the plainliff(s) 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 the Clerk of the Court a written pleading in response to this Complaint.

2. Unless you respond, a default will be entered upon application of the plaintiff(s), 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 plaintiffs attorney, whose address is:

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

/s/ALAN GLOVER  
Clerk of Court

Date: August 11, 2011

No. 763515 Sept 16, 23, 30, Oct 7, 2011

P.O. Box 120191, San Diego, CA 92112-0191

**AFFIDAVIT OF PUBLICATION**

WATSON ROUNDS  
5371 KIETZKE LANE  
RENO, NV 89511

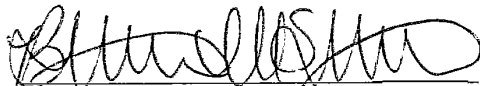
STATE OF CALIFORNIA } ss.  
County of San Diego }

The Undersigned, declares under penalty of perjury under the laws of the State of California: That she is a resident of the County of San Diego. That she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that she is not a party to, nor interested in the above entitled matter; that she is Chief Clerk for the publisher of

**The San Diego Union-Tribune**

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Sep 23, 2011, Sep 30, 2011, Oct 7, 2011, Oct 14, 2011

  
Chief Clerk for the Publisher

10-14-2011  
Date

**Affidavit of Publication of**

Legal Advertisement  
Ad # 0010554103  
ORDERED BY: CARLA OUSBY

JED MARGOLIN,  
an individual,  
Plaintiff,

v.

OPTIMA  
TECHNOLOGY  
CORPORATION, a  
California corpora-  
tion, OPTIMA  
TECHNOLOGY  
CORPORATION, a  
Nevada corporation,  
REZA ZANDIAN  
aka GOLAMREZA  
ZANDIANJAZI aka  
GHOLAM REZA  
ZANDIAN aka  
REZAJAZI  
aka J. REZA JAZI,  
aka G. REZA JAZI  
aka CHONOREZA  
ZANDIAN JAZI, an  
individual, DOE  
Companies 1-16,  
DOE Corporations  
11-20, and DOE indi-  
viduals 21-30,  
Defendants.

THE STATE OF  
NEVADA SENDS  
GREETINGS TO:  
REZA ZANDIAN  
aka GOLAMREZA  
ZANDIANJAZI aka  
GHOLAM REZA  
ZANDIAN aka  
REZA JAZI aka J.  
REZA JAZI aka G.  
REZA JAZI aka  
CHONOREZA  
ZANDIANJAZI

NOTICE! YOU  
HAVE BEEN  
SUED. THIS  
ACTION IS BROUGHT  
TO RECOVER  
DAMAGES AS A  
RESULT OF  
THE DEFEND-  
ANTS' FRAUDU-  
LENT ASSIGN-  
MENT OF DOCU-  
MENTS RELATING  
TO PATENT NO.'S  
5,944,973,  
5,984,724, AND  
5,978,488 AS MORE  
FULLY STATED IN  
THE COMPLAINT.  
THE COURT MAY  
DECIDE  
AGAINST YOU  
WITHOUT YOUR  
BEING HEARD UN-  
LESS YOU RE-  
SPOND WITHIN 20  
DAYS. READ THE  
INFORMATION  
BELOW.

TO THE DEFEND-  
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plaint or petition has  
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tiff's attorney, whose  
address is:

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

ALAN GLOVER  
Clerk of Court

By C. Cooper,  
Deputy Clerk

Date August 11, 2011

ORIGINAL

REC'D & FILED

2011 NOV -8 PM 1:31

ALAN GLOVER

BY  CLERK  
DEPUTY

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

10 **JED MARGOLIN, an individual,**  
11 **Plaintiff,**

12 **vs.**

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

20 **Defendants.**

Case No.: 090C00579 1B

Dept. No.: 1

AMENDED CERTIFICATE OF SERVICE

21  
22 Pursuant to NRCP 5(b), I certify that I am an employee of Watson Rounds, and that on  
23 November 7, 2011, I deposited for mailing, in a sealed envelope, with first-class postage  
24 prepaid, a true and correct copy of each of the following documents: 1) Summons on  
25 Amended Complaint to OPTIMA TECHNOLOGY CORPORATION, a California  
26 Corporation with Affidavits of Service by Publication from the Las Vegas Review-Journal, the  
27 Reno Gazette-Journal, and the San Diego Union-Tribune; 2) Summons on Amended  
28 Complaint to OPTIMA TECHNOLOGY CORPORATION, a Nevada Corporation with

1 Affidavits of Service by Publication from the Las Vegas Review-Journal, the Reno Gazette-  
2 Journal, and the San Diego Union-Tribune; and 3) Summons on Amended Complaint to  
3 REZA ZANDIAN aka GOLAMREZA ZANDIANJAZI aka GHOLAM REZA ZANDIAN aka  
4 REZA JAZI aka J. REZA JAZI aka G. REZA JAZI aka CHONONREZA ZANDIAN JAZI  
5 with Affidavits of Service by Publication from the Las Vegas Review-Journal, the Reno  
6 Gazette-Journal, and the San Diego Union-Tribune to:

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

12 Dated: November 7, 2011

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

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