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Elizabeth A. Brown
Clerk of Supreme Court

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Attorneys for plaintiffs/counter-defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC, a
Nevada limited-liability company,

Plaintiffs,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual; ALI
MOJTAHED, an individual; DOES I through X,
and ROE CORPORATIONS I though X, inclusive,

Defendants.

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited-liability company; MOHAMMAD
MOJTAHED individually and derivatively on
behalf of MEDITEX, LLC, a Nevada limited-
liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI, an
individual; UTSAFETY, LLC, a Utah limited-
liability company; DOES I through X, and ROE
CORPORATIONS I though X, inclusive,

Counter-Defendants.

Case No.: A-15-729030-B
Dept No.: 13

**PLAINTIFFS'/COUNTER-
DEFENDANTS' NOTICE OF APPEAL**

1 Notice is hereby given that plaintiffs/counter-defendants Parviz Safari, Mandana Zahedi,
2 and Nooshin Zahedi hereby appeal to the Supreme Court of Nevada from (1) the court's September
3 23, 2020 findings of fact, conclusions of law, and judgment regarding punitive damages, notice of
4 entry of which was filed September 24, 2020; (2) the September 23, 2020 final judgment, notice of
5 entry of which was filed September 24, 2020; (3) the December 4, 2020, order denying
6 plaintiffs/counter-defendants' motion to alter or amend the court's findings and judgment and for a
7 new trial pursuant to NRCP 52(b) and NRCP 59(a), notice of entry of which was filed December 8,
8 2020; and all interlocutory orders made appealable by their entry.
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11 Dated this 26th day of December 2020.

12 THE POWELL LAW FIRM

13 /s/ Tom W. Stewart

14 Tom W. Stewart, Esq.

15 Nevada Bar No. 14280

16 8918 Spanish Ridge Ave. Ste. 100

17 Las Vegas, NV 89148

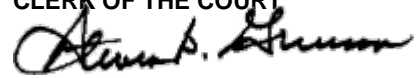
18 Attorneys for Plaintiffs

19 **CERTIFICATE OF SERVICE**

20 Pursuant to Nevada Rule of Civil Procedure 5(b), I hereby certify that on the 26th day of
21 December 2020, **PLAINTIFFS'/COUNTER-DEFENDANTS' NOTICE OF APPEAL** was
22 served via electronic service to all counsel of record currently signed up for electronic service.
23

24 /s/ Tom W. Stewart

25 An Employee of THE POWELL LAW FIRM
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Attorneys for plaintiffs/counter-defendants

DISTRICT COURT

CLARK COUNTY, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC, a
Nevada limited-liability company,

Plaintiffs,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual; ALI
MOJTAHED, an individual; DOES I through X,
and ROE CORPORATIONS I though X, inclusive,

Defendants.

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited-liability company; MOHAMMAD
MOJTAHED individually and derivatively on
behalf of MEDITEX, LLC, a Nevada limited-
liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI, an
individual; UTSAFETY, LLC, a Utah limited-
liability company; DOES I through X, and ROE
CORPORATIONS I though X, inclusive,

Counter-Defendants.

Case No.: A-15-729030-B

Dept No.: 13

**PLAINTIFFS'/COUNTER-
DEFENDANTS' CASE APPEAL
STATEMENT**

- 1 1. Appellants Parviz Safari, Mandana Zahedi, and Nooshin Zahedi file this case appeal
2 statement.
- 3 2. Judge Mark Denton, Eighth Judicial District Court, Department 13 entered the orders
4 appeal from.
- 5 3. Appellants Parviz Safari, Mandana Zahedi, and Nooshin Zahedi file are represented
6 by Tom W. Stewart, Esq., of the Powell Law Firm, located at 8918 Spanish Ridge Avenue, #100,
7 Las Vegas, Nevada 89148.
- 8 4. Respondents Hamid Modjtahed and Mohammad Mojtahed are represented by
9 Jonathan D. Blum, Esq., of Wiley Petersen, located at 1050 Indigo Drive, #200B, Las Vegas,
10 Nevada 89145.
- 11 5. All attorneys listed above are licensed to practice law in Nevada.
- 12 6. Appellants were represented by retained counsel in the district court.
- 13 7. Appellants are represented by retained counsel on appeal.
- 14 8. Appellant was not granted leave to proceed in forma pauperis in the district court.
- 15 9. The proceedings commenced on December 15, 2015.
- 16 10. The underlying action is a dispute between former business partners involving the
17 purchase of various goods and the transfers of funds for those goods. Respondents prevailed on
18 their claims and were eventually awarded punitive damages. Appellants appeal from (1) the court's
19 September 23, 2020 findings of fact, conclusions of law, and judgment regarding punitive damages,
20 notice of entry of which was filed September 24, 2020; (2) the September 23, 2020 final judgment,
21 notice of entry of which was filed September 24, 2020; (3) the December 4, 2020, order denying
22 plaintiffs/counter-defendants' motion to alter or amend the court's findings and judgment and for a
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1 new trial pursuant to NRCP 52(b) and NRCP 59(a), notice of entry of which was filed December 8,
2 2020; and all interlocutory orders made appealable by their entry.

3 11. This case has previously been the subject of an appeal in the Supreme Court under
4 Docket No. 79926.

5 12. This appeal does not involve child custody or visitation.

6 13. This case may involve the possibility of settlement.

7 Dated this 26th day of December 2020.

8 THE POWELL LAW FIRM

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10
11 /s/ Tom W. Stewart
12 Tom W. Stewart, Esq.
13 Nevada Bar No. 14280
14 8918 Spanish Ridge Ave. Ste. 100
15 Las Vegas, NV 89148
16 Attorneys for Plaintiffs

17 **CERTIFICATE OF SERVICE**

18 Pursuant to Nevada Rule of Civil Procedure 5(b), I hereby certify that on the 26th day of
19 December 2020, **PLAINTIFFS'/COUNTER-DEFENDANTS' CASE APPEAL STATEMENT**
20 was served via electronic service to all counsel of record currently signed up for electronic service.

21 /s/ Tom W. Stewart
22 An Employee of THE POWELL LAW FIRM
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DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

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§

Location: **Department 13**
Judicial Officer: **Denton, Mark R.**
Filed on: **12/15/2015**
Case Number History: **A-15-729030-C**
Cross-Reference Case Number: **A729030**
Supreme Court No.: **79926**

CASE INFORMATION

Statistical Closures

09/23/2020 Judgment Reached (bench trial)

Case Type: **Other Business Court Matters**

Case Flags: **Appealed to Supreme Court
Business Court
Filing Fee Balance Due
5/11/17- As to Counter
Defendants, Nooshin Zahedi &
UTSafety, LLC #24**

DATE

CASE ASSIGNMENT

Current Case Assignment








Case Number	A-15-729030-B
Court	Department 13
Date Assigned	04/05/2016
Judicial Officer	Denton, Mark R.

PARTY INFORMATION

		<i>Lead Attorneys</i>
Plaintiff	Meditex, LLC	Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)
	Safari, Parviz	Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)
	Zahedi, Mandana	Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)
Defendant	Modjtahed, Hamid	Blum, Jonathan D. <i>Retained</i> 702-910-3329(W)
	Mojtahed, Ali Removed: 09/27/2019 Dismissed	Blum, Jonathan D. <i>Retained</i> 702-910-3329(W)
	Mojtahed, Mohammad Removed: 09/27/2019 Dismissed	Blum, Jonathan D. <i>Retained</i> 702-910-3329(W)
Counter Claimant	Modjtahed, Hamid	Blum, Jonathan D. <i>Retained</i> 702-910-3329(W)
	Mojtahed, Ali	Blum, Jonathan D. <i>Retained</i> 702-910-3329(W)
	Mojtahed, Mohammad	Blum, Jonathan D.

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B













Counter Defendant	Safari, Parviz	<i>Retained</i> 702-910-3329(W)
		Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)
	Utsafety LLC	Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)
	Zahedi, Mandana	Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)
	Zahedi, Nooshin	Flahive, Andrew Scott, ESQ <i>Retained</i> 702-834-8664(W)

DATE	EVENTS & ORDERS OF THE COURT	INDEX
12/15/2015	 Complaint Filed By: Plaintiff Meditex, LLC <i>Complaint</i>	
12/16/2015	 Initial Appearance Fee Disclosure Filed By: Plaintiff Meditex, LLC <i>Initial Appearance Fee Disclosure</i>	
03/10/2016	 Acceptance of Service Filed By: Plaintiff Meditex, LLC <i>Acceptance of Service of Civil Summons and Complaint by Mohammad Mohajtahed</i>	
04/05/2016	 Motion to Dismiss Filed By: Counter Claimant Modjtahed, Hamid <i>Motion to Dismiss Plaintiff's Complaint - Request for Business Court Pursuant to EDCR 1.61 (a)(1) and (a)(2)(ii)</i>	
04/05/2016	 Initial Appearance Fee Disclosure Filed By: Counter Claimant Modjtahed, Hamid <i>Initial Appearance Fee Disclosure</i>	
04/19/2016	 Opposition and Countermotion Filed By: Plaintiff Meditex, LLC <i>Limited Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint and Countermotion for Leave to Amend Complaint</i>	
05/02/2016	 Reply to Opposition Filed by: Counter Claimant Modjtahed, Hamid <i>Defendants' Reply to Plaintiff's Limited Opposition to Motion to Dismiss Plaintiff's Complaint</i>	
05/09/2016	Motion to Dismiss (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants' Motion to Dismiss Plaintiff's Complaint - Request for Business Court Pursuant to EDCR 1.61(a)(1) and (a)(2)(ii)</i> Granted; <i>Granted</i>	
05/09/2016	Opposition and Countermotion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Plaintiff, Meditex, LLC's Limited Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint and Countermotion for Leave to Amend Complaint</i>	

DISTRICT COURT
CASE SUMMARY
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	Granted; <i>Granted</i>
05/09/2016	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
05/26/2016	 First Amended Complaint Filed By: Counter Defendant Safari, Parviz <i>First Amended Complaint</i>
05/27/2016	 Initial Appearance Fee Disclosure Filed By: Counter Defendant Safari, Parviz <i>Initial Appearance Fee Disclosure</i>
06/07/2016	 Order Filed By: Plaintiff Meditex, LLC <i>Order</i>
06/07/2016	Order of Dismissal (Judicial Officer: Denton, Mark R.) Debtors: Hamid Modjtahed (Defendant), Mohammad Modjtahed (Defendant), Ali Modjtahed (Defendant) Creditors: Meditex, LLC (Plaintiff) Judgment: 06/07/2016, Docketed: 06/14/2016 Comment: Certain Claims
06/09/2016	 Notice of Entry of Order Filed By: Plaintiff Meditex, LLC <i>Notice of Entry of Order</i>
06/13/2016	 Answer and Crossclaim Filed By: Counter Claimant Modjtahed, Hamid <i>Answer to First Amended Complaint and Counterclaim</i>
06/27/2016	 Affidavit of Service Filed By: Counter Claimant Modjtahed, Hamid <i>Affidavit of Service of Summons and Counterclaim upon Counter-Defendant Nooshin Zahedi</i>
06/27/2016	 Business Court Order <i>Business Court Order</i>
07/05/2016	 Answer to Counterclaim Filed By: Counter Defendant Safari, Parviz <i>Answer to Counterclaim</i>
07/11/2016	 Mandatory Rule 16 Conference (2:15 PM) (Judicial Officer: Denton, Mark R.) MINUTES Matter Heard; <i>Matter Heard</i> SCHEDULED HEARINGS CANCELED Status Check (08/04/2016 at 9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i> <i>Status Check Re: JCCR Filing</i>

DISTRICT COURT
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07/15/2016	 Affidavit of Service Filed By: Counter Claimant Modjtahed, Hamid <i>Affidavit of Service of Summons and Counterclaim upon Counter-Defendant Utsafety, LLC</i>
07/20/2016	 Order Setting Civil Bench Trial <i>Order Re Rule 16 Conference, Setting Civil Non Jury Trial, Calendar Call, and Deadlines for Motions; Discovery Scheduling Order</i>
07/26/2016	 Joint Case Conference Report Filed By: Counter Defendant Safari, Parviz <i>Joint Case Conference Report</i>
08/04/2016	CANCELED Status Check (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i> <i>Status Check Re: JCCR Filing</i>
09/02/2016	 Motion for Withdrawal Filed By: Plaintiff Meditex, LLC <i>Shumway Van's Motion to Withdraw as Attorney of Record for: Meditex, LLC; Parviz Safari; Mandana Zahedi; Nooshin Zahedi; and, UTSafety, LLC</i>
09/06/2016	 Certificate of Service Filed by: Counter Defendant Safari, Parviz <i>Certificate of Service for Shumway Van's Motion to Withdraw as Attorney of Record for: Meditex, LLC; Parviz Safari; Mandana Zahedi; Nooshin Zahedi; and Utsafety, LLC</i>
09/15/2016	 Stipulated Protective Order Filed By: Counter Claimant Modjtahed, Hamid <i>Stipulated Protective Order</i>
09/15/2016	 Opposition to Motion Filed By: Counter Claimant Modjtahed, Hamid <i>Limited Opposition to Shumway Van's Motion to Withdraw as Attorney of Record for: Meditex, LLC; Parviz Safari; Mandana Zahedi; Nooshin Zahedi; and, UTSafety, LLC</i>
09/19/2016	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Stipulated Protective Order</i>
09/30/2016	 Substitution of Attorney Filed by: Counter Defendant Safari, Parviz <i>Substitution of Counsel</i>
10/03/2016	 Motion to Withdraw as Counsel (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Shumway Van's Motion to Withdraw as Attorney of Record for: Meditex, LLC; Parviz Safari; Mandana Zahedi; Nooshin Zahedi; and, UTSafety, LLC</i> Moot; <i>Moot</i>
01/26/2017	 Stipulation and Order Filed by: Counter Claimant Modjtahed, Hamid <i>Stipulation and Order Regarding Use of Personally Identifiable Information</i>
03/20/2017	 Stipulation and Order Filed by: Counter Claimant Modjtahed, Hamid

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

Stipulation and Order to Extend Discovery Deadlines (First Request)

03/23/2017



Notice of Entry of Stipulation and Order

Filed By: Counter Claimant Modjtahed, Hamid

Notice of Entry of Stipulation and Order to Extend Discovery Deadlines (First Request)

04/27/2017



Motion to Quash

Filed By: Counter Claimant Mojtabeh, Mohammad

Defendants/Counter-Claimants Motion to Quash Subpoena and Motion for Protective Order

04/27/2017



Motion to Seal/Redact Records

Filed By: Plaintiff Meditex, LLC; Counter Claimant Mojtabeh, Mohammad; Counter Claimant Mojtabeh, Ali

Defendants/Counter-Claimants' Motion to Seal Exhibit J to Quash Subpoena and Motion for Protective Order

05/02/2017



Filed Under Seal

Filed By: Counter Claimant Modjtahed, Hamid

Exhibit J to Defendant/Counterclaimants Motion to Quash Subpoena and Motion for Protective Order

05/04/2017



Motion for Protective Order

Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin; Counter Defendant Utsafety LLC

Plaintiffs' / Counter-Defendants' Motion for Protective Order on Order Shortening Time

05/09/2017



Ex Parte Motion

Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin; Counter Defendant Utsafety LLC

Ex Parte Motion for Order Shortening Time on Plaintiffs'/Counter-Defendants' Motion for Protective Order

05/15/2017



Order Shortening Time

Order Shortening Time on Ex Parte Motion for Order Shortening Time on Plaintiffs'/Counter-Defendants' Motion for Protective Order

05/15/2017



Opposition to Motion

Filed By: Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin; Counter Defendant Utsafety LLC

Plaintiffs' Opposition to Defendants/Counter-Claimants' Motion to Quash Subpoena and Motion for Protective Order; Motion to Seal Exhibit "J"

05/25/2017



Motion for Protective Order (9:00 AM) (Judicial Officer: Denton, Mark R.)

