

1 WRIGHT, FINLAY & ZAK, LLP  
2 Dana Jonathon Nitz, Esq.  
3 Nevada Bar No. 0050  
4 Edgar C. Smith, Esq.  
5 Nevada Bar No. 5506  
6 Yanxiong Li, Esq.  
7 Nevada Bar No. 12807  
8 7785 W. Sahara Ave., Suite 200  
9 Las Vegas, NV 89117  
10 (702) 475-7964; Fax: (702) 946-1345  
11 [yli@wrightlegal.net](mailto:yli@wrightlegal.net)

12 *Attorneys for Plaintiffs, Fred Sadri, individually and as Trustee for The Star Living Trust, dated*  
13 *April 14, 1997; Ray Koroghli, individually; Ray Koroghli and Sathsowi T. Koroghli, as*  
14 *Managing Trustees for Koroghli Management Trust*

15 **UNITED STATES BANKRUPTCY COURT**  
16 **DISTRICT OF NEVADA**

17 In re: JAZI GHOLAMREZA ZANDIAN,  
18  
19 Debtor.

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

**CHAPTER 15**

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

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

**PLAINTIFFS' RESPONSES TO  
DEFENDANT JED MARGOLIN'S  
FIRST SET OF REQUESTS FOR  
ADMISSIONS**

25 Plaintiffs,

26 vs.

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

Defendants.

PATRICK CANET,

Counterclaimant,

vs.

1 FRED SADRI INDIVIDUALLY AND IN HIS  
2 CAPACITY AS TRUSTEE OF THE STAR  
3 LIVING TRUST AND RAY KOROGHLI  
4 INDIVIDUALLY, AND RAY KOROGHLI  
5 AND SATHSOWI T. KOROGHLI AS  
6 MANAGING TRUSTEES OF THE  
7 KOROGHLI MANAGEMENT TRUST,

8 Counter-Defendants.

9 PATRICK CANET,

10 Cross-Claimant,

11 v.

12 JED MARGOLIN,

13 Cross-Defendant.

14 COME NOW, Plaintiffs/Counter-Defendants, Fred Sadri, as Trustee for The Star Living  
15 Trust, dated April 14, 1997 (“SLT”) and Ray Koroghli and Sathsowi T. Koroghli, as Managing  
16 Trustees for Koroghli Management Trust (“KMT” and collectively with “SLT” hereinafter as  
17 “Plaintiffs”), by and through their counsel, the law firm of Wright, Finlay & Zak, LLP, and  
18 hereby submit their responses to Defendant Jed Margolin’s (“Margolin”) First Set of Requests  
19 for Admissions.

20 **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

21 Plaintiffs’ responses herein to Margolin’s First Set of Requests for Admissions (the  
22 “Responses”) are subject to the following general objections (the “General Objections”). The  
23 General Objections may be specifically referred to in the Responses for the purpose of clarity.  
24 The failure to specifically incorporate a General Objection, however, should not be construed as  
25 a waiver of the General Objections.

26 1. Nothing herein shall be construed as an admission or waiver by Plaintiffs of: (a)  
27 their rights respecting admissibility, competency, relevance, privilege, materiality, and  
28 authenticity of any information provided in the Responses, any documents identified therein, or  
the subject matter thereof; (b) their objection due to vagueness, ambiguity, or undue burden; and

1 (c) their rights to object to the use of any information provided in the Responses, any document  
2 identified therein, or the subject matter contained in the Responses during a subsequent  
3 proceeding, including the trial of this or any other action.

4 2. The Responses are made solely for the purposes of, and in relation to, this  
5 litigation.

6 3. Plaintiffs object to the Requests for Admissions to the extent they seek  
7 documents and information protected by the attorney-client privilege and/or seeks the work  
8 product of counsel.

9 4. Plaintiffs have not completed: (a) their investigation of facts, witnesses, or  
10 documents relating to this case, (b) discovery in this action, (c) their analysis of available data,  
11 and (d) their preparations for trial. Thus, although a good faith effort has been made to supply  
12 pertinent information where the same has been requested, it is not possible in some instances for  
13 unqualified Responses to be made to the Discovery Requests. Further, the Responses are  
14 necessarily made without prejudice to Plaintiffs' right to produce evidence of subsequently  
15 discovered fact, witnesses, or documents, as well as any new theories or contentions that  
16 Plaintiffs may adopt. The Responses are further given without prejudice to Plaintiffs' right to  
17 provide information concerning facts, witnesses, or documents omitted by the Responses as a  
18 result of oversight, inadvertence, good faith error, or mistake. Plaintiffs have responded to the  
19 Requests based on information that is presently available to them and to the best of their  
20 knowledge to date. The Responses may include hearsay and other forms of evidence that may  
21 be neither reliable nor admissible.

