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11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 IN RE:
14 PATRICK CANET AND JAZI
15 GHOLAMREZA ZANDIAN,
16 Debtors.

Case No. BK-N-16-50644-BTB

Chapter 15

DECLARATION OF MATTHEW D. FRANCIS
IN SUPPORT OF MOTION TO DISMISS
CHAPTER 15 CASE

Hearing Date: October 1, 2019
Hearing Time: 2:00 PM
Estimated Time for hearing: 1 hour

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18
19 I, Matthew D. Francis do hereby declare and state as follows:

20
21 1. I am a partner at the law firm of Brownstein Hyatt Farber Schreck, LLP, and counsel of
22 record in this action. I have personal knowledge of the facts which are hereinafter related and
23 make this Declaration on the basis of such personal knowledge. If called to testify at any hearing
24 or trial regarding the above-matter, I swear I could testify competently to the matters stated
25 herein. This Declaration is made in support of Jed Margolin's Motion to Dismiss Chapter 15
26 Case for Want of Prosecution.

27 2. Attached hereto as Exhibit A is a true and correct copy of a September 6, 2016
28 Transcript of Application Verified Petition for Recognition and Chapter 15 Relief filed by Jeffrey

BROWNSTEIN HYATT FARBER SCHRECK, LLP
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Reno, NV 89511
775.324.4100

1 L. Hartman on Behalf of Patrick Canet.

2 3. Attached hereto as Exhibit B is a true and correct copy of an email chain between Reza
3 Zandian and Adam McMillen, the original message from Reza Zandian of which is dated April
4 12, 2016.

5 4. Attached hereto as Exhibit C is a true and correct copy of a French Judgment entered
6 July 20, 2005 with translation and Certificate of Translation.

7 5. Attached hereto as Exhibit D is a true and correct copy of the Response of Patrick
8 Canet to Defendant Jed Margolin's First Set of Requests for Admissions.

9 6. Attached hereto as Exhibit E is a true and correct copy of a French Judgment entered
10 November 28, 2011 with translation and Certificate of Translation.

11 7. Attached hereto as Exhibit F is a true and correct copy of a publication from the Office
12 of Foreign Assets Control List of Persons Identified as Blocked Solely Pursuant to Executive
13 Order 13599, dated January 16, 2016.

14 8. Attached hereto as Exhibit G is a true and correct copy of a press release from the U.S.
15 Department of the Treasury Fact Sheet: Designation of Iranian Entities and Individuals for
16 Proliferation Activities and Support for Terrorism, dated 10/25/2007.

17 I declare under penalty of perjury that the foregoing is true and correct.

18 DATED: This 30th day of July, 2019.

19
20 BROWNSTEIN HYATT FARBER SCHRECK, LLP

21 By: /s/Matthew D. Francis

22 Matthew D. Francis

23 Arthur A. Zorio

24 Samantha J. Reviglio

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and on this 30th day of July, 2019, I served the document entitled **DECLARATION OF MATTHEW D. FRANCIS IN SUPPORT OF MOTION TO DISMISS CHAPTER 15 CASE** on the parties listed below via the following:

Dana Jonathon Nitz, Esq.
Yanxiong Li, Esq.
Wright, Finlay & Zak, LLP
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Las Vegas, NV 89117
yli@wrightlegal.net

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HARMAN & HARTMAN
510 West Plumb Lane, Suite B
Reno, NV 89509
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VIA FIRST CLASS U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada, addressed to the foregoing parties.

BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

VIA COURIER: by delivering a copy of the document to a courier service for over-night delivery to the foregoing parties.

VIA ELECTRONIC SERVICE: by electronically filing the document with the Clerk of the Court using the CM/ECF system which served the foregoing parties electronically.

/s/ Jeff Tillison
Employee of Brownstein Hyatt Farber
Schreck, LLP

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