05/25/2017, 06/05/2017

Plaintiffs' / Counter-Defendants' Motion for Protective Order on Order Shortening Time

Continued;

Denied;

Continued;

Denied;

Continued

05/25/2017



Opposition to Motion For Protective Order

Filed By: Counter Claimant Modjtahed, Hamid

Defendants/Counter-Claimants Opposition to Plaintiffs' /Counter-Defendants Motion for Protective Order and Countermotion to Hold the Witness in Contempt, and for Sanctions

DISTRICT COURT
CASE SUMMARY
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05/30/2017	 Motion to Quash (9:00 AM) (Judicial Officer: Denton, Mark R.) 05/30/2017, 08/24/2017 <i>Defendants/Counter-Claimants Motion to Quash Subpoena and Motion for Protective Order</i> Continued; Denied; Continued; Denied; <i>Continued</i>
05/30/2017	Motion to Seal/Redact Records (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants/Counter-Claimants' Motion to Seal Exhibit J to Quash Subpoena and Motion for Protective Order</i> Continued; See 07/06/17 Minute Order <i>Continued</i>
05/30/2017	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
05/31/2017	 Stipulation and Order <i>Stipulation and Order to Reschedule May 25, 2017 and May 30, 2017 motion Hearings</i>
06/02/2017	 Reply to Opposition Filed by: Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin; Counter Defendant Utsafety LLC <i>Plaintiffs'/Counter-Defendants' Reply to Opposition and CounterMotion in Response to Plaintiffs'/Counter-Defendants' Motion for Protective Order</i>
06/14/2017	 Order Denying Motion Filed By: Counter Claimant Modjtahed, Hamid <i>Order Denying Plaintiffs / Counter-Defendants Motion for Protective Order and Granting Defendants / Counter-Claimants Countermotion to Hold the Witness in Contempt, And for Sanctions</i>
06/15/2017	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Order Denying Plaintiffs / Counter-Defendants Motion for Protective Order and Granting Defendants / Counter-Claimants Countermotion to Hold The Witness in Contempt, and for Sanctions</i>
06/26/2017	 Stipulation and Order Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad; Counter Claimant Mojtaheh, Ali <i>Stipulation and Order to Continue Hearing on Defendants/Counter-Claimants' Motion to Quash Subpoena and Motion for Protective Order</i>
06/27/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Meditex, LLC; Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad; Counter Claimant Mojtaheh, Ali <i>Notice of Entry of Stipulation and Order to Continue Hearing on Defendants/Counter-Claimants' Motion to Quash Subpoena and Motion for Protective Order</i>
07/06/2017	 Minute Order (2:39 PM) (Judicial Officer: Denton, Mark R.) Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>

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08/17/2017	 Reply to Opposition Filed by: Counter Claimant Modjtahed, Hamid <i>Defendants/Counter-Claimants' Reply to Plaintiffs' Opposition to Motion to Quash Subpoena and Motion for Protective Order</i>
09/05/2017	 Stipulation and Order Filed by: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Stipulation and Order to Extend Discovery Deadlines by 60 Days (Second Request)</i>
09/06/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Notice of Entry of Stipulation and Order to Extend Discovery Deadlines (Second Request)</i>
09/11/2017	 Order Setting Civil Jury Trial, Pre-Trial, and Calendar Call <i>Order Setting Civil Non-Jury Trial and Calendar Call</i>
09/13/2017	 Order Granting Filed By: Counter Claimant Modjtahed, Hamid <i>Order Granting Defendants/Counter-Claimants' Motion to Seal Exhibit J to Quash Subpoena & Motion for Protective Order</i>
09/14/2017	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Order Granting Defendants/Counter-Claimants' Motion to Seal Exhibit J to Quash Subpoena and Motion for Protective Order</i>
10/17/2017	 Acceptance of Service <i>Acceptance of Second Amended Deposition Subpoena to the Person Most Knowledgeable for Ovist & Howard, CPA's</i>
11/07/2017	 Order Denying Motion Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Order Granting in Part and Denying In Part Defendants' / Counter-Claimants' Motion to Quash Subpoena and Motion for Protective Order</i>
11/07/2017	 Notice of Entry of Order Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Notice of Entry of Order Granting In Part and Denying In Part Defendants / Counter-Claimants Motion to Quash Subpoena and Motion for Protective Order</i>
11/20/2017	CANCELED Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
11/27/2017	 Motion to Extend Discovery Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Motion to Extend Discovery And To Continue Trial</i>
11/28/2017	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
12/05/2017	 Stipulation and Order

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

	Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad; Counter Claimant Mojtaheh, Ali; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Stipulation and Order to Extend Discovery Deadlines to Complete Depositions (Third Request)</i>
12/05/2017	 Notice of Entry of Stipulation and Order Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Notice of Entry of Stipulation and Order to Extend Discovery deadlines (Third Request)</i>
12/08/2017	 Order Setting Civil Non-Jury Trial and Calendar Call <i>Order Setting Civil Non-Jury Trial and Calendar Call</i>
12/14/2017	 Opposition to Motion Filed By: Counter Claimant Modjtahed, Hamid <i>Opposition to Plaintiffs/Counter-Defendants' Motion to Extend Discovery and to Continue Trial</i>
01/04/2018	 Motion to Extend Discovery (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Motion to Extend Discovery and to Continue Trial</i> Denied; <i>Denied</i>
01/19/2018	 Order Denying <i>Order Denying Plaintiffs/Counter-Defendants' Motion to Extend Discovery and to Continue Trial</i>
01/23/2018	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Order Denying Plaintiffs/Counter-Defendants' Motion to Extend Discovery and to Continue Trial</i>
02/09/2018	 Motion for Summary Judgment Filed By: Counter Claimant Mojtaheh, Ali <i>Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtaheh</i>
02/09/2018	 Motion for Summary Judgment Filed By: Counter Claimant Modjtahed, Hamid <i>Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Mojtaheh</i>
02/09/2018	 Motion for Summary Judgment Filed By: Counter Claimant Modjtahed, Hamid <i>Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari</i>
02/12/2018	 Appendix Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad; Counter Claimant Mojtaheh, Ali <i>Appendix to Motion for Partial Summary Judgment on Counter-Claimants' Claims against Parviz Safari</i>
02/20/2018	CANCELED Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

02/27/2018	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
03/02/2018	 Opposition to Motion For Summary Judgment Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Opposition to Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Modjtahed</i>
03/02/2018	 Opposition to Motion For Summary Judgment Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin <i>Opposition to Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Modjtahed</i>
03/06/2018	 Non Opposition Filed By: Counter Claimant Modjtahed, Hamid <i>Notice Of Non-Opposition To Motion For Partial Summary Judgment On Counter-Claimants Claims Against Parviz Safari</i>
03/13/2018	 Motion to Continue Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin <i>Plaintiffs'/Counter-Defendants' Motion for Continuance and/or For Extension of Time to Respond to Defendant/s/Counter-Claimants' Motion for partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari on Order Shortening Time</i>
03/14/2018	 Opposition to Motion For Summary Judgment Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin <i>Opposition to Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari</i>
03/14/2018	 Certificate of Mailing Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin <i>Certificate of Service on Plaintiffs'/Counter-Defendants' Motion for Continuance and/or For Extension of Time to Respond to Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari on Order Shortening Time</i>
03/16/2018	 Motion in Limine Filed By: Counter Claimant Modjtahed, Hamid <i>Counter-Claimants' Motion in Limine to Exclude References to Illegal Sales to Iran (MIL #1)</i>
03/19/2018	 Status Report Filed By: Counter Claimant Modjtahed, Hamid <i>Stipulation and Order to Continue Hearing on Defendants/Counter-Claimants' Three Motions for Partial Summary Judgment and to Vacate the Related March 20, 2018 OST Hearing</i>
03/20/2018	CANCELED Motion to Continue (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i> <i>Plaintiffs'/Counter-Defendants' Motion for Continuance and/or For Extension of Time to Respond to Defendant/s/Counter-Claimants' Motion for partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari on Order Shortening Time</i>
03/21/2018	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

Notice of Entry Of Stipulation and Order to Continue Hearing on Defendants/Counterclaimants' Three Motions for Partial Summary Judgment and to Vacate the Related March 20, 2018 OST Hearing

03/22/2018



Reply to Opposition

Filed by: Counter Claimant Modjtahed, Hamid
Reply in Support of Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parvis Safari

03/22/2018



Reply to Opposition

Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtabeh, Mohammad
Reply in Support of Defendants-Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Mojtabeh and Mohammad Mojtabeh

03/22/2018



Reply to Opposition

Filed by: Counter Claimant Mojtabeh, Ali
Reply in Support of Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtabeh

03/29/2018

Motion for Summary Judgment (9:00 AM) (Judicial Officer: Denton, Mark R.)
Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtabeh
Granted;
Granted

03/29/2018

Motion for Summary Judgment (9:00 AM) (Judicial Officer: Denton, Mark R.)
Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Mojtabeh
Denied in Part;
Denied in Part

03/29/2018

Motion for Partial Summary Judgment (9:00 AM) (Judicial Officer: Denton, Mark R.)
Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari
Denied in Part;
Denied in Part

03/29/2018



All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.)

Matter Heard;
Matter Heard

04/05/2018



Opposition to Motion in Limine

Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin
Opposition to Defendants/Counter-Claimants' Motion In Limine to Exclude References to Illegal Sales to Iran (MIL #1)

04/09/2018



Reply to Opposition

Filed by: Counter Claimant Modjtahed, Hamid
Reply in Support of Counter-Claimants' Motion in Limine to Exclude References to Illegal Sales to Iran (MIL #1)

04/11/2018



Decision and Order

Decision and Order

04/11/2018



Stipulation and Order

Filed by: Counter Claimant Modjtahed, Hamid

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

Stipulation and Order to Continue Trial to Allow Substitution of Plaintiffs/Counter-Defendants' Counsel

04/11/2018



Notice of Entry of Default Judgment

Filed By: Counter Claimant Modjtahed, Hamid

Notice of Entry of Stipulation And Order To Continue Trial To Allow Substitution Of Plaintiffs/Counter-Defendants' Counsel

04/11/2018

Summary Judgment (Judicial Officer: Denton, Mark R.)

Debtors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtabeh (Counter Claimant), Ali Mojtabeh (Counter Claimant)

Creditors: Parviz Safari (Counter Defendant)

Judgment: 04/11/2018, Docketed: 04/18/2018

Comment: In Part

04/16/2018



Motion in Limine (9:00 AM) (Judicial Officer: Denton, Mark R.)

04/16/2018, 04/23/2018

Counter-Claimants' Motion in Limine to Exclude References to Illegal Sales to Iran (MIL #1)

Continued;

Granted;

Continued;

Granted;

Continued

04/23/2018



Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.)

Trial Date Set;

Trial Date Set

04/24/2018

Partial Summary Judgment (Judicial Officer: Denton, Mark R.)

Debtors: Meditex, LLC (Plaintiff), Parviz Safari (Plaintiff), Mandana Zahedi (Plaintiff), Nooshin Zahedi (Counter Defendant)

Creditors: Ali Mojtabeh (Defendant)

Judgment: 04/24/2018, Docketed: 04/24/2018

04/24/2018



Order Granting Summary Judgment

Filed By: Counter Claimant Modjtahed, Ali

Findings of Fact, Conclusions of Law, and Order Granting Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtabeh

04/24/2018

Partial Summary Judgment (Judicial Officer: Denton, Mark R.)

Debtors: Meditex, LLC (Plaintiff), Parviz Safari (Plaintiff), Mandana Zahedi (Plaintiff)

Creditors: Hamid Modjtahed (Defendant), Mohammad Mojtabeh (Defendant)

Judgment: 04/24/2018, Docketed: 04/24/2018

04/24/2018



Order Granting Summary Judgment

Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Modjtahed, Mohammad

Findings of Fact, Conclusions of Law, and Order Granting in Part and Denying in Part Defendants-Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Mojtabeh

04/27/2018



Notice of Entry of Order

Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Modjtahed, Mohammad

Notice of Entry of Findings of Fact, Conclusions of Law, and Order Granting in Part and Denying in Part Defendants-Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Mojtabeh

04/27/2018



Notice of Entry of Order

Filed By: Counter Claimant Modjtahed, Ali

DISTRICT COURT
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Notice of Entry of Findings of Fact, Conclusions of Law, and Order Granting Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtahed

04/30/2018



Order Setting Civil Non-Jury Trial
Order Setting Civil Non Jury Trial and Calendar Call

05/01/2018

CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.)
Vacated

05/08/2018

Partial Summary Judgment (Judicial Officer: Denton, Mark R.)
Debtors: Parviz Safari (Counter Defendant)
Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtahed (Counter Claimant), Ali Mojtahed (Counter Claimant)
Judgment: 05/08/2018, Docketed: 05/09/2018
Comment: In Part

05/08/2018



Findings of Fact, Conclusions of Law and Order
Filed By: Counter Claimant Modjtahed, Hamid
Findings of Fact, Conclusions of Law, and Order Granting in Part and Denying in Part Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari

05/08/2018



Order Granting Motion
Filed By: Counter Claimant Modjtahed, Hamid
Order Granting Counter-Claimants' Motion in Limine to Exclude References to Illegal Sales to Iran (MIL#1)

05/09/2018



Notice of Entry of Findings of Fact, Conclusions of Law
Filed By: Counter Claimant Modjtahed, Hamid
Notice of Entry of Findings of Fact, Conclusions of Law and Judgment

05/09/2018



Notice of Entry of Order
Filed By: Counter Claimant Modjtahed, Hamid
Notice of Entry of Order Granting Counter-Claimants' Motion in Limine to Exclude References to Illegal Sales to Iran (MIL#1)

05/18/2018



Motion for Partial Summary Judgment
Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad; Counter Claimant Mojtahed, Ali
Motion for Partial Summary Judgment on Counter-Claimants' Non-Fraud Claims Against Parviz Safari