22 Without waiving their General Objections, Plaintiffs respond to the Requests for  
23 Admissions as follows:

24 **REQUESTS FOR ADMISSIONS**

25 **REQUEST NO. 1:**

26 Admit that a Judgment Confirming Arbitration Award was recorded in Washoe County in  
27 June 2007 as Doc # 4747575.

28 ///

1 **RESPONSE TO REQUEST NO. 1:**

2 In addition to the General Objections, Plaintiffs further object to this Request on the  
3 grounds that it is vague and ambiguous, and seeks information that is neither relevant nor  
4 proportional to the needs of this case.

5 Without waiving any objections, Plaintiffs respond: Deny.

6 **REQUEST NO. 2:**

7 Admit that the Order on Stipulation For Final Resolution of Litigation (“Stipulated  
8 Agreement”) was not recorded in Washoe County until September 2017 (Washoe County Doc  
9 #4747575).

10 **RESPONSE TO REQUEST NO. 2:**

11 In addition to the General Objections, Plaintiffs further object to this Request on the  
12 grounds that it is vague and ambiguous, and seeks information that is neither relevant nor  
13 proportional to the needs of this case.

14 Without waiving any objections, Plaintiffs respond: Deny.

15 **REQUEST NO. 3:**

16 Admit that three of the properties in Washoe County (APN 079-150-10, APN 084-04002,  
17 and APN 084-130-07) that MARGOLIN bought at public auction were subject to the Judgment  
18 Confirming Arbitration Award that was recorded in Washoe County in June 2007 as Doc #  
19 4747575.

20 **RESPONSE TO REQUEST NO. 3:**

21 In addition to the General Objections, Plaintiffs further object to this Request on the  
22 grounds that it is vague and ambiguous as to the phrase “subject to,” overbroad as to scope and  
23 time, and seeks information that is neither relevant nor proportional to the needs of this case.

24 Without waiving any objections, Plaintiffs respond: Deny.

25 **REQUEST NO. 4:**

26 Admit that the auction where MARGOLIN purchased the properties that are the subject  
27 of Your Adversary Complaint was conducted in April of 2015.

28 ///

1 **RESPONSE TO REQUEST NO. 4:**

2 In addition to the General Objections, Plaintiffs further object to this Request on the  
3 grounds that it is vague and ambiguous. This Request is further objected to on the grounds that it  
4 seeks information outside of the possession and control of Plaintiffs.

5 Without waiving any objections, Plaintiffs respond: Deny.

6 **REQUEST NO. 5:**

7 Admit that You had knowledge that MARGOLIN had obtained a Writ of Execution  
8 against the properties that are the subject of Your Adversary Complaint.

9 **RESPONSE TO REQUEST NO. 5:**

10 In addition to the General Objections, Plaintiffs further object to this Request on the  
11 grounds that it is vague, ambiguous and overly broad as to scope and time. This Request is  
12 further objected to on the grounds that it seeks information that is neither relevant nor  
13 proportional to the needs of this case.

14 Without waiving any objections, Plaintiffs respond: Plaintiffs are unable to answer this  
15 Request without further clarification as to the relevant time period, and therefore state: Deny.

16 **REQUEST NO. 6:**

17 Admit that You had knowledge that a Sheriff's auction was to be held before the auction  
18 was held.

19 **RESPONSE TO REQUEST NO. 6:**

20 In addition to the General Objections, Plaintiffs further object to this Request on the  
21 grounds that it is vague and ambiguous as to the phrase/term "Sheriff's auction" and "auction,"  
22 and is incomprehensible due to these undefined phrase/term. This Request is also overly broad  
23 as to time and scope. This Request is further objected to on the grounds that it seeks information  
24 that is neither relevant nor proportional to the needs of this case.

25 Without waiving any objections, Plaintiffs respond: Plaintiffs are unable to answer this  
26 Request without further clarification as to the phrase/term "Sheriff's auction" and "auction," and  
27 therefore state: Deny.

28 ///

1 **REQUEST NO. 7:**

2 Admit that since at least 2013 You have stated on one or more occasions an interest in  
3 purchasing MARGOLIN's Judgment against Zandian either wholly or in part but that You have  
4 never made an offer.

5 **RESPONSE TO REQUEST NO. 7:**

6 In addition to the General Objections, Plaintiffs further object to this Request on the  
7 grounds that it is compound, overly broad and seeks information that is neither relevant nor  
8 proportional to the needs of this case. This Request is also vague and ambiguous as to the phrase  
9 "MARGOLIN's Judgment against Zandian," which is not defined. This Request is further  
10 objected to as it seeks inadmissible facts related to compromise negotiations in violation of Fed.  
11 R. Evid. 408.

