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10 *Attorneys for Plaintiffs/Counter-Defendants, Fred Sadri, both in his individual capacity and as*  
11 *Trustee for The Star Living Trust, dated April 14, 1997; Ray Koroghli individually; Ray*  
12 *Koroghli and Sathsowi T. Koroghli, as Managing Trustees for Koroghli Management Trust*

13 **UNITED STATES BANKRUPTCY COURT**  
14 **DISTRICT OF NEVADA**

15 In re: JAZI GHOLAMREZA ZANDIAN,  
16  
17 Debtor.

**Case No.: N-16-50644-btb**

**CHAPTER 15**

18 FRED SADRI, AS TRUSTEE FOR THE STAR  
19 LIVING TRUST, DATED APRIL 14, 1997;  
20 RAY KOROGHLI AND SATHSOWI T.  
21 KOROGHLI, AS MANAGING TRUSTEES  
22 FOR KOROGHLI MANAGEMENT TRUST,

**Adv. No. 17-05016-btb**

**FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
JED MARGOLIN**

23 Plaintiffs,

24 vs.

25 JED MARGOLIN; JAZI GHOLAMREZA  
26 ZANDIAN; and all other parties claiming an  
27 interest in real properties described in this  
28 action,

Defendants.

PATRICK CANET,

Counterclaimant,

vs.

FRED SADRI INDIVIDUALLY AND IN HIS  
CAPACITY AS TRUSTEE OF THE STAR  
LIVING TRUST AND RAY KOROGHLI

1 INDIVIDUALLY, AND RAY KOROGHLI  
2 AND SATHSOWI T. KOROGHLI AS  
3 MANAGING TRUSTEES OF THE  
4 KOROGHLI MANAGEMENT TRUST,

5 Counter-Defendants.

6 PATRICK CANET,

7 Cross-Claimant,

8 v.

9 JED MARGOLIN,

10 Cross-Defendant.

11 Pursuant to the Federal Rules of Civil Procedure (F.R.C.P.) Rule 34, Plaintiff/Counter-  
12 Defendants, Fred Sadri, both in his individual capacity and as Trustee for The Star Living Trust,  
13 dated April 14, 1997; Ray Koroghli individually; Ray Koroghli and Sathsowi T. Koroghli, as  
14 Managing Trustees for Koroghli Management Trust request that Defendant, Jed Margolin  
15 respond to this this First Set of Requests for Production of Documents within thirty (30) days  
16 from the date of service. within thirty (30) days from the date of service.

17 **DEFINITIONS**

18 **A.** The following definitions apply to this discovery request:

- 19 **1.** Communication. The term “communication” means the transmittal or information (in  
20 the form of facts, ideas, inquiries, or otherwise) and shall embrace and include all  
21 written communications and other communications including without limitation every  
22 discussion, conversation, conference, meeting, interview, telephone call, or doctor,  
23 and any other professional service visit.
- 24 **2.** Concerning. The term “concerning” means relating to, referring to, describing,  
25 evidencing or constituting.
- 26 **3.** YOU, YOUR, and Margolin. As used herein, unless otherwise indicated, the terms  
27 “YOU,” “YOUR” and “Margolin” refer to Defendant Jed Margolin and any and all of  
28 his agents, representatives, employees, partners, and counsels.

- 1           **4.** Document or Documents. The term “Document” or “Documents” is defined to be  
2           synonymous in meaning and equal in scope to the use of the terms “document” and  
3           “electronically stored information” in Federal Rules of Civil Procedure 26 and 34. A  
4           draft or non-identical copy is a separate document within the meaning of this term.
- 5           **5.** Identify (with respect to documents). When referring to documents, “identify” means  
6           to provide information, to the extent known, as to the (a) type of document; (b)  
7           general subject matters; (c) date of the document; (d) author(s), addressee(s) and  
8           recipient(s) of the document; and (e) location of the document with sufficient  
9           particularity to allow for it to be obtained by means of a request for production for  
10          that document.
- 11          **6.** Identify (with respect to persons or entities). When referring to a person or entity,  
12          “identify” means to provide information, to the extent known, as to the person or  
13          entity’s full name, present or last known address, zip code, and telephone number.  
14          When referring to a natural person, “identify” also means to provide information as to  
15          the last known place of employment, business address, and telephone number. Once  
16          a person has been identified in accordance with this subparagraph, only the name of  
17          that person need be listed in response to subsequent discovery requesting the  
18          identification of that person.
- 19          **7.** Parties. The terms “Plaintiff,” “Defendant,” as well as a party’s full or abbreviated  
20          name or a pronoun referring to a party means the party and, where applicable, its  
21          agents, representatives, officers, directors, employees, partners, corporate parent,  
22          subsidiaries, and affiliates.
- 23          **8.** Person. The term “Person” is defined as any natural person or business, legal, or  
24          governmental entity or association.
- 25          **9.** Property. The term “Property” refers to Parcels 2, 4 and 8 as defined under Paragraph  
26          1 in Plaintiffs’ Complaint filed in this action on May 25, 2017 [ECF No.1].