06/04/2018



Opposition
Filed By: Counter Defendant Safari, Parviz
Opposition to Defendant/Counter-Claimants Motion for Partiral Summary Judgment on Counter-Claimant's Non Fraud Claims Against Parviz Safari and Countermotion to Reopen Discovery

06/14/2018



Reply in Support
Filed By: Counter Claimant Modjtahed, Hamid
Reply in Support of Motion for Partial Summary Judgment on Counter-Claimants' Non-Fraud Claims Against Parviz Safari

06/15/2018



Certificate of Service
Filed by: Counter Claimant Modjtahed, Hamid
Certificate of Service of Reply In Support Of Motion For Partial Summary Judgment On

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B













Counter-Claimants' Non-Fraud Claims Against Parviz Safari

06/21/2018	Motion for Partial Summary Judgment (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Non-Fraud Claims Against Parviz Safari</i> Granted in Part; <i>Granted in Part</i>
06/21/2018	Opposition and Countermotion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Plaintiff, Parviz Safari's Opposition to Defendant/Counter Claimants Motion for Partial Summary Judgment on Counter Claimant's Non Fraud Claims Against Parviz Safari and Countermotion to Reopen Discovery</i> Denied; <i>Denied</i>
06/21/2018	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
07/18/2018	Partial Summary Judgment (Judicial Officer: Denton, Mark R.) Debtors: Parviz Safari (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant), Ali Mojtaheh (Counter Claimant) Judgment: 07/18/2018, Docketed: 07/18/2018 Total Judgment: 95,200.00
07/18/2018	 Findings of Fact, Conclusions of Law and Order Filed By: Counter Claimant Modjtahed, Hamid <i>Findings of Fact, Conclusions of Law, and Order Granting in Part and Denying Part Motion for Partial Summary Judgment on Counter-Claimants' Non-Fraud Claims Against Parviz Safari</i>
07/18/2018	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Findings of Fact, Conclusions of Law, and Order Granting in Part and Denying in Part Motion for Partial Summary Judgment on Counter-Claimants' Non-Fraud Claims Against Parviz Safari</i>
08/09/2018	 Stipulation and Order Filed by: Counter Claimant Modjtahed, Hamid <i>Stipulation and Order to Continue Trial to Allow the Parties to Participate in a Settlement Conference on September 17, 2018</i>
08/09/2018	 Notice of Entry of Stipulation and Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Stipulation and Order to Continue Trial to Allow the Parties to Participate in a Settlement Conference on September 17, 2018</i>
08/15/2018	 Order Setting Civil Non-Jury Trial <i>Order Setting Civil Non-Jury Trial and Calendar Call</i>
09/10/2018	CANCELED Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
09/12/2018	 Substitution of Attorney Filed by: Counter Defendant Safari, Parviz <i>Substitution of Attorney</i>

DISTRICT COURT
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09/17/2018	 Settlement Conference (10:00 AM) (Judicial Officer: Allf, Nancy) Not Settled; <i>Not Settled</i>
09/18/2018	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated - per Stipulation and Order</i>
10/15/2018	 Order <i>Order Rescheduling Calendar Call</i>
10/25/2018	 Mandatory Pretrial Disclosure Party: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheed, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheed's Pre-Trial Disclosures</i>
11/02/2018	 Mandatory Pretrial Disclosure Party: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheed, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheed's Amended Pre-Trial Disclosures</i>
11/12/2018	 Pre-Trial Disclosure Party: Plaintiff Meditex, LLC <i>Amended Plaintiff's Pre-Trial Disclosures</i>
11/13/2018	 Calendar Call (1:00 PM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
11/16/2018	 Order Setting Civil Non-Jury Trial and Calendar Call <i>Order Setting Civil Non-Jury Trial and Calendar Call</i>
11/27/2018	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>
02/01/2019	 Mandatory Pretrial Disclosure Party: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheed, Mohammad <i>Defendants/Counter-claimants' Hamid Modjtahed and Mohammad Mojtaheed's Second Amended Pre-trial Disclosures</i>
02/15/2019	 Objection Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheed, Mohammad <i>Defendants/Counterclaimants' Hamid Modjtahed and Mohammad Mojtaheed's Objections to Plaintiff/Counter-Defendants' Amended Pre-Trial Disclosures</i>
02/25/2019	 Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
03/01/2019	 Motion for Preferential Trial Setting Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheed, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheed's Motion for Preferential Trial Setting</i>
03/05/2019	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>

DISTRICT COURT
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03/08/2019	 Order Setting Civil Non-Jury Trial and Calendar Call <i>Order Setting Civil Non-Jury Trial and Calendar Call</i>
04/04/2019	 Motion for Preferential Trial Setting (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants/Counterclaimants' Hamid Modjtahed and Mohammad Mojtahed's Motion for Preferential Trial Setting</i> Granted; <i>Granted</i>
04/05/2019	 Mandatory Pretrial Disclosure Party: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtahed's Third Amended Pre-Trial Disclosures</i>
04/22/2019	 Order Filed By: Counter Claimant Modjtahed, Hamid <i>Order Regarding Defendants/Counterclaimants' Hamid Modjtahed and Mohammad Mojtahed's Motion for Preferential Trial Setting</i>
04/23/2019	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Order Regarding Defendants/ Counterclaimants' Hamid Modjtahed and Mohammad Mojtahed's Motion for Preferential Trial Setting</i>
04/29/2019	 Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) Trial Date Set; <i>Trial Date Set</i>
05/07/2019	CANCELED Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>
05/14/2019	 Trial Subpoena Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Civil Subpoena (For Personal Appearance at Trial)</i>
05/14/2019	 Trial Subpoena Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Civil Subpoena (For Personal Appearance at Trial)</i>
05/14/2019	 Trial Subpoena Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Civil Subpoena (For Personal Appearance at Trial)</i>
05/14/2019	 Acceptance of Service Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Acceptance of Service of Trial Subpoena to Eric Lorenz, CPA</i>
05/14/2019	 Acceptance of Service Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Acceptance of Service of Trial Subpoena to David Kellerman</i>
05/16/2019	 Acceptance of Service Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Acceptance of Service of Trial Subpoena to Kevin Kirkendall</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

05/17/2019



Pre-trial Memorandum

Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad
*Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtahed's Individual
Pre-Trial Memorandum Per EDCR 2.67*

05/21/2019



Bench Trial (9:00 AM) (Judicial Officer: Denton, Mark R.)

**05/21/2019-05/23/2019, 06/11/2019-06/14/2019, 06/19/2019, 06/21/2019, 06/25/2019-06/27/2019,
07/16/2019-07/18/2019, 07/31/2019-08/01/2019, 08/07/2019**

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DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

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DISTRICT COURT
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DISTRICT COURT
CASE SUMMARY
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	<p>Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues;</p> <p>Trial Continues; Trial Continues; Trial Continues; Court Finds for Defendant; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues; Trial Continues;</p> <p>Trial Continues; Trial Continues; Trial Continues; Court Finds for Defendant; <i>Trial Continues</i></p>
05/28/2019	 Status Check (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Status Check: Trial Setting</i> Trial Date Set; <i>Trial Date Set</i>
06/11/2019	CANCELED Jury Trial (1:30 PM) (Judicial Officer: Denton, Mark R.) <i>Vacated - Duplicate Entry</i>
06/14/2019	 Default Filed By: Counter Claimant Modjtahed, Hamid <i>Default Against Counter-Defendant, Nooshin Zahedi</i>
06/18/2019	 Motion Filed By: Counter Defendant Safari, Parviz <i>Motion to Allow Testimony of PMK Yusen Logistics (Canada), Inc. and/or Bill Carter</i>
06/18/2019	 Motion Filed By: Counter Defendant Safari, Parviz <i>Motion to Vacate Order Granting Counterclaimants' Motion in Limine to Exclude Reference to Illegal Sales to Iran or in the Alternative to be Allowed to Elicit Testimony Regarding Sanction Against Iran</i>
06/24/2019	 Opposition to Motion Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheed, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheed's Opposition to Motion to Allow Testimony of PMK Yusen Logistics (Canada), Inc. and/or Bill Carter</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

06/24/2019	 Opposition to Motion Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtahed's Opposition to Motion to Vacate Order Granting Counterclaimants' Motion in Limine to Exclude Reference to Illegal Sales to Iran or in the Alternative to Be Allowed to Elicit Testimony Regarding Sanction Against Iran</i>
06/24/2019	 Recorders Transcript of Hearing <i>Recorders Transcript of Hearing Re: Partial Transcript of Bench Trial, May 23, 2019 - Testimony of Aden Safari Devis Only</i>
06/25/2019	Motion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Motion to Allow Testimony of PMK Yusen Logistics (Canada), Inc. and/or Bill Carter</i> Granted; <i>Granted</i>
06/25/2019	Motion to Vacate (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Motion to Vacate Order Granting Counterclaimants' Motion in Limine to Exclude Reference to Illegal Sales to Iran or in the Alternative to be Allowed to Elicit Testimony Regarding Sanctions Against Iran</i> Denied; <i>Denied</i>
06/25/2019	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
07/09/2019	 Recorders Transcript of Hearing <i>Recorder's Transcript of Hearing Re: Bench Trial - Day 9, June 21, 2019</i>
07/11/2019	 Status Check (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Status Check: 30(b)(6) Witness</i> Matter Heard; <i>Matter Heard</i>
07/29/2019	 Recorders Transcript of Hearing <i>Recorder's Transcript of Hearing Re: Bench Trial - Day 10, June 25, 2019</i>
08/07/2019	 Brief Filed By: Counter Claimant Modjtahed, Hamid <i>Defendants' Trial Brief: Plaintiffs' Sole Remaining Claim of Accounting is Not Viable</i>
08/07/2019	 Brief Filed By: Counter Claimant Modjtahed, Hamid <i>Counter-Claimants' Trial Brief Regarding Counter-Claimants' Causes of Action and Damages</i>
09/27/2019	 Findings of Fact, Conclusions of Law and Judgment <i>Findings of Fact Conclusions of Law and Judgment</i>
09/27/2019	Judgment (Judicial Officer: Denton, Mark R.) Debtors: Meditex, LLC (Plaintiff), Parviz Safari (Plaintiff), Mandana Zahedi (Plaintiff) Creditors: Hamid Modjtahed (Defendant), Mohammad Mojtahed (Defendant), Ali Mojtahed (Defendant) Judgment: 09/27/2019, Docketed: 09/30/2019
09/27/2019	Order of Dismissal (Judicial Officer: Denton, Mark R.) Debtors: Meditex, LLC (Plaintiff), Parviz Safari (Plaintiff), Mandana Zahedi (Plaintiff)

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

	Creditors: Hamid Modjtahed (Defendant), Mohammad Mojtaheh (Defendant), Ali Mojtaheh (Defendant) Judgment: 09/27/2019, Docketed: 09/30/2019
09/27/2019	Judgment Plus Legal Interest (Judicial Officer: Denton, Mark R.) Debtors: Parviz Safari (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/27/2019, Docketed: 09/30/2019 Total Judgment: 405,475.00 Debtors: Mandana Zahedi (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/27/2019, Docketed: 09/30/2019 Total Judgment: 111,675.00 Debtors: Nooshin Zahedi (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/27/2019, Docketed: 09/30/2019 Total Judgment: 91,700.00
09/30/2019	 Notice of Entry Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Findings of Fact Conclusions of a Law and Judgment</i>
10/02/2019	 Memorandum of Costs and Disbursements Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Memorandum of Costs and Disbursements</i>
10/03/2019	 Notice of Entry of Stipulation and Order Filed By: Counter Claimant Modjtahed, Hamid <i>Notice of Entry of Stipulation and Order to Extend the Deadline to File a Verified Memorandum of Costs</i>
10/03/2019	 Stipulation and Order Filed by: Counter Claimant Modjtahed, Hamid <i>Stipulation and Order to Extend the Deadline to File a Verified Memorandum of Costs</i>
10/16/2019	 Motion for Attorney Fees Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Attorneys' Fees</i>
10/16/2019	 Appendix Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Appendix of Exhibits to Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Attorneys' Fees</i>
10/17/2019	 Motion Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Punitive Damages</i>
10/18/2019	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
10/23/2019	 Motion to Amend Filed By: Counter Defendant Safari, Parviz <i>Motion for Reconsideration or Amendment of Judgment</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

10/24/2019	 Notice of Appeal Filed By: Counter Defendant Safari, Parviz <i>Notice of Appeal</i>
11/01/2019	 Opposition to Motion Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Opposition to Parviz Safari, Mandana Zahedi and Meditex, LLC's Motion for Reconsideration or Amendment of Judgment</i>
11/05/2019	 Notice of Non Opposition Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Notice of Non-Opposition to Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Attorneys' Fees</i>
11/05/2019	 Notice of Non Opposition Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Notice of Non-Opposition to Defendants-Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Punitive Damages</i>
11/06/2019	 Opposition to Motion Filed By: Plaintiff Meditex, LLC; Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Opposition to Defendants/Counterclaimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Punitive Damages</i>
11/06/2019	 Opposition to Motion Filed By: Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana <i>Opposition to Motion for Attorneys' Fees</i>
11/15/2019	 Reply in Support Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Defendants/Counter-Claimants' Reply in Support of Hamid Modjtahed and Mohammad Mojtaheh's Motion for Attorneys' Fees</i>
11/15/2019	 Reply in Support Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Reply in Support of Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Punitive Damages</i>
11/17/2019	 Stipulation and Order Filed by: Counter Defendant Safari, Parviz <i>Stipulation and Order to Vacate Hearing and to Set Hearings</i>
11/18/2019	 Motion (9:00 AM) (Judicial Officer: Denton, Mark R.) 11/18/2019, 12/05/2019 <i>Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Punitive Damages</i> Matter Continued; Hearing Set; Matter Continued; Hearing Set; <i>Matter Continued</i>
12/05/2019	Motion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Plaintiffs' Motion for Reconsideration or Amendment of Judgment</i>












DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

	Denied; <i>Denied</i>
12/05/2019	Motion for Attorney Fees (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Defendants/Counterclaimants' Hamid Modjtahed and Mohammed Mojtaheh's Motion for Attorneys' Fees</i> Granted; <i>Granted</i>
12/05/2019	 All Pending Motions (9:00 AM) (Judicial Officer: Denton, Mark R.) Matter Heard; <i>Matter Heard</i>
12/23/2019	 Decision and Order <i>Decision</i>
12/27/2019	 Recorders Transcript of Hearing <i>Recorder's Transcript of Hearing Re: Partial Transcript of Testimony in Progress of Mandana Zahedi from 2:33 p.m. to 2:44 p.m. - June 19, 2019</i>
01/03/2020	 Motion for Clarification Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Motion for Clarification Regarding December 19, 2019 Decision With Regard to Costs (Hearing Not Requested)</i>
01/03/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
02/03/2020	 Motion for Clarification (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Motion for Clarification Regarding December 19, 2019 Decision With Regard to Costs</i> Granted; <i>Granted</i>
02/04/2020	 Order Setting Civil Bench Trial <i>Order Setting Civil Non-Jury Trial and Calendar Call</i>
02/25/2020	 Order Granting Motion Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Order Regarding Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Clarification Regarding December 19, 2019 Decision with Regard to Costs</i>
02/25/2020	Order (Judicial Officer: Denton, Mark R.) Debtors: Parviz Safari (Counter Defendant), Mandana Zahedi (Counter Defendant), Nooshin Zahedi (Counter Defendant), Utsafety LLC (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 02/25/2020, Docketed: 02/25/2020 Total Judgment: 104,200.51
02/26/2020	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Notice of Entry of Order Regarding Defendants/Counterclaimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Clarification Regarding December 19, 2019 Decision With Regard to Costs</i>
02/26/2020	 Order










DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

	Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Order Granting Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Attorneys' Fees</i>
02/26/2020	Order (Judicial Officer: Denton, Mark R.) Debtors: Parviz Safari (Plaintiff) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant), Ali Mojtaheh (Counter Claimant) Judgment: 02/26/2020, Docketed: 02/26/2020 Total Judgment: 382,344.50 Debtors: Mandana Zahedi (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant), Ali Mojtaheh (Counter Claimant) Judgment: 02/26/2020, Docketed: 02/26/2020 Total Judgment: 65,000.00 Debtors: Parviz Safari (Counter Defendant), Mandana Zahedi (Counter Defendant), Nooshin Zahedi (Counter Defendant), Utsafety LLC (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant), Ali Mojtaheh (Counter Claimant) Judgment: 02/26/2020, Docketed: 02/26/2020 Total Judgment: 104,200.51
02/26/2020	 Notice of Entry of Order Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Notice of Entry of Order Granting Defendants/Counter-Claimants' Hamid Modjtahed and Mohammad Mojtaheh's Motion for Attorneys' Fees</i>
03/02/2020	 Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) Trial Date Set; <i>Trial Date Set</i>
03/03/2020	 Notice of Change of Address Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad; Counter Claimant Mojtaheh, Ali <i>Notice of Change of Firm and Address</i>
03/10/2020	CANCELED Non-Jury Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>
03/19/2020	 Minute Order (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Re: Bench Trial</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
04/01/2020	CANCELED Non-Jury Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>
04/07/2020	 Order Setting Civil Non-Jury Trial <i>Order Setting Civil Non-Jury Trial</i>
06/24/2020	 Minute Order (2:00 PM) (Judicial Officer: Denton, Mark R.) <i>Re: BlueJeans Appearance</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
06/29/2020	 Calendar Call (2:00 PM) (Judicial Officer: Denton, Mark R.) Trial Date Set; <i>Trial Date Set</i>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

07/04/2020	 Motion to Withdraw As Counsel Filed By: Counter Defendant Safari, Parviz <i>Motion to Withdraw as Attorney of Record</i>
07/07/2020	CANCELED Non-Jury Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Vacated</i>
07/07/2020	 Clerk's Notice of Hearing <i>Notice of Hearing</i>
07/08/2020	 Minute Order (10:00 AM) (Judicial Officer: Denton, Mark R.) <i>Re: BlueJeans Trial Appearance</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
07/13/2020	 Pre-trial Memorandum Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Joint Pre-Trial Memorandum per EDCR 2.67 for Punitive Damages Hearing</i>
07/15/2020	 Non-Jury Trial (9:00 AM) (Judicial Officer: Denton, Mark R.) Court Finds for Defendant; Court Finds for Defendant/ Counterclaimant <i>Court Finds for Defendant</i>
07/15/2020	 Brief Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Counterclaimant's Trial Brief Regarding Punitive Damages</i>
08/03/2020	 Minute Order (1:30 PM) (Judicial Officer: Denton, Mark R.) <i>Re: Bench Trial Decision</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
08/04/2020	 Minute Order (1:00 PM) (Judicial Officer: Denton, Mark R.) <i>Re: BlueJeans Appearance</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
08/06/2020	 Motion to Withdraw as Counsel (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Plaintiff/Counter-Defendants' Motion to Withdraw as Attorney of Record</i> Granted; <i>Granted</i>
09/23/2020	 Findings of Fact, Conclusions of Law and Judgment <i>Findings of Fact, Conclusions of Law, and Judgment Regarding Punitive Damages</i>
09/23/2020	 Judgment <i>Final Judgment</i>
09/23/2020	Judgment Plus Legal Interest (Judicial Officer: Denton, Mark R.) Debtors: Parviz Safari (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/23/2020, Docketed: 09/23/2020 Total Judgment: 810,950.00 Debtors: Mandana Zahedi (Counter Defendant)

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

	<p>Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/23/2020, Docketed: 09/23/2020 Total Judgment: 223,350.00</p> <p>Debtors: Nooshin Zahedi (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/23/2020, Docketed: 09/23/2020 Total Judgment: 183,400.00</p>
09/23/2020	<p>Judgment Plus Legal Interest (Judicial Officer: Denton, Mark R.)</p> <p>Debtors: Parviz Safari (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/23/2020, Docketed: 09/23/2020 Total Judgment: 2,081,631.58</p> <p>Debtors: Mandana Zahedi (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/23/2020, Docketed: 09/23/2020 Total Judgment: 608,515.62</p> <p>Debtors: Nooshin Zahedi (Counter Defendant) Creditors: Hamid Modjtahed (Counter Claimant), Mohammad Mojtaheh (Counter Claimant) Judgment: 09/23/2020, Docketed: 09/23/2020 Total Judgment: 464,936.53 Comment: Final Judgment</p>
09/24/2020	<p> Notice of Entry</p> <p>Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Notice of Entry of Final Judgment</i></p>
09/24/2020	<p> Notice of Entry</p> <p>Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad <i>Notice of Entry of Findings of Fact, Conclusions of Law, and Judgment Regarding Punitive Damages</i></p>
10/12/2020	<p> Recorders Transcript of Hearing</p> <p><i>Recorder's Transcript of Hearing Re: Non-Jury Trial - July 15, 2020</i></p>
10/21/2020	<p> Notice of Appearance</p> <p>Party: Counter Defendant Safari, Parviz; Counter Defendant Zahedi, Mandana; Counter Defendant Zahedi, Nooshin <i>Notice of Appearance</i></p>
10/21/2020	<p> Motion for New Trial</p> <p>Filed By: Counter Defendant Safari, Parviz <i>Motion to Alter or Amend the Judgement and for New Trial</i></p>
10/22/2020	<p> Clerk's Notice of Nonconforming Document</p> <p><i>Clerk's Notice of Nonconforming Document</i></p>
10/22/2020	<p> Clerk's Notice of Nonconforming Document and Curative Action</p> <p><i>Clerk's Notice of Curative Action</i></p>
10/23/2020	<p> Clerk's Notice of Hearing</p> <p><i>Clerk's Notice of Hearing</i></p>
11/04/2020	<p> Stipulation and Order</p> <p>Filed by: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtaheh, Mohammad; Counter Claimant Mojtaheh, Ali <i>Stipulation and Order to Extend the Deadline for Defendants/Counter-Claimants to File</i></p>

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

	<i>Opposition to Plaintiffs'/Counter-Defendants' Motion to Alter or Amend the Judgment and for New Trial</i>
11/06/2020	 Opposition Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Opposition to Plaintiffs'/Counter-Defendants' Motion to Alter or Amend the Judgment and For New Trial</i>
11/13/2020	 Reply in Support Filed By: Counter Defendant Safari, Parviz <i>Plaintiffs'/Counter-Defendants' Reply in Support of Motion to Alter or Amend the Judgement and for New Trial</i>
11/19/2020	 Minute Order (1:00 PM) (Judicial Officer: Denton, Mark R.) <i>Re: BlueJeans Appearance</i> Minute Order - No Hearing Held; <i>Minute Order - No Hearing Held</i>
11/23/2020	 Motion (9:00 AM) (Judicial Officer: Denton, Mark R.) <i>Motion to Alter or Amend the Judgement and for New Trial</i> Denied; <i>Denied</i>
12/04/2020	 Order Denying Motion Filed By: Counter Claimant Modjtahed, Hamid <i>Order Denying Plaintiffs'/Counter-Defendant's Motion to Alter or Amend the Judgment and for New Trial</i>
12/08/2020	 Notice of Entry Filed By: Counter Claimant Modjtahed, Hamid; Counter Claimant Mojtahed, Mohammad <i>Notice of Entry of Order Denying Plaintiffs'/Counterdefendants' Motion to Alter or Amend the Judgment and for New Trial</i>
12/26/2020	 Notice of Appeal Filed By: Counter Defendant Safari, Parviz <i>Notice of Appeal</i>
12/26/2020	 Case Appeal Statement Filed By: Counter Defendant Safari, Parviz <i>Case Appeal Statement</i>

DATE	FINANCIAL INFORMATION
	Counter Claimant Modjtahed, Hamid Total Charges 2,083.00 Total Payments and Credits 2,083.00 Balance Due as of 12/28/2020 0.00
	Counter Claimant Mojtahed, Ali Total Charges 230.00 Total Payments and Credits 230.00 Balance Due as of 12/28/2020 0.00
	Counter Claimant Mojtahed, Mohammad Total Charges 30.00 Total Payments and Credits 30.00 Balance Due as of 12/28/2020 0.00
	Counter Defendant Utsafety LLC

DISTRICT COURT
CASE SUMMARY
CASE NO. A-15-729030-B

Total Charges	1,483.00
Total Payments and Credits	0.00
Balance Due as of 12/28/2020	1,483.00
 Counter Defendant Zahedi, Nooshin	
Total Charges	1,483.00
Total Payments and Credits	0.00
Balance Due as of 12/28/2020	1,483.00
 Plaintiff Meditex, LLC	
Total Charges	308.00
Total Payments and Credits	308.00
Balance Due as of 12/28/2020	0.00
 Counter Defendant Safari, Parviz	
Total Charges	78.00
Total Payments and Credits	78.00
Balance Due as of 12/28/2020	0.00
 Counter Defendant Zahedi, Mandana	
Total Charges	30.00
Total Payments and Credits	30.00
Balance Due as of 12/28/2020	0.00

DISTRICT COURT CIVIL COVER SHEET

Clark County, Nevada
 Case No. A-15-729030-C Dept VIII
(Assigned by Clerk's Office)

I. Party Information *(provide both home and mailing addresses if different)*

Plaintiff(s) (name/address/phone): <u>Meditex LLC</u> <u>2831 St. Rose Pkwy, Ste. 237</u> <u>Henderson, NV 89052</u>	Defendant(s) (name/address/phone): <u>Hamid Modjtahed</u> <u>Mohammad Modjtahed</u> <u>Ali Modjtahed</u>
Attorney (name/address/phone): <u>Michael Van</u> <u>Shumway Van</u> <u>8985 S Eastern Ave, Ste 100</u> <u>Las Vegas, NV 89123</u>	Attorney (name/address/phone):

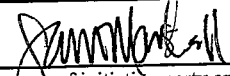
II. Nature of Controversy *(please select the one most applicable filing type below)*

Civil Case Filing Types

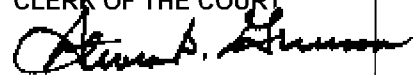
Real Property Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Torts Other Torts <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate <i>(select case type and estate value)</i> <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect & Contract Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review/Appeal Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ		Other Civil Filing Other Civil Filing <input type="checkbox"/> Compromise of Minor's Claim <input type="checkbox"/> Foreign Judgment <input checked="" type="checkbox"/> Other Civil Matters

Business Court filings should be filed using the Business Court civil coversheet.

12/15/15
 Date


 Signature of initiating party or representative

See other side for family-related case filings.



1 **FFCL**

JONATHAN D. BLUM, ESQ.

2 Nevada Bar No. 09515

WILEY PETERSEN

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5 E-Mail: jblum@wileypetersenlaw.com

6 *Attorneys for Defendants/Counter-Claimants*

7 **DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9
10 **PARVIZ SAFARI and MANDANA ZAHEDI,**
11 **individually and on behalf of MEDITEX, LLC,**
12 **a Nevada limited liability company,**
13 **Plaintiff,**

14 **vs.**

15 **HAMID MODJTAHED, an individual;**
16 **MOHAMMAD MOJTAHED, an individual;**
17 **ALI MOJTAHED, an individual; DOES I**
18 **through X; and ROE CORPORATIONS I**
19 **through X, inclusive,**

20 **Defendants.**

21 **HAMID MODJTAHED, individually and**
22 **derivatively on behalf of MEDITEX, LLC, a**
23 **Nevada limited liability company;**
24 **MOHAMMAD MOJTAHED, individually and**
25 **derivatively on behalf of MEDITEX, LLC, a**
26 **Nevada limited liability company,**

27 **Counter-Claimants,**

28 **vs.**

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
JUDGMENT REGARDING
PUNITIVE DAMAGES**

1 **FINDINGS OF FACT, CONCLUSIONS OF LAW, AND JUDGMENT**

2 This matter came before this Court for Trial on multiple dates, beginning on May 21,
3 2019 through August 7, 2019. The Court entered Findings of Fact, Conclusions of Law and
4 Judgment on September 27, 2019 (the “2019 Judgment”), which stated, in part, “A subsequent
5 proceeding, pursuant to NRS 42.005(3), shall be conducted to determine the amount of punitive
6 damages to be assessed.” The second phase of trial regarding punitive/ exemplary damages was
7 conducted on July 15, 2020.

8 Andrew Scott Flahive, Esq. of Flahive & Associates, Ltd. appeared on behalf of the
9 Plaintiffs/Counter-Defendants, and Jonathan D. Blum, Esq. of Wiley Petersen appeared on
10 behalf of the Defendants/Counter-Claimants. The Court, having considered the papers and
11 pleadings on file, the oral and written arguments of counsel, witness testimony and other
12 evidence at the punitive damages phase of trial, entered a Minute Order on August 3, 2020. The
13 Court hereby makes its Findings of Fact and Conclusions of Law and enters Judgment as
14 follows:

15 **Findings of Fact**

16 1. The Court refers to and incorporates all Findings of Fact set forth in the 2019
17 Judgment to the extent such findings relate to the issue of punitive damages.

18 2. Hamid Modjtahed ("Hamid") and Mohammad Mojtaheh ("Mohammad") are
19 referred to as "Defendants" or "Counterclaimants".

20 3. Parviz Safari aka Aidan Davis ("Mr. Safari") and Mandana Zahedi ("Mandana")
21 are referred to as “Plaintiffs” or “Counter-defendants”.

22 4. Nooshin Zahedi ("Nooshin") is referred to as a "Counter-defendant".

23 **Factors Relevant to the Assessment of Punitive Damages**

24 **The Financial Position of the Counter-Defendants**

25 5. In 2016 Mr. Safari and Mandana formed a company called Aimans Enterprises,
26 LLC ("Aimans"). *Exhibit 4: PUNI000296 – PUNI000299; Exhibit 47: PUNI000292-*
27 *PUNI000293.*

28 6. Mr. Safari and Mandana are the sole members and managers of Aimans. *Id.*

1 7. In November, 2016, Mr. Safari and Mandana opened a bank account for Aimans
2 and are listed as its sole owners.