12 Without waiving any objections, Plaintiffs respond: Deny.

13 **REQUEST NO. 8:**

14 Admit that You have had one or more communications with Zandian since the CANET  
15 Chapter 15 Petition was filed in U.S. Bankruptcy Court in May of 2016.

16 **RESPONSE TO REQUEST NO. 8:**

17 In addition to the General Objections, Plaintiffs further object to this Request on the  
18 grounds that it is vague, overly broad and seeks information that is neither relevant nor  
19 proportional to the needs of this case.

20 Without waiving any objections, Plaintiffs respond: Admit.

21 **REQUEST NO. 9:**

22 Admit that You have produced all Documents and things pursuant to Defendant Jed  
23 Margolin's First Set of Requests for Production to Plaintiffs.

24 **RESPONSE TO REQUEST NO. 9:**

25 Subject to General Objections, Plaintiffs respond: Admit.

26 **REQUEST NO. 10:**

27 Admit that all Documents and things You have produced pursuant to Defendant Jed  
28 Margolin's First Set of Requests for Production to Plaintiffs are authentic.

1 **RESPONSE TO REQUEST NO. 10:**

2 In addition to the General Objections, Plaintiffs further object to this Request on the  
3 grounds that it is overly broad and unduly burdensome, and information sought that is neither  
4 relevant nor proportional to the needs of this case. Plaintiffs object to the extent this Request  
5 seeks admission of a legal conclusion. Wagner v. St. Paul Fire & Marine Ins. Co., 238 F.R.D.  
6 418 (N.D. W.Va. 2006) (parties may not request admissions concerning purely matters of law).  
7 Plaintiffs further objects to this Request to the extent they lack personal knowledge as to all  
8 documents served concurrently with their answers to Margolin’s Request for Production.

9 Without waiving any objections, Plaintiffs respond: they are unable to admit or deny  
10 without further clarification, and therefore state: Deny.

11 **REQUEST NO. 11:**

12 Admit that MARGOLIN did properly record a copy of the Default Judgment at the  
13 Washoe County Recorder’s Office in accordance with NRS 17.150.

14 **RESPONSE TO REQUEST NO. 11:**

15 In addition to the General Objections, Plaintiffs further object to this Request on the  
16 grounds that it is vague and ambiguous as the term “properly” is not defined. Furthermore,  
17 Plaintiffs object to the extent this Request seeks admission of a legal conclusion. Wagner v. St.  
18 Paul Fire & Marine Ins. Co., 238 F.R.D. 418 (N.D. W.Va. 2006) (parties may not request  
19 admissions concerning purely matters of law).

20 Without waiving any objections, Plaintiffs respond: Deny.

21 **REQUEST NO. 12:**

22 Admit that, prior to the execution sales, other than publication (which is evidenced by the  
23 proofs of publication produced in discovery by MARGOLIN), no additional notice to any third  
24 party is required by law.

25 ///

26 ///

27 ///

28 ///

1 **RESPONSE TO REQUEST NO. 12:**

2 In addition to the General Objections, Plaintiffs object to the extent this Request seeks  
3 admission of a legal conclusion. Wagner v. St. Paul Fire & Marine Ins. Co., 238 F.R.D. 418  
4 (N.D. W.Va. 2006) (parties may not request admissions concerning purely matters of law).

5 Without waiving any objections, Plaintiffs respond: Deny.

6 **REQUEST NO. 13:**

7 Admit that prior to execution sales, no notice was required to be served upon SLT and/or  
8 KMT.

9 **RESPONSE TO REQUEST NO. 13:**

10 In addition to the General Objections, Plaintiffs object to the extent this Request seeks  
11 admission of a legal conclusion. Wagner v. St. Paul Fire & Marine Ins. Co., 238 F.R.D. 418  
12 (N.D. W.Va. 2006) (parties may not request admissions concerning purely matters of law).

13 Without waiving any objections, Plaintiffs respond: Deny.

14 **REQUEST NO. 14:**

15 Admit the Sheriff's sales, referred to in paragraph 39 of the COMPLAINT, were valid.

16 **RESPONSE TO REQUEST NO. 14:**

17 In addition to the General Objections, Plaintiffs object to the extent this Request seeks  
18 admission of a legal conclusion. Wagner v. St. Paul Fire & Marine Ins. Co., 238 F.R.D. 418  
19 (N.D. W.Va. 2006) (parties may not request admissions concerning purely matters of law).