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- 10. Debtor or Zandian.** The terms “Debtor” or “Zandian” refers to Jazi Gholamreza Zandian, the Chapter 15 Debtor in Case No. 16-50644-btb before the U.S. Bankruptcy Court for Nevada.
- 11. Foreign Representative or Canet.** The terms “Foreign Representative” and “Canet” refers to Patrick Canet, in his capacity as Foreign Representative in Case No. 16-50644-btb before the U.S. Bankruptcy Court for Nevada.
- 12. Sheriff or Wood.** The terms “Sheriff” or “Wood” refers to Steven Wood or any other agent of Sheriff, Chuck Allen, conducting sale on behalf of YOU for the Property.
- 13. JCAA.** The abbreviation “JCAA” refers to the Judgment Confirmation Arbitration Award recorded on June 22, 2007 in the official records of Washoe County Recorder’s Office as Instrument Number 3547263.
- 14. Quitclaim Deed.** The term “Quitclaim Deed” refers to the Quitclaim Claim Deed recorded on May 12, 2009 in the official records of Washoe County Recorder’s Office as Instrument Number 3758659.
- 15. Clark Stipulated Judgment.** The term “Clark Stipulated Judgment” refers to the Stipulation for Final Resolution of Litigation recorded on July 20, 2009 in the official records of Clark County Recorder’s Office as Instrument Number 20090720-0003600.
- 16. Washoe Default Judgment.** The term “Washoe Default Judgment” refers to the Default Judgment recorded by YOU on August 16, 2013 in the official records of Washoe County Recorder’s Office as Instrument Number 4269631.
- 17. Clark Default Judgment.** The term “Clark Default Judgment” refers to the Default Judgment recorded by YOU on August 20, 2013 in the official records of Elko County Recorder’s Office as Instrument Number 201308200001370.
- 18. Execution Sale and Auction.** The phrases “Execution Sale” and “Auction” refer to the sale conducted on the Property on or about April 3, 2015 by Steven Wood, as authorized agent for Sheriff, Chuck Allen.

1 **19.** Writings and Recordings. The term “Writings” and “Recordings” and the plural  
2 forms thereof shall mean and include, but shall not be limited to, all letters, words or  
3 numbers, or their equivalent, set down by handwriting, typewriting, Photostatting,  
4 photographing, magnetic impulse, mechanical, or electronic recording, or other form  
5 of data compilation, however produced or reproduced, in YOUR possession, custody,  
6 or control, or to which YOU have or have had access.

7 **20.** Any term, word or phrase that has not been defined in this discovery request but  
8 appears in the live pleadings in this action (including without limitation the  
9 Complaint) shall be given the definition or meaning given to the term, word, or  
10 phrase as used in the live pleadings. Any term, word, or phrase that has been defined  
11 in these definitions that also appears in the live pleadings shall be given the definition  
12 or meaning given to the term, word or phrase as used in the pleadings in addition to  
13 the definition(s) given in this discovery request.

14 **INSTRUCTIONS**

- 15 1. If YOU discover new information, YOU are obligated to supplement YOUR responses to  
16 these Requests for Production of Documents no later than thirty days after the discovery  
17 of the further information and in no event later than the date set within the case  
18 management order for supplementing the response.
- 19 2. If YOU object to furnishing any information requested by these Requests for Production  
20 of Documents on the grounds of privilege, work product or otherwise, YOUR response  
21 should state the existence of the information, document or communication, identify the  
22 specific grounds on which YOUR objection is based, and identify the information  
23 objected to by furnishing its date, participants (*e.g.*, names of attendees, speakers,  
24 authors, recipients, addressees) and a general description of the nature, rather than the  
25 substance, of the purportedly privileged information. If the information objected to  
26 contains relevant non-objectionable matter, YOU should disclose it.

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1 3. The relevant time period of these Requests for Production of Documents is from October  
2 2003 to the date of the response, and shall include all information which relates or refers  
3 to this period, unless another time or period of time is specifically referred to in a Request  
4 for Production of Documents.

5 4. If YOU cannot furnish exact data, such as dates, periods or amounts, supply estimated  
6 data to the extent possible and indicate that the data is estimated.

7 **DOCUMENT REQUESTS**

8 **REQUEST FOR PRODUCTION NO. 1:**

9 Any and all Documents YOU sent to or received from Plaintiffs or their attorneys, agents,  
10 employees or representatives regarding the Property, prior to and after the Execution Sale.

11 **REQUEST FOR PRODUCTION NO. 2:**

12 Any and all Documents YOU sent to or received from Zandian or his attorneys, agents,  
13 employees or representatives regarding the Property, prior to and after the Execution Sale.