3 8. From late 2016 through late 2019, Mr. Safari and Mandana received significant
4 funds, on a regular basis, into the business account for Aimans. Such funds range from
5 approximately \$65,000 per year, to more than \$130,000 per year. *See Exhibit 12: PUNI01690,*
6 *Exhibit 11: PUNI01682, Exhibit 10: PUNI01672, Exhibit 9: PUNI01664, Exhibit 8: PUNI01656,*
7 *Exhibit 7: PUNI01646, Exhibit 6: PUNI01630, Exhibit 5: PUNI01614; Exhibit 73: PUNI00356,*
8 *Exhibit 73: PUNI00341; Exhibit 73: PUNI00335, Exhibit 24: PUNI01892, Exhibit 23:*
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16 9. Mr. Safari and Mandana also received significant amounts of money into various
17 other personal bank accounts including at Wells Fargo, US Bank, Bank of America and Chase.
18 Such funds, together, total more than \$500,000 from late 2016 through late 2019. *See Exhibit*
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3 10. Mr. Safari is a trained petroleum engineer.

4 11. Mandana Zahedi is a trained medical doctor.

5 **Culpability and Blameworthiness of the Tortfeasor**

6 12. The Court refers to and incorporates various factual findings set forth in the 2019
7 Judgment that address the culpability and blameworthiness of the Tortfeasor. *See* 2019
8 Judgment, p. 8, ¶42 – p.24, ¶157.

9 13. Such findings include those related to numerous willful fraudulent schemes
10 involving complex planning, coordination and execution, the creation of fraudulent documents
11 and the creation of a shell company used to fool Hamid and Mohammad. *Id.*

12 14. Counter-defendants engaged in purposeful deceit over many years, resulting in
13 improper acquisition of money from Hamid and Mohammad. *Id.*

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15 most of which were disposed of by summary judgment, and the rest failed at trial. *Id.* at p. 2, ¶1
16 – p. 6, ¶23; p. 26, ¶1 – p. 28, ¶12.

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18 16. Hamid was born in 1947, and was over 60 in 2010 when the Company was
19 formed and the frauds began.

20 17. Hamid is an elderly man aged 74.

21 18. The financial toll on Hamid related to the financial losses to him related to
22 investments he made into Meditex were significant, including a significant portion of his
23 savings.

24 19. The financial toll on Hamid related to the costs of this litigation have been
25 significant, including a significant portion of his savings.

26 20. The financial toll on Mohammad related to the financial losses to him related to
27 investments he made into Meditex were significant, including a significant portion of his
28 savings.

1 21. The financial toll on Mohammad related to the costs of this litigation have been
2 significant, including a significant portion of his savings.

3 22. Hamid and Mohammad also suffered from stress related to losses to Meditex and
4 the stress of protracted litigation over approximately five years, including defending claims
5 asserted by Plaintiffs against them, including embezzlement.

6 **The Extent to which the Punished Conduct Offends the Public's Sense of Justice and**
7 **Propriety**

8 23. In reviewing the facts of this case, the offense to one's sense of justice is
9 egregious.

10 24. With regard to Mr. Safari and Mandana, their deceitful actions were directed to
11 their business partners, to whom they owed fiduciary duties.

12 25. The conduct occurred from the formation of Meditex, until its demise, and
13 involved repeated acts of misappropriation, lying, fraud and deceit.

14 **The Means which are Judged Necessary to Deter Future Misconduct of this Kind**

15 26. In reviewing the facts of this case, the assessment of punitive damages are
16 necessary to deter future misconduct of this kind.

17 27. Any of the foregoing findings of fact that are more properly characterized as
18 conclusions of law, or conclusions of law that are more properly characterized as findings of
19 fact, shall be so characterized.

20 **Conclusions of Law**

21 28. The Court refers to and incorporates all Conclusions of Law set forth in the 2019
22 Judgment to the extent such findings relate to the issue of punitive damages.

23 29. Three of the claims proven at trial against Mr. Safari support an award of punitive
24 damages: 1) tortious breach of the implied covenant of good faith and fair dealing,¹ 2) fraud/
25 fraudulent misrepresentation, and 3) breach of fiduciary duty.²

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28 ² *Clark v. Lubritz*, 113 Nev. 1089, 1098, 944 P.2d 861, 866-67 (1997) ("[W]e conclude that the breach of
fiduciary duty arising from the partnership agreement is a separate tort upon which punitive damages may
be based.")

1 30. With regard to the claims proven at trial against Mandana Zahedi, the claim of
2 breach of fiduciary duty supports a claim for punitive damages.³

3 31. With regard to the claims proven at trial against Nooshin Zahedi, the claim of
4 aiding and abetting breach of fiduciary duty supports an award for punitive damages.⁴

5 32. NRS 42.005(1) states,

6 [W]here it is proven by clear and convincing evidence that the defendant has been guilty
7 of oppression, fraud or malice, express or implied, the plaintiff, in addition to the
8 compensatory damages, may recover damages for the sake of example and by way of
9 punishing the defendant. Except as otherwise provided in this section or by specific
10 statute, an award of exemplary or punitive damages made pursuant to this section may
11 not exceed:

12 (a) Three times the amount of compensatory damages awarded to the plaintiff if the
13 amount of compensatory damages is \$100,000 or more....

14 33. NRS 42.001 sets forth the key definitions as follows:

15 1. “Conscious disregard” means the knowledge of the probable harmful
16 consequences of a wrongful act and a willful and deliberate failure to act
17 to avoid those consequences.

18 2. “Fraud” means an intentional misrepresentation, deception or
19 concealment of a material fact known to the person with the intent to
20 deprive another person of his or her rights or property or to otherwise
21 injure another person.

22 3. “Malice, express or implied” means conduct which is intended to
23 injure a person or despicable conduct which is engaged in with a
24 conscious disregard of the rights or safety of others.

25 4. “Oppression” means despicable conduct that subjects a person to cruel
26 and unjust hardship with conscious disregard of the rights of the person.

27
28 ³ *Id.*

⁴ *Id.* and *In re Amerco Derivative Litig.*, 127 Nev. 196, 225, 252 P.3d 681, 702 (2011).

1 34. At trial, it was proven by clear and convincing evidence that Mr. Safari, Mandana
2 Zahedi, and Nooshin Zahedi acted with conscious disregard, malice, express or implied,
3 oppression and fraud.

4 35. Hamid and Mohammad are entitled to an award of punitive damages pursuant to
5 NRS 42.005.

6 36. The Nevada Supreme Court has established various factors for a Court to consider
7 when determining the appropriate amount of punitive damages.

8 [W]e will consider a variety of factors including ‘the financial position of the
9 defendant, culpability and blameworthiness of the tortfeasor, vulnerability and injury
10 suffered by the offended party, the extent to which the punished conduct offends the
11 public's sense of justice and propriety, and the means which are judged necessary to
12 deter future misconduct of this kind.’ *Wohlers v. Bartgis*, 114 Nev. 1249, 1267, 969
P.2d 949, 962 (1998) (citing *Ace Truck v. Kahn*, 103 Nev. 503, 509-10, 746 P.2d
132, 136-37 (1987)). *See also, Evans v. Dean Witter Reynolds, Inc.*, 116 Nev. 598,
614, 5 P.3d 1043, 1053 (2000).

13
14 37. The Court considered evidence regarding the above factors and concludes as
15 follows.

16 **The Financial Position of the Counter-Defendants**

17 38. The financial position of Counter-Defendants is reasonably strong and is such that
18 the assessment of two times compensatory damages is appropriate.

19 **Culpability and Blameworthiness of the Tortfeasor**

20 39. The culpability and blameworthiness of Counter-defendants is significant such
21 that the assessment of two times compensatory damages is appropriate.

22 **Vulnerability and Injury Suffered by the Offended Party**

23 40. Under Nevada law, an “older person” for purposes of a claim for elder abuse, is
24 someone 60 years or older. *NRS 41.1395(4)(d)*.

25 41. Hamid is an older person under Nevada law, and is considered vulnerable.

26 42. The injury suffered by Hamid and Mohammad was significant, resulting in the
27 loss of significant amount of money, and a significant portion of their life’s savings.
28

1 43. The vulnerability and injury suffered by Counter-claimants is significant such that
2 the assessment of two times compensatory damages is appropriate.

3 **The Extent to which the Punished Conduct Offends the Public's Sense of Justice and**
4 **Propriety**

5 44. The repeated and ongoing improper actions of Counter-defendants is such that it
6 offends the public's sense of justice and propriety.

7 45. Pursuant to this factor, that the assessment of two times compensatory damages is
8 appropriate.

9 **The Means which are Judged Necessary to Deter Future Misconduct of this Kind**

10 46. The assessment of two times compensatory damages is appropriate and necessary
11 to deter misconduct of this kind.

12 **Breakdown of Punitive Damages Awarded**

13 47. Punitive/ Exemplary damages are awarded to Hamid and Mohammad and assessed
14 against Mr. Safari in the amount of \$810,950.00, which is two times the compensatory
15 damages award set forth in the 2019 Judgment.⁵

16 48. Punitive/ Exemplary damages are awarded to Hamid and Mohammad and assessed
17 against Mandana Zahedi in the amount of \$223,350, which is two times the
18 compensatory damages award set forth in the 2019 Judgment.⁶

19 49. Punitive/ Exemplary damages are awarded to Hamid and Mohammad and assessed
20 against Nooshin Zahedi in the amount of \$183,400, which is two times the compensatory
21 damages award set forth in the 2019 Judgment.⁷

22 50. Post-judgment interest on the punitive damages assessed is appropriate. *Evans v. Dean*
23 *Witter Reynolds, Inc.*, 116 Nev. 598, 615, 5 P.3d 1043, 1054 (2000) (“[P]ost-judgment
24 interest should accrue on an award for punitive damages, to compensate the plaintiff for
25 the loss of the use of the money awarded in the judgment until paid.”)
26

27 ⁵ See 2019 Judgment, page 48, line 18.

28 ⁶ See 2019 Judgment, page 48, line 22.

⁷ See 2019 Judgment, page 48, line 24.

1 51. Any of the foregoing findings of fact that are more properly characterized as conclusions
2 of law, or conclusions of law that are more properly characterized as findings of fact,
3 shall be so characterized.

4 **JUDGMENT**

5 This action came on for phase two of trial before the Court, Honorable Mark R. Denton,
6 District Court Judge, presiding, and the issues having been duly tried and a decision having been
7 duly rendered, IT IS HEREBY ORDERED and Adjudged that Counterclaimants Hamid
8 Modjtahed and Mohammad Mojtaled recover from the Counter-defendant Parviz Safari a.k.a.
9 Aidan Davis punitive/exemplary damages in the sum of \$810,950.00, with interest thereon at the
10 statutory rate as provided by law.

11 IT IS FURTHER ORDERED and Adjudged that Counterclaimants Hamid Modjtahed and
12 Mohammad Mojtaled recover from the Counter-defendant Mandana Zahedi punitive/exemplary
13 damages in the sum of \$223,350, with interest thereon at the statutory rate as provided by law.

14 IT IS FURTHER ORDERED and Adjudged that Counterclaimants Hamid Modjtahed and
15 Mohammad Mojtaled recover from the Counter-defendant Nooshin Zahedi punitive/exemplary
16 damages in the sum of \$183,400, with interest thereon at the statutory rate as provided by law.

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1 A final judgment, summarizing the 2019 Judgment, this Punitive Damages Judgment, as
2 well as the Court's February 26, 2020 Order granting attorneys' fees and the February 25, 2020
3 Order granting costs, as well as a calculation of interest, shall be issued separately.

4
5 DATED this 23 day of September, 2020.

6
7 
8 Judge, Eighth Judicial District Court
In and for Clark County, Nevada

8 Approved as to form and content by:


9 **FLAHIVE & ASSOCIATES**

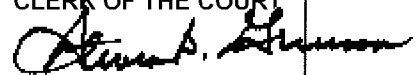
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11 By: NOT APPROVED
12 ANDREW S. FLAHIVE, ESQ.
13 Nevada Bar No. 9556
330 E. Warm Springs, Suite A-18
Las Vegas, NV 89119

14 *Attorneys for Plaintiffs/Counter-Defendants*

15
16 Respectfully submitted by:

17 **WILEY PETERSEN**

18 By:  8/3/20
19 JONATHAN D. BLUM, ESQ.
20 Nevada Bar No. 9515
1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
21 *Attorneys for Defendants/Counter-Claimants*



NEO

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515

WILEY PETERSEN

1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
Facsimile: (702) 553-3467
jblum@wileypetersenlaw.com

Attorney for Defendants/ Counter-Claimants

DISTRICT COURT

COUNTY OF CLARK, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,
a Nevada limited liability company,
Plaintiff,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company;
MOHAMMAD MOJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**NOTICE OF ENTRY OF FINDINGS
OF FACT, CONCLUSIONS OF LAW,
AND JUDGMENT REGARDING
PUNITIVE DAMAGES**

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the Findings of Fact, Conclusions of Law, and Judgment Regarding Punitive Damages was entered in the above entitled matter on the 23rd day of September 2020, a copy of which is attached hereto.

DATED this 2 of September 2020.

WILEY PETERSEN

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515
1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
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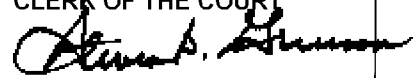
Attorney for Defendants/ Counter-Claimants

1
2 **CERTIFICATE OF SERVICE**

3 I hereby certify that I an employee of WILEY PETERSEN, and the 24th day of
4 September 2020, I caused to be served a true and correct copy of the foregoing **NOTICE OF ENTRY**
5 **OF FINDINGS OF FACT, CONCLUSIONS OF LAW, AND JUDGMENT REGARDING**
6 **PUNITIVE DAMAGES** in the following manner:

7 (ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced
8 document was electronically filed on the date hereof and served through the Notice of Electronic Filing
9 automatically generated by the Court's facilities to those parties listed on the Court's Master Service
10 List.

11
12
13 /s/ Ivette Bautista
14 An Employee of WILEY PETERSEN
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FFCL
JONATHAN D. BLUM, ESQ.
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Facsimile: (702) 362-9472
E-Mail: jblum@wileypetersenlaw.com

Attorneys for Defendants/Counter-Claimants

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CLARK COUNTY, NEVADA

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Plaintiff,

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MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

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Counter-Claimants,

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PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
JUDGMENT REGARDING
PUNITIVE DAMAGES**

1 **FINDINGS OF FACT, CONCLUSIONS OF LAW, AND JUDGMENT**

2 This matter came before this Court for Trial on multiple dates, beginning on May 21,
3 2019 through August 7, 2019. The Court entered Findings of Fact, Conclusions of Law and
4 Judgment on September 27, 2019 (the “2019 Judgment”), which stated, in part, “A subsequent
5 proceeding, pursuant to NRS 42.005(3), shall be conducted to determine the amount of punitive
6 damages to be assessed.” The second phase of trial regarding punitive/ exemplary damages was
7 conducted on July 15, 2020.