20 Without waiving any objections, Plaintiffs respond: Deny.

21 **REQUEST NO. 15:**

22 Admit that an affidavit referred to in NRS 17.150(4) is not required for a lien to be valid.

23 **RESPONSE TO REQUEST NO. 15:**

24 In addition to the General Objections, Plaintiffs further object to this Request on the  
25 grounds that it is vague, ambiguous, overly broad and unlimited in scope and time; therefore, this  
26 Request is not reasonably proportional to the needs of this case. Furthermore, Plaintiffs object to  
27 the extent this Request seeks admission of a legal conclusion. Wagner v. St. Paul Fire & Marine

28

1 Ins. Co., 238 F.R.D. 418 (N.D. W.Va. 2006) (parties may not request admissions concerning  
2 purely matters of law).

3 Without waiving any objections, Plaintiffs respond: Deny.

4 **REQUEST NO. 16:**

5 Admit that NRS 17.150(2) makes it clear that a lien on real property comes into existence  
6 upon the recordation of the judgment.

7 **RESPONSE TO REQUEST NO. 16:**

8 In addition to the General Objections, Plaintiffs further object to this Request on the  
9 grounds that it is vague and ambiguous, overly broad and unlimited in scope and time; therefore,  
10 this Request is not reasonably proportional to the needs of this case. Furthermore, Plaintiffs  
11 object to the extent this Request seeks admission of a legal conclusion. Wagner v. St. Paul Fire &  
12 Marine Ins. Co., 238 F.R.D. 418 (N.D. W.Va. 2006) (parties may not request admissions  
13 concerning purely matters of law).

14 Without waiving any objections, Plaintiffs respond: Deny.

15 **REQUEST NO. 17:**

16 Admit that the Nevada Supreme Court in *Leven v. Frey*, 123 Nev. 399, 403 (2007) stated  
17 “NRS 17.150(2) creates a lien on a debtor’s real property in a particular county when a judgment  
18 is recorded in that county.”

19 **RESPONSE TO REQUEST NO. 17:**

20 In addition to the General Objections, Plaintiffs object to the extent this Request is  
21 compound and complex, and seeks admission of a legal conclusion. Wagner v. St. Paul Fire &  
22 Marine Ins. Co., 238 F.R.D. 418 (N.D. W.Va. 2006) (parties may not request admissions  
23 concerning purely matters of law).

24 Without waiving any objections, Plaintiffs respond: Deny.

25 **REQUEST NO. 18:**

26 Admit that because a notice of the Sheriff’s sale was published in accord with NRS  
27 21.130(1)(c)(3), You received notice of the execution sale.

28 ///

1 **RESPONSE TO REQUEST NO. 18:**

2 In addition to the General Objections, Plaintiffs further object to this Request on the  
3 grounds that it is compound, vague and ambiguous as the phrase “Sheriff’s sale” is not defined,  
4 overly broad and unlimited in scope and time. Furthermore, Plaintiffs object to the extent this  
5 Request seeks admission of a legal conclusion. Wagner v. St. Paul Fire & Marine Ins. Co., 238  
6 F.R.D. 418 (N.D. W.Va. 2006) (parties may not request admissions concerning purely matters of  
7 law).

8 Without waiving any objections, Plaintiffs respond: Deny.

9  
10 DATED this 22nd day of February, 2018.

11 WRIGHT, FINLAY & ZAK, LLP

12  
13 /s/ Yanxiong Li, Esq.  
14 Dana Jonathon Nitz, Esq.  
15 Nevada Bar No. 0050  
16 Edgar C. Smith, Esq.  
17 Nevada Bar No. 5506  
18 Yanxiong Li, Esq.  
19 Nevada Bar No. 12807  
20 7785 W. Sahara Ave., Suite 200  
21 Las Vegas, NV 89117  
22 Tel: (702) 475-7964  
23 Fax: (702) 946-1345  
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 and Sathsowi T. Koroghli, in their*  
28 *individual capacities as well as Managing Trustees*  
*for Koroghli Management Trust*

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP, and  
3 that service of the foregoing **PLAINTIFFS' RESPONSES TO DEFENDANT JED**  
4 **MARGOLIN'S FIRST SET OF REQUESTS FOR ADMISSIONS** was made on this 22nd  
5 day of February, 2018, through the CM/ECF Electronic Filing system, and/or by depositing a  
6 true and correct copy in the United States Mail, addressed as follows:

7  
8 Adam McMillen, Esq..  
9 BROWNSTEIN HYATT FARBER SCHRECK, LLP  
10 5371 Kietzke Lane  
11 Reno, NV 89511  
12 *Attorney for Jed Margolin*

13 Jeffrey L. Hartman, Esq.  
14 HARTMAN & HARTMAN  
15 510 West Plumb Lane, Suite B  
16 Reno, NV 89509  
17 *Attorney for Patrick Canet, Foreign Representativa*  
18 *and Jazi Gholamreza Zandian*

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

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