14 **REQUEST FOR PRODUCTION NO. 3:**

15 Any and all Documents YOU sent to or received from Sheriff or his attorneys, agents,  
16 employees or representatives regarding the Property, prior to and after the Execution Sale.

17 **REQUEST FOR PRODUCTION NO. 4:**

18 Any and all title insurance policies, reports or products in YOUR possession for the  
19 Property.

20 **REQUEST FOR PRODUCTION NO. 5:**

21 Any and all Documents which support YOUR contention that the Execution Sale was  
22 valid.

23 **REQUEST FOR PRODUCTION NO. 6:**

24 Any and all Documents which support YOUR contention that the Sheriff or its agents and  
25 assigns complied with all statutory notice requirements in conducting the Execution Sale.

26 **REQUEST FOR PRODUCTION NO. 7:**

27 Produce all Documents reflecting, relating to, or concerning the Execution Sale against  
28 the Property.

1 **REQUEST FOR PRODUCTION NO. 8:**

2 Produce all Documents regarding any rent or other income received by YOU related to  
3 the Property, including any and all lease or rental agreements regarding the Property that YOU  
4 have entered into prior to or after the Execution Sale.

5 **REQUEST FOR PRODUCTION NO. 9:**

6 Produce all Documents that YOU referenced, identified, referred to, or consulted in  
7 responding to Plaintiffs' First Set of Interrogatories to YOU.

8 **REQUEST FOR PRODUCTION NO. 10:**

9 Produce YOUR entire file regarding or related to the Property.

10 **REQUEST FOR PRODUCTION NO. 11:**

11 Provide all Documents YOU reviewed, prior to the Execution Sale, from the Plaintiffs,  
12 Zandian, Sheriff, or any third-party relating to the Execution Sale of the Property.

13 **REQUEST FOR PRODUCTION NO. 12:**

14 Produce all Documents in YOUR possession demonstrating that any party with claim in  
15 the Property was/were aware, or should have been aware, of the Auction of the Property.

16 **REQUEST FOR PRODUCTION NO. 13:**

17 Produce all Documents in YOUR possession demonstrating amounts YOU have spent to  
18 maintain, repair, or improve the Property.

19 **REQUEST FOR PRODUCTION NO. 14:**

20 Produce all Documents in YOUR possession demonstrating amounts YOU have paid for  
21 all taxes, insurance and homeowners' association dues on the Property.

22 **REQUEST FOR PRODUCTION NO. 15:**

23 Provide a copy of any agreement(s) or contract(s) identified in YOUR Response to  
24 Interrogatory No. 16.

25 **REQUEST FOR PRODUCTION NO. 16:**

26 Provide a copy of any written instruction or disclosure given to YOU at the Execution  
27 Sale.

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1 **REQUEST FOR PRODUCTION NO. 17:**

2 Provide all Documents related to policies of hazard insurance on the Property, including  
3 proof of payment by YOU of all premiums and any claims made upon the Policies.

4 **REQUEST FOR PRODUCTION NO. 18:**

5 For each response to the Request for Admissions that is not an unqualified admission,  
6 produce any and all Documents which support YOUR response.

7 **REQUEST FOR PRODUCTION NO. 19:**

8 Produce any and all valuations, broker's price opinions (BPOs), and appraisals of the  
9 Property, created before or after YOU purchased the Property.

10 **REQUEST FOR PRODUCTION NO. 20:**

11 Produce all Documents that identify what YOU believed to be the fair market value of  
12 the Property at the time of YOUR purchase of the Property, including the reasons for YOUR  
13 belief.

14  
15 DATED this 28th day of November, 2017.

16 WRIGHT, FINLAY & ZAK, LLP

17 /s/ Yanxiong Li, Esq.

18 Dana Jonathon Nitz, Esq.

19 Federal Bar No. 0050

20 Yanxiong Li, Esq.

21 Federal Bar No. 12807

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24 *Attorneys for Plaintiffs/Counter-Defendants, Fred*  
25 *Sadri, both in his individual capacity and as Trustee*  
26 *for The Star Living Trust, dated April 14, 1997; Ray*  
27 *Koroghli individually; Ray Koroghli and Sathsovi*  
28 *T. Koroghli, as Managing Trustees for Koroghli*  
*Management Trust*

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**CERTIFICATE OF SERVICE**

Pursuant to F.R.C.P. 5(b), I certify that I am an employee of WRIGHT, FINLAY & ZAK, LLP, and that on this 28th day of November, 2017, I did cause a true copy of **FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO JED MARGOLIN** to be served by depositing it in U.S. Mail, postage prepaid, to the addresses below:

Matthew D. Francis, Esq..  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
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*Attorney for Jed Margolin*

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HARTMAN & HARTMAN  
510 West Plumb Lane, Suite B1  
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*Attorney for Patrick Canet, Foreign Representativa  
and Jazi Gholamreza Zandian*

/s/ Kelli Wightman  
An Employee of WRIGHT, FINLAY & ZAK, LLP