8 Andrew Scott Flahive, Esq. of Flahive & Associates, Ltd. appeared on behalf of the
9 Plaintiffs/Counter-Defendants, and Jonathan D. Blum, Esq. of Wiley Petersen appeared on
10 behalf of the Defendants/Counter-Claimants. The Court, having considered the papers and
11 pleadings on file, the oral and written arguments of counsel, witness testimony and other
12 evidence at the punitive damages phase of trial, entered a Minute Order on August 3, 2020. The
13 Court hereby makes its Findings of Fact and Conclusions of Law and enters Judgment as
14 follows:

15 **Findings of Fact**

16 1. The Court refers to and incorporates all Findings of Fact set forth in the 2019
17 Judgment to the extent such findings relate to the issue of punitive damages.

18 2. Hamid Modjtahed ("Hamid") and Mohammad Mojtaheh ("Mohammad") are
19 referred to as "Defendants" or "Counterclaimants".

20 3. Parviz Safari aka Aidan Davis ("Mr. Safari") and Mandana Zahedi ("Mandana")
21 are referred to as “Plaintiffs” or “Counter-defendants”.

22 4. Nooshin Zahedi ("Nooshin") is referred to as a "Counter-defendant".

23 **Factors Relevant to the Assessment of Punitive Damages**

24 **The Financial Position of the Counter-Defendants**

25 5. In 2016 Mr. Safari and Mandana formed a company called Aimans Enterprises,
26 LLC ("Aimans"). *Exhibit 4: PUNI000296 – PUNI000299; Exhibit 47: PUNI000292-*
27 *PUNI000293.*

28 6. Mr. Safari and Mandana are the sole members and managers of Aimans. *Id.*

1 7. In November, 2016, Mr. Safari and Mandana opened a bank account for Aimans
2 and are listed as its sole owners.

3 8. From late 2016 through late 2019, Mr. Safari and Mandana received significant
4 funds, on a regular basis, into the business account for Aimans. Such funds range from
5 approximately \$65,000 per year, to more than \$130,000 per year. *See Exhibit 12: PUNI01690,*
6 *Exhibit 11: PUNI01682, Exhibit 10: PUNI01672, Exhibit 9: PUNI01664, Exhibit 8: PUNI01656,*
7 *Exhibit 7: PUNI01646, Exhibit 6: PUNI01630, Exhibit 5: PUNI01614; Exhibit 73: PUNI00356,*
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16 9. Mr. Safari and Mandana also received significant amounts of money into various
17 other personal bank accounts including at Wells Fargo, US Bank, Bank of America and Chase.
18 Such funds, together, total more than \$500,000 from late 2016 through late 2019. *See Exhibit*
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3 10. Mr. Safari is a trained petroleum engineer.

4 11. Mandana Zahedi is a trained medical doctor.

5 **Culpability and Blameworthiness of the Tortfeasor**

6 12. The Court refers to and incorporates various factual findings set forth in the 2019
7 Judgment that address the culpability and blameworthiness of the Tortfeasor. *See* 2019
8 Judgment, p. 8, ¶42 – p.24, ¶157.

9 13. Such findings include those related to numerous willful fraudulent schemes
10 involving complex planning, coordination and execution, the creation of fraudulent documents
11 and the creation of a shell company used to fool Hamid and Mohammad. *Id.*

12 14. Counter-defendants engaged in purposeful deceit over many years, resulting in
13 improper acquisition of money from Hamid and Mohammad. *Id.*

14 15. Plaintiffs asserted claims against Hamid and Mohammad that were without merit,
15 most of which were disposed of by summary judgment, and the rest failed at trial. *Id.* at p. 2, ¶1
16 – p. 6, ¶23; p. 26, ¶1 – p. 28, ¶12.

17 **Vulnerability and Injury Suffered by the Offended Party**

18 16. Hamid was born in 1947, and was over 60 in 2010 when the Company was
19 formed and the frauds began.

20 17. Hamid is an elderly man aged 74.

21 18. The financial toll on Hamid related to the financial losses to him related to
22 investments he made into Meditex were significant, including a significant portion of his
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25 significant, including a significant portion of his savings.

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2 significant, including a significant portion of his savings.

3 22. Hamid and Mohammad also suffered from stress related to losses to Meditex and
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5 asserted by Plaintiffs against them, including embezzlement.

6 **The Extent to which the Punished Conduct Offends the Public's Sense of Justice and**
7 **Propriety**

8 23. In reviewing the facts of this case, the offense to one's sense of justice is
9 egregious.

10 24. With regard to Mr. Safari and Mandana, their deceitful actions were directed to
11 their business partners, to whom they owed fiduciary duties.

12 25. The conduct occurred from the formation of Meditex, until its demise, and
13 involved repeated acts of misappropriation, lying, fraud and deceit.

14 **The Means which are Judged Necessary to Deter Future Misconduct of this Kind**

15 26. In reviewing the facts of this case, the assessment of punitive damages are
16 necessary to deter future misconduct of this kind.

17 27. Any of the foregoing findings of fact that are more properly characterized as
18 conclusions of law, or conclusions of law that are more properly characterized as findings of
19 fact, shall be so characterized.

20 **Conclusions of Law**

21 28. The Court refers to and incorporates all Conclusions of Law set forth in the 2019
22 Judgment to the extent such findings relate to the issue of punitive damages.

23 29. Three of the claims proven at trial against Mr. Safari support an award of punitive
24 damages: 1) tortious breach of the implied covenant of good faith and fair dealing,¹ 2) fraud/
25 fraudulent misrepresentation, and 3) breach of fiduciary duty.²

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27 ¹ *Hilton Hotels v. Butch Lewis Productions*, 109 Nev. 1043, 1046-47, 862 P.2d 1207, 1209 (1993).

28 ² *Clark v. Lubritz*, 113 Nev. 1089, 1098, 944 P.2d 861, 866-67 (1997) ("[W]e conclude that the breach of
fiduciary duty arising from the partnership agreement is a separate tort upon which punitive damages may
be based.")

1 30. With regard to the claims proven at trial against Mandana Zahedi, the claim of
2 breach of fiduciary duty supports a claim for punitive damages.³

3 31. With regard to the claims proven at trial against Nooshin Zahedi, the claim of
4 aiding and abetting breach of fiduciary duty supports an award for punitive damages.⁴

5 32. NRS 42.005(1) states,

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12 (a) Three times the amount of compensatory damages awarded to the plaintiff if the
13 amount of compensatory damages is \$100,000 or more....

14 33. NRS 42.001 sets forth the key definitions as follows:

15 1. “Conscious disregard” means the knowledge of the probable harmful
16 consequences of a wrongful act and a willful and deliberate failure to act
17 to avoid those consequences.

18 2. “Fraud” means an intentional misrepresentation, deception or
19 concealment of a material fact known to the person with the intent to
20 deprive another person of his or her rights or property or to otherwise
21 injure another person.

22 3. “Malice, express or implied” means conduct which is intended to
23 injure a person or despicable conduct which is engaged in with a
24 conscious disregard of the rights or safety of others.

25 4. “Oppression” means despicable conduct that subjects a person to cruel
26 and unjust hardship with conscious disregard of the rights of the person.

27
28 ³ *Id.*

⁴ *Id.* and *In re Amerco Derivative Litig.*, 127 Nev. 196, 225, 252 P.3d 681, 702 (2011).

1 34. At trial, it was proven by clear and convincing evidence that Mr. Safari, Mandana
2 Zahedi, and Nooshin Zahedi acted with conscious disregard, malice, express or implied,
3 oppression and fraud.

4 35. Hamid and Mohammad are entitled to an award of punitive damages pursuant to
5 NRS 42.005.

6 36. The Nevada Supreme Court has established various factors for a Court to consider
7 when determining the appropriate amount of punitive damages.

8 [W]e will consider a variety of factors including ‘the financial position of the
9 defendant, culpability and blameworthiness of the tortfeasor, vulnerability and injury
10 suffered by the offended party, the extent to which the punished conduct offends the
11 public's sense of justice and propriety, and the means which are judged necessary to
12 deter future misconduct of this kind.’ *Wohlers v. Bartgis*, 114 Nev. 1249, 1267, 969
P.2d 949, 962 (1998) (citing *Ace Truck v. Kahn*, 103 Nev. 503, 509-10, 746 P.2d
132, 136-37 (1987)). *See also, Evans v. Dean Witter Reynolds, Inc.*, 116 Nev. 598,
614, 5 P.3d 1043, 1053 (2000).

13
14 37. The Court considered evidence regarding the above factors and concludes as
15 follows.

16 **The Financial Position of the Counter-Defendants**

17 38. The financial position of Counter-Defendants is reasonably strong and is such that
18 the assessment of two times compensatory damages is appropriate.

19 **Culpability and Blameworthiness of the Tortfeasor**

20 39. The culpability and blameworthiness of Counter-defendants is significant such
21 that the assessment of two times compensatory damages is appropriate.

22 **Vulnerability and Injury Suffered by the Offended Party**

23 40. Under Nevada law, an “older person” for purposes of a claim for elder abuse, is
24 someone 60 years or older. *NRS 41.1395(4)(d)*.

25 41. Hamid is an older person under Nevada law, and is considered vulnerable.

26 42. The injury suffered by Hamid and Mohammad was significant, resulting in the
27 loss of significant amount of money, and a significant portion of their life’s savings.
28

1 43. The vulnerability and injury suffered by Counter-claimants is significant such that
2 the assessment of two times compensatory damages is appropriate.

3 **The Extent to which the Punished Conduct Offends the Public's Sense of Justice and**
4 **Propriety**

5 44. The repeated and ongoing improper actions of Counter-defendants is such that it
6 offends the public's sense of justice and propriety.

7 45. Pursuant to this factor, that the assessment of two times compensatory damages is
8 appropriate.

9 **The Means which are Judged Necessary to Deter Future Misconduct of this Kind**

10 46. The assessment of two times compensatory damages is appropriate and necessary
11 to deter misconduct of this kind.

12 **Breakdown of Punitive Damages Awarded**

13 47. Punitive/ Exemplary damages are awarded to Hamid and Mohammad and assessed
14 against Mr. Safari in the amount of \$810,950.00, which is two times the compensatory
15 damages award set forth in the 2019 Judgment.⁵

16 48. Punitive/ Exemplary damages are awarded to Hamid and Mohammad and assessed
17 against Mandana Zahedi in the amount of \$223,350, which is two times the
18 compensatory damages award set forth in the 2019 Judgment.⁶

19 49. Punitive/ Exemplary damages are awarded to Hamid and Mohammad and assessed
20 against Nooshin Zahedi in the amount of \$183,400, which is two times the compensatory
21 damages award set forth in the 2019 Judgment.⁷

22 50. Post-judgment interest on the punitive damages assessed is appropriate. *Evans v. Dean*
23 *Witter Reynolds, Inc.*, 116 Nev. 598, 615, 5 P.3d 1043, 1054 (2000) (“[P]ost-judgment
24 interest should accrue on an award for punitive damages, to compensate the plaintiff for
25 the loss of the use of the money awarded in the judgment until paid.”)
26

27 ⁵ See 2019 Judgment, page 48, line 18.

28 ⁶ See 2019 Judgment, page 48, line 22.

⁷ See 2019 Judgment, page 48, line 24.

1 51. Any of the foregoing findings of fact that are more properly characterized as conclusions
2 of law, or conclusions of law that are more properly characterized as findings of fact,
3 shall be so characterized.

4 **JUDGMENT**

5 This action came on for phase two of trial before the Court, Honorable Mark R. Denton,
6 District Court Judge, presiding, and the issues having been duly tried and a decision having been
7 duly rendered, IT IS HEREBY ORDERED and Adjudged that Counterclaimants Hamid
8 Modjtahed and Mohammad Mojtaled recover from the Counter-defendant Parviz Safari a.k.a.
9 Aidan Davis punitive/exemplary damages in the sum of \$810,950.00, with interest thereon at the
10 statutory rate as provided by law.

11 IT IS FURTHER ORDERED and Adjudged that Counterclaimants Hamid Modjtahed and
12 Mohammad Mojtaled recover from the Counter-defendant Mandana Zahedi punitive/exemplary
13 damages in the sum of \$223,350, with interest thereon at the statutory rate as provided by law.

14 IT IS FURTHER ORDERED and Adjudged that Counterclaimants Hamid Modjtahed and
15 Mohammad Mojtaled recover from the Counter-defendant Nooshin Zahedi punitive/exemplary
16 damages in the sum of \$183,400, with interest thereon at the statutory rate as provided by law.

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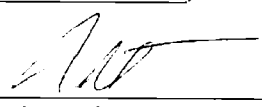
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1 A final judgment, summarizing the 2019 Judgment, this Punitive Damages Judgment, as
2 well as the Court's February 26, 2020 Order granting attorneys' fees and the February 25, 2020
3 Order granting costs, as well as a calculation of interest, shall be issued separately.

4
5 DATED this 23 day of September, 2020.

6
7 
8 Judge, Eighth Judicial District Court
In and for Clark County, Nevada

8 Approved as to form and content by:


9 **FLAHIVE & ASSOCIATES**

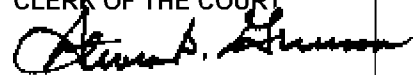
10
11 By: NOT APPROVED
12 ANDREW S. FLAHIVE, ESQ.
13 Nevada Bar No. 9556
330 E. Warm Springs, Suite A-18
Las Vegas, NV 89119

14 *Attorneys for Plaintiffs/Counter-Defendants*

15
16 Respectfully submitted by:

17 **WILEY PETERSEN**

18 By:  8/3/20
19 JONATHAN D. BLUM, ESQ.
20 Nevada Bar No. 9515
1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
21 *Attorneys for Defendants/Counter-Claimants*



JUDG

JONATHAN D. BLUM, ESQ.

Nevada Bar No. 09515

WILEY PETERSEN

1050 Indigo Dr., Suite 200B

Las Vegas, Nevada 89145

Telephone No.: (702) 910-3329

Facsimile: (702) 362-9472

E-Mail: jblum@wileypetersenlaw.com

Attorneys for Defendants/Counter-Claimants

DISTRICT COURT

CLARK COUNTY, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,
a Nevada limited liability company,
Plaintiff,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company;
MOHAMMAD MOJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

FINAL JUDGMENT

1 **FINAL JUDGMENT**

2 This matter came before this Court for Trial on multiple dates, beginning on May 21, 2019
3 through August 7, 2019, as well as July 15, 2020 for the punitive damages phase of trial. The
4 Court entered Findings of Fact, Conclusions of Law and Judgment on September 27, 2019 (the
5 “2019 Judgment”), as well as on _____, 2020 following the punitive damages phase of
6 trial (the “Punitive Judgment”). On the February 25, 2020 the Court entered an Order granting
7 costs to Counter-claimants. Additionally, on February 26, 2020 the Court entered an Order
8 granting attorneys’ fees to Counter-Claimants. The Court now enters a final judgment, combining
9 all such rulings, as well as applying interest at the statutory rate, as follows.

10
11 IT IS HEREBY ORDERED and Adjudged that Counterclaimants Hamid Modjtahed and
12 Mohammad Mojtaheh recover from Counter-defendant Parviz Safari a.k.a. Aidan Davis, and that
13 judgment is entered against Counter-defendant Parviz Safari a.k.a. Aidan Davis, as follows:

14 \$405,475.00 in compensatory damages

15 \$382,344.50 in attorneys’ fees

16 \$104,200.51 in costs

17 \$810,950.00 in punitive damages

18 \$378,661.57 in prejudgment interest, calculated from June 13, 2016 (Date of filing of
19 Counterclaim) through August 31, 2020

20 **\$2,081,631.58 TOTAL**

21 Post judgment interest to continue to accrue at the statutory rate from September 1, 2020
22 until judgment is paid in full.

23
24 IT IS HEREBY FURTHER ORDERED and Adjudged that Counterclaimants Hamid
25 Modjtahed and Mohammad Mojtaheh recover from the Counter-defendant Mandana Zahedi, and
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28 \$65,000.00 in attorneys’ fees

1 \$104,200.51 in costs
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3 \$104,290.11 in prejudgment interest, calculated from June 13, 2016 (Date of filing of
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1 IT IS HEREBY FURTHER ORDERED and Adjudged that Counterclaimants Hamid
2 Modjtahed and Mohammad Mojtahed recover from the Counter-defendant Nooshin Zahedi, and
3 that judgment is entered against Counter-defendant Nooshin Zahedi, as follows:

4 \$91,700.00 in compensatory damages

5 \$104,200.51 in costs

6 \$183,400.00 in punitive damages

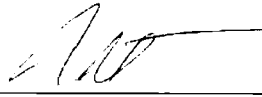
7 \$85,636.02 in prejudgment interest, calculated from June 13, 2016 (Date of filing of
8 Counterclaim) through August 31, 2020

9 **\$464,936.53 TOTAL**

10 Post judgment interest to continue to accrue at the statutory rate from September 1, 2020
11 until judgment is paid in full.

12 IT IS SO ORDERED.

13 DATED this 23 day of September, 2020.

14 
15 _____
16 Judge, Eighth Judicial District Court
17 In and for Clark County, Nevada

16 Approved as to form and content by:

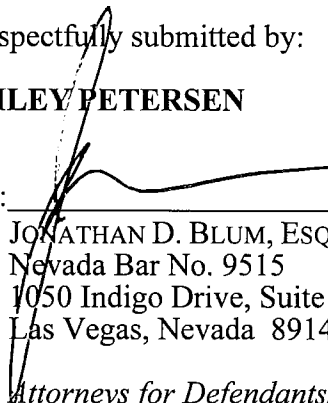
17 **FLAHIVE & ASSOCIATES**

18 By: /s/ Andrew Flahive
19 ANDREW S. FLAHIVE, ESQ.
20 Nevada Bar No. 9556
21 330 E. Warm Springs, Suite A-18
22 Las Vegas, NV 89119

Attorneys for Plaintiffs/Counter-Defendants

23 Respectfully submitted by:

24 **WILEY PETERSEN**

25 By:  8/31/20
26 JONATHAN D. BLUM, ESQ.
27 Nevada Bar No. 9515
28 1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145

Attorneys for Defendants/Counter-Claimants

From: [Andrew Scott Flahive](#)
To: jblum@wileypetersenlaw.com
Cc: ibautista@wileypetersenlaw.com
Subject: RE: 00449 Meditex Final Judgment
Date: Thursday, August 27, 2020 8:56:04 AM
Attachments: [image002.png](#)

John:

I am fine with the Judgement and Interest.

For the Finding of facts, I have some thoughts:

11-calrrfiy she is trained as a medical doctor but not licensed in the USA (not a huge deal, but since other smaller changes need to be made)

15-"frivolous" my biggest disagreement. I'm fine with the rest of the paragraph which claims they lost, but "frivolous"....no

"a significant portion" used in 18, 19, 20, 21, 42....and then you admit that is not true in paragraph 38

15 is the one I am adamant on, and I do believe if that is the only request I made, Judge Denton will agreeem.

I am doing paperwork all day so feel free to call. (or respond by email)

Thank you

702 834 8664

From: jblum@wileypetersenlaw.com <jblum@wileypetersenlaw.com>
Sent: Monday, August 24, 2020 5:05 PM
To: 'Andrew Scott Flahive' <flahivelaw@cox.net>
Cc: ibautista@wileypetersenlaw.com
Subject: 00449 Meditex Final Judgment

Andrew,

Please see attached. Let me know if you have suggested changes. If not, let me know if I can affix your e-signature.

Thanks,
Jon

Jonathan D. Blum, Esq.



1050 Indigo Drive, Suite 200B

Las Vegas, Nevada 89145

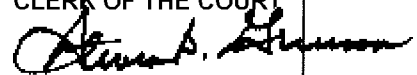
Office 702.910.3329 | Mobile 702.443.0677

jblum@wileypetersenlaw.com

www.wileypetersenlaw.com



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NEO

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515

WILEY PETERSEN
1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
Facsimile: (702) 553-3467
jblum@wileypetersenlaw.com

Attorney for Defendants/ Counter-Claimants

DISTRICT COURT

COUNTY OF CLARK, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,
a Nevada limited liability company,
Plaintiff,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**NOTICE OF ENTRY OF FINAL
JUDGMENT**

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company;
MOHAMMAD MOJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

1 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the Final Judgment was
2 entered in the above entitled matter on the 23rd day of September 2020, a copy of which is attached
3 hereto.

4 DATED this 27 of September 2020.

WILEY PETERSEN

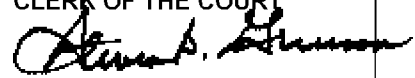
JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515
1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
Facsimile: (702) 553-3467
jblum@wileypetersenlaw.com

*Attorney for Defendants/ Counter-
Claimants*

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(ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

/s/ Ivette Bautista
An Employee of WILEY PETERSEN



JUDG

JONATHAN D. BLUM, ESQ.

Nevada Bar No. 09515

WILEY PETERSEN

1050 Indigo Dr., Suite 200B

Las Vegas, Nevada 89145

Telephone No.: (702) 910-3329

Facsimile: (702) 362-9472

E-Mail: jblum@wileypetersenlaw.com

Attorneys for Defendants/Counter-Claimants

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CLARK COUNTY, NEVADA

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individually and on behalf of MEDITEX, LLC,
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Plaintiff,

vs.

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MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
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Counter-Claimants,

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ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

FINAL JUDGMENT

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3 through August 7, 2019, as well as July 15, 2020 for the punitive damages phase of trial. The
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5 “2019 Judgment”), as well as on _____, 2020 following the punitive damages phase of
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7 costs to Counter-claimants. Additionally, on February 26, 2020 the Court entered an Order
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25 Modjtahed and Mohammad Mojtaheh recover from the Counter-defendant Mandana Zahedi, and
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16 Approved as to form and content by:

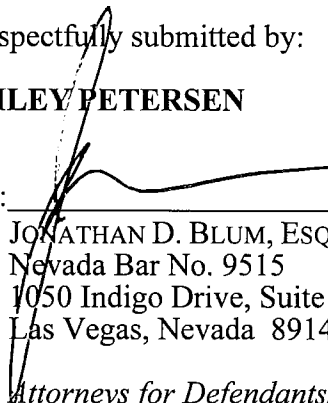
17 **FLAHIVE & ASSOCIATES**

18 By: /s/ Andrew Flahive
19 ANDREW S. FLAHIVE, ESQ.
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22 Las Vegas, NV 89119

Attorneys for Plaintiffs/Counter-Defendants

23 Respectfully submitted by:

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25 By:  8/31/20
26 JONATHAN D. BLUM, ESQ.
27 Nevada Bar No. 9515
28 1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145

Attorneys for Defendants/Counter-Claimants

From: [Andrew Scott Flahive](#)
To: jblum@wileypetersenlaw.com
Cc: ibautista@wileypetersenlaw.com
Subject: RE: 00449 Meditex Final Judgment
Date: Thursday, August 27, 2020 8:56:04 AM
Attachments: [image002.png](#)

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For the Finding of facts, I have some thoughts:

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I am doing paperwork all day so feel free to call. (or respond by email)

Thank you

702 834 8664

From: jblum@wileypetersenlaw.com <jblum@wileypetersenlaw.com>
Sent: Monday, August 24, 2020 5:05 PM
To: 'Andrew Scott Flahive' <flahivelaw@cox.net>
Cc: ibautista@wileypetersenlaw.com
Subject: 00449 Meditex Final Judgment

Andrew,

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Thanks,
Jon

Jonathan D. Blum, Esq.



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Las Vegas, Nevada 89145

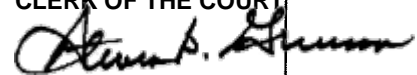
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ORDR

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515

WILEY PETERSEN

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Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
Fax: (702) 553-3467
jblum@wileypetersenlaw.com

Attorneys for Defendants/Counter-Claimants

DISTRICT COURT

CLARK COUNTY, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,
a Nevada limited liability company,

Plaintiff,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**ORDER DENYING
PLAINTIFFS'/COUNTER-
DEFENDANT'S MOTION TO
ALTER OR AMEND THE
JUDGMENT AND FOR NEW TRIAL**

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company;
MOHAMMAD MOJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

1 This matter came before the Court on November 23, 2020 on Plaintiffs/Counter-Defendants,
2 Parviz Safari, Mandana Safari and Nooshin Zahedi's (hereafter collectively "Counter-Defendants")
3 Motion to Alter or Amend the Judgment and for New Trial filed on October 21, 2020 ("Motion"). Tom
4 W. Stewart, Esq. of The Powell Law Firm appeared on behalf of Counter-Defendants. Jonathan D.
5 Blum, Esq. of Wiley Petersen appeared on behalf of Defendants/Counter-Claimants Hamid Modjtahed
6 and Mohammad Mojtabeh (hereafter collectively "Counter-Claimants"). The Court having reviewed
7 Counter-Defendants' requests for relief pursuant to NRCP 52(b) and NRCP 59 on their merits,
8 including all points and authorities, and exhibits, having entertained oral argument, and good cause
9 appearing, finds as follows:

10 That Counter-Defendants' request for relief pursuant to NRCP 52(b) is without merit.

11 That Counter-Defendants' request for relief pursuant to NRCP 59(a) is without merit.

12 **ORDER**

13 IT IS HEREBY ORDERED that Counter-Defendants' Motion is DENIED.

14 IT IS FURTHER ORDERED that Counter-Claimants' request for attorneys' fees and costs
15 incurred in opposing the Motion is hereby DENIED.

16 **IT IS SO ORDERED.**

17 

18
19 December 03, 2020.

20 Approved as to form and content by:

21 **THE POWELL LAW FIRM**

22
23 /s/ Tom W. Stewart
24 TOM W. STEWART, ESQ.
25 Nevada Bar No. 14280
26 8918 Spanish Ridge Ave., Suite 100
27 Las Vegas, Nevada 89148

28 *Attorney for Plaintiffs/Counter-Defendants*

\\
\\

1 Respectfully Submitted by:

2 **WILEY PETERSEN**

3
4 12/3/20
5 JONATHAN D. BLUM, ESQ.
6 Nevada Bar No. 09515
7 1050 Indigo Drive, Suite 200B
8 Las Vegas, Nevada 89145

9 *Attorney for Defendants/Counter-Claimants*

10
11
12 See previous page for Judge Denton's Signature
13 December 03, 2020.
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From: Tom Stewart <TStewart@tplf.com>
Sent: Thursday, December 3, 2020 3:57 PM
To: jblum@wileypetersenlaw.com
Cc: ibautista@wileypetersenlaw.com
Subject: RE: 00449 - Order Denying Motion

You may affix my e signature

From: jblum@wileypetersenlaw.com <jblum@wileypetersenlaw.com>
Sent: Thursday, December 3, 2020 3:56 PM
To: Tom Stewart <TStewart@tplf.com>
Cc: ibautista@wileypetersenlaw.com
Subject: 00449 - Order Denying Motion

Tom,
Please see attached and let me know if I can affix your e-signature.

Thanks,
Jon

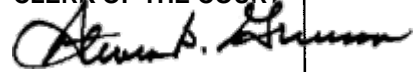
Jonathan D. Blum, Esq.



1050 Indigo Drive, Suite 200B
Las Vegas, Nevada 89145
Office 702.910.3329 | Mobile 702.443.0677
jblum@wileypetersenlaw.com
www.wileypetersenlaw.com



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NEO

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515

WILEY PETERSEN

1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
Facsimile: (702) 553-3467
jblum@wileypetersenlaw.com

Attorney for Defendants/ Counter-Claimants

DISTRICT COURT

COUNTY OF CLARK, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,
a Nevada limited liability company,
Plaintiff,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**NOTICE OF ENTRY OF ORDER
DENYING
PLAINTIFFS'/COUNTER-
DEFENDANTS' MOTION TO
ALTER OR AMEND THE
JUDGMENT AND FOR NEW TRIAL**

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company;
MOHAMMAD MOJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

///

1 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that an Order Denying
2 Plaintiffs'/Counter-defendants' Motion to Alter or Amend the Judgment and for New Trial was
3 entered in the above-entitled matter on the 4th day of December 2020, a copy of which is attached
4 hereto.

5 DATED this 8 of December 2020.

6 **WILEY PETERSEN**

7
8
9 JONATHAN D. BLUM, ESQ.
10 Nevada Bar No. 09515
11 1050 Indigo Dr., Suite 200B
12 Las Vegas, Nevada 89145
13 Telephone No. (702) 910-3329
14 Facsimile: (702) 553-3467
15 jblum@wileypetersenlaw.com

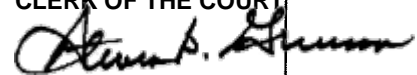
16 *Attorney for Defendants/ Counter-*
17 *Claimants*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am an employee of WILEY PETERSEN, and the 8th day of December
3 2020, I caused to be served a true and correct copy of the foregoing **NOTICE OF ENTRY OF**
4 **ORDER DENYING PLAINTIFFS'/COUNTER-DEFENDANT'S MOTION TO ALTER OR**
5 **AMEND THE JUDGMENT AND FOR NEW TRIAL** in the following manner:

6 (ELECTRONIC SERVICE) Pursuant to Administrative Order 14-2, the above-referenced
7 document was electronically filed on the date hereof and served through the Notice of Electronic Filing
8 automatically generated by the Court's facilities to those parties listed on the Court's Master Service
9 List.

10
11
12 /s/ Ivette Bautista
13 An Employee of WILEY PETERSEN
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ORDR

JONATHAN D. BLUM, ESQ.
Nevada Bar No. 09515

WILEY PETERSEN

1050 Indigo Dr., Suite 200B
Las Vegas, Nevada 89145
Telephone No. (702) 910-3329
Fax: (702) 553-3467
jblum@wileypetersenlaw.com

Attorneys for Defendants/Counter-Claimants

DISTRICT COURT

CLARK COUNTY, NEVADA

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,
a Nevada limited liability company,

Plaintiff,

vs.

HAMID MODJTAHED, an individual;
MOHAMMAD MOJTAHED, an individual;
ALI MOJTAHED, an individual; DOES I
through X; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

CASE NO. A-15-729030-B

DEPT NO. XIII

**ORDER DENYING
PLAINTIFFS'/COUNTER-
DEFENDANT'S MOTION TO
ALTER OR AMEND THE
JUDGMENT AND FOR NEW TRIAL**

HAMID MODJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company;
MOHAMMAD MOJTAHED, individually and
derivatively on behalf of MEDITEX, LLC, a
Nevada limited liability company,

Counter-Claimants,

vs.

PARVIZ SAFARI, an individual; MANDANA
ZAHEDI, an individual; NOOSHIN ZAHEDI,
an individual; UTSAFETY, LLC, a Utah
limited liability company; DOES I through X;
and ROE CORPORATIONS I through X,
inclusive,

Counter-Defendants.

1 This matter came before the Court on November 23, 2020 on Plaintiffs/Counter-Defendants,
2 Parviz Safari, Mandana Safari and Nooshin Zahedi's (hereafter collectively "Counter-Defendants")
3 Motion to Alter or Amend the Judgment and for New Trial filed on October 21, 2020 ("Motion"). Tom
4 W. Stewart, Esq. of The Powell Law Firm appeared on behalf of Counter-Defendants. Jonathan D.
5 Blum, Esq. of Wiley Petersen appeared on behalf of Defendants/Counter-Claimants Hamid Modjtahed
6 and Mohammad Mojtabeh (hereafter collectively "Counter-Claimants"). The Court having reviewed
7 Counter-Defendants' requests for relief pursuant to NRCP 52(b) and NRCP 59 on their merits,
8 including all points and authorities, and exhibits, having entertained oral argument, and good cause
9 appearing, finds as follows:

10 That Counter-Defendants' request for relief pursuant to NRCP 52(b) is without merit.

11 That Counter-Defendants' request for relief pursuant to NRCP 59(a) is without merit.

12 **ORDER**

13 IT IS HEREBY ORDERED that Counter-Defendants' Motion is DENIED.

14 IT IS FURTHER ORDERED that Counter-Claimants' request for attorneys' fees and costs
15 incurred in opposing the Motion is hereby DENIED.

16 **IT IS SO ORDERED.**

17 
18 _____
19 December 03, 2020.

20 Approved as to form and content by:

21 **THE POWELL LAW FIRM**

22
23 /s/ Tom W. Stewart
24 TOM W. STEWART, ESQ.
25 Nevada Bar No. 14280
26 8918 Spanish Ridge Ave., Suite 100
27 Las Vegas, Nevada 89148

28 *Attorney for Plaintiffs/Counter-Defendants*

\\
\\

1 Respectfully Submitted by:

2 **WILEY PETERSEN**

3
4 12/3/20
5 JONATHAN D. BLUM, ESQ.
6 Nevada Bar No. 09515
7 1050 Indigo Drive, Suite 200B
8 Las Vegas, Nevada 89145

9 *Attorney for Defendants/Counter-Claimants*

10
11
12 See previous page for Judge Denton's Signature
13 December 03, 2020.
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Thanks,
Jon

Jonathan D. Blum, Esq.



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**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 09, 2016

A-15-729030-B	Meditex, LLC, Plaintiff(s) vs. Hamid Modjtahed, Defendant(s)
---------------	--

May 09, 2016

9:00 AM

All Pending Motions

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 12A

COURT CLERK: Marwanda Knight

RECORDER: Martha Szramek

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Samuel Marshal, Esq., appearing on behalf of Plaintiff
Jonathan Blum, Esq., appearing on behalf of Defendant

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT - REQUEST FOR BUSINESS COURT PURSUANT TO EDCR 1.61(a)(1) and (a)(2)(ii) ... PLAINTIFF, MEDITEX, LLC's LIMITED OPPOSITION TO DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT AND COUNTERMOTION FOR LEAVE TO AMEND COMPLAINT

Following argument by counsel, Court stated its FINDINGS, and ORDERED, motion GRANTED with leave to amend. COURT FURTHER ORDERED, counter-motion GRANTED WITHOUT PREJUDICE to further proceedings. COURT DIRECTED counsel to promptly serve and file the amended complaint.

Mr. Marshal to submit a proposed order after assign the same by opposing counsel.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 11, 2016

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

**July 11, 2016 2:15 PM Mandatory Rule 16
Conference**

HEARD BY: Denton, Mark R.

COURTROOM: No Location

COURT CLERK: Marwanda Knight

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Samuel Marshall, Esq., appearing on behalf of Plaintiff
Jonathan D. Blum, Esq., appearing on behalf of Defendant

Counsel met with the Court in Chambers for the purpose of the Mandatory Rule 16 Conference, which counsel could also consider being their Rule 16.1 Conference. COURT ADVISED discovery is now heard by the Department for Business Court matters and all discovery motions should be directed to this Court's attention.

COURT DIRECTED counsel to submit a Joint Case Conference Report by the close of business on July 25, 2016, the JCCR is to comply with NRCP 16.1(c)(1,3, & 4); and ORDERED, status check SET for August 4, 2016 at 9:00am to determine if the Joint Case Conference Report (JCCR) has been filed. If filed, attendance is not required. However, if the JCCR has not been filed counsel must appear to explain why it has not been filed and the amount of time needed for compliance. COURT NOTED the case is being carried as a non-jury case.

Regarding the amount of time for discovery, Mr. Blum stated that considering the nature of the allegations, counsel would require one (1) year until the close of discovery. COURT ADVISED that

based upon that date the Department would issue a combined Scheduling/Trial Order.

As to having a Settlement Conference, Mr. Blum advised that the attorneys are optimistic that they may get to that point in the case, but they're not there yet. COURT ADVISED that if there is a consensus they are to contact the Department's Judicial Executive Assistant for assistance in scheduling with another Business Court Judge. If no consensus, the party that desires a Settlement Conference may file a motion to compel.

As to case management apart from discovery, counsel noted the need for a standard protective order that they will try to resolve by stipulation. COURT ADVISED that if they can't arrive at a stipulation to bring a motion. Thereafter, counsel did not acknowledge any additional issues that would require the Court's attention.

08/04/2016 9:00am | STATUS CHECK RE: JCCR FILING

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

October 03, 2016

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

**October 03, 2016 9:00 AM Motion to Withdraw as
Counsel**

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 12A

COURT CLERK: Marwanda Knight

RECORDER: Martha Szramek

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Samuel Marshall, Esq., appeared on behalf of Plaintiff, Meditex

At Shumway Van s Motion to Withdraw as Attorney of Record for: Meditex, LLC; Parviz Safari; Mandana Zahedi; Nooshin Zahedi; and UTSafety, LLC, Mr. Marshall advised he received a Substitution of Counsel filed on September 30, 2016, which resolves the matter and moots the motion on calendar. COURT SO NOTED.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 25, 2017

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

**May 25, 2017 9:00 AM Motion for Protective
Order**

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- COURT ORDERED, matter CONTINUED pursuant to Stipulation and Order.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 30, 2017

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

May 30, 2017

9:00 AM

All Pending Motions

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Court noted no appearances and advised it signed an order continuing today's hearing to July 10, 2017 at 9:00 a.m.

CONTINUED TO: 07/10/2017 9:00 A.M.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 05, 2017

A-15-729030-B	Meditex, LLC, Plaintiff(s) vs. Hamid Modjtahed, Defendant(s)
---------------	--

June 05, 2017	9:00 AM	Motion for Protective Order
----------------------	----------------	--

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Keen Ellsworth, Esq., appeared on behalf of Pltfs
Jonathan Blum, Esq., appeared on behalf of Defts

Counsel argued regarding Defts' attempt to depose the Pltfs' mother-in-law and the burden of the costs incurred. After hearing from both sides, COURT ORDERED, Motion DENIED; the Court will not hold the deponent in contempt, but will require that she, along with Pltfs' counsel, reimburse Defts for the costs incurred with the deponent's failure to appear, jointly and severally.

COURT FURTHER ORDERED that Pltf reschedule the deposition and that it take place within the next two (2) weeks.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 06, 2017

A-15-729030-B	Meditex, LLC, Plaintiff(s)
	vs.
	Hamid Modjtahed, Defendant(s)

July 06, 2017	2:39 PM	Minute Order
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HEARD BY: Denton, Mark R.	COURTROOM: RJC Courtroom 03D
----------------------------------	-------------------------------------

COURT CLERK: Marwanda Knight

RECORDER: Martha Szramek

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

-

Cause appearing, and pursuant to EDCR 2.20(e), EDCR 2.23(c), the Court GRANTS Defendants/Counter-Claimants Motion to Seal Exhibit J to Quash Subpoena and Motion for Protective Order and ORDERS such Motion removed from its civil motion calendar of Monday, July 10, 2017. Counsel for Defendants to submit proposed order.

IT IS SO ORDERED.

Attorneys:

Jonathan D. Blum, Esq.
KOLESAR & LEATHAM

Fax: 702-362-9472

Keen L. Ellsworth, Esq.
ELLSWORTH & BENNION, CHTD.

A-15-729030-B

Fax: 702-658-2502

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

August 24, 2017

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

August 24, 2017 9:00 AM Motion to Quash

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- APPEARANCES: Keen Ellsworth, Attorney for Pltfs
Jonathan Blum, Attorney for Defts

Following argument by counsel, Court stated its FINDINGS, and ORDERED, Motion DENIED, noting what counsel proposed relative to the "attorneys' eyes only" aspect is fair; the producing party is to provide the items relative to the fall of 2016 for "attorneys' eyes only" and determine if there is a need to confer with the clients. Additional colloquy regarding redactions.

Court directed Mr. Ellsworth to submit the proposed order after passing the same by Mr. Blum.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

January 04, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

**January 04, 2018 9:00 AM Motion to Extend
Discovery**

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Marwanda Knight

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
 Ellsworth, Keen L Attorney

JOURNAL ENTRIES

- Following arguments by counsel, COURT stated it was persuaded by the Deft's position, and ORDERED, Motion DENIED.

Mr. Blum to submit the proposed order after passing the same by Mr. Ellsworth.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

March 29, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

March 29, 2018 9:00 AM All Pending Motions

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Alice Jacobson

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Ellsworth, Keen L. Attorney
Walther, Eric D. Attorney

JOURNAL ENTRIES

- Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtahed

Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Mojtahed

Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims
Against Parvis Safari

Following arguments by counsel. COURT ORDERED, Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Parivs Safari, UNDER ADVISEMENT and an order will be issued from Chambers.

Following arguments by counsel regarding shipping. COURT ORDERED, Defendants/Counter-

Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Ali Mojtahed, GRANTED.

Following arguments by counsel regarding interference of an order canceled and returned. COURT ORDERED, Defendants/Counter-Claimants' Motion for Partial Summary Judgment Regarding the Claims Against Hamid Modjtahed and Mohammad Mojtahed, DENIED as to accounting claim; GRANTED as to the remaining claims as there were no genuine issues of matter fact remaining.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 16, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

April 16, 2018 9:00 AM Motion in Limine

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Alice Jacobson

RECORDER: Jennifer Gerold

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- No parties present. Court noted that it received a letter from Mr. Ellsworth to continue the motion.
COURT ORDERED, matter CONTINUED 4/23/18 9:00AM.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 23, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

April 23, 2018 9:00 AM Motion in Limine

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Aja Brown

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney

JOURNAL ENTRIES

- Following the representations of Mr. Blum, COURT ORDERED, Motion GRANTED. Court directed Mr. Blum to prepare the order.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 23, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

April 23, 2018 2:00 PM Calendar Call

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Aja Brown

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Ellsworth, Keen L Attorney

JOURNAL ENTRIES

- Upon Court's inquiry, Mr. Blum confirmed the parties have agreed to continue the trial. Mr. Blum further stated the basis of the continuance is Mr. Ellsworth's intention to withdraw from the case. Upon Mr. Blum's inquiry, Mr. Ellsworth indicated it is his belief the client will get the Substitution of Attorney signed and filed within the week and the September stack will be sufficient. Colloquy regarding counsel's availability for trial. COURT ORDERED, trial VACATED and RESET. Court provided counsel with a Standby trial date of May 4, 2018 at 2:00 PM.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 21, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

June 21, 2018

9:00 AM

All Pending Motions

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Vanessa Medina

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

Blum, Jonathan D.
Walther, Eric D.

Attorney
Attorney

JOURNAL ENTRIES

- Andrew Flahive, Esq., on behalf of Plaintiff, also present.

DEFENDANTS/ COUNTER-CLAIMANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON COUNTER-CLAIMANTS' NON-FRAUD CLAIMS AGAINST PARVIZ SAFARI...PLAINTIFF, PARVIZ SAFARI'S OPPOSITION TO DEFENDANT/ COUNTER CLAIMANTS MOTION FOR PARTIAL SUMMARY JUDGMENT ON COUNTER CLAIMANT'S NON FRAUD CLAIMS AGAINST PARVIZ SAFARI AND COUNTERMOTION TO REOPEN DISCOVERY

Mr. Flahive advised he was in the process of substituting as counsel. Arguments by Mr. Walther and Mr. Flahive. Court stated its findings, and ORDERED Motion GRANTED IN PART relative to the breach of contract claim; DENIED IN PART relative to the implied covenant of good faith and fair dealing. Court directed Plaintiff's Counsel to prepare the proposed order. COURT FURTHER ORDERED, Mr. Flahive's oral motion to reopen discovery, DENIED.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

September 17, 2018

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

September 17, 2018 10:00 AM Settlement Conference

HEARD BY: Allf, Nancy **COURTROOM:** RJC Courtroom 03A

COURT CLERK: Nicole McDevitt

RECORDER: Brynn White

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- A settlement conference was held before the honorable Nancy Allf in which parties were unable to settle.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

February 25, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

February 25, 2019 2:00 PM Calendar Call

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Counsel estimated trial to last 10-13 days and provided their availability to the Court. MATTER TRAILED.

MATTER RECALLED. Court provided counsel with a trial date and standby time. Mr. Blum noted given the out of state witnesses and so many parties, counsel would like to have a more definitive date to coordinate and prepare. Mr. Flahive concurred. COURT ORDERED, trial VACATED and to be RESET on the next stack. Mr. Flahive advised his schedule for July is completely open. Mr. Blum stated he will contact his clients to see when the best date would be and will contact the Court regarding resetting trial.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 04, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

**April 04, 2019 9:00 AM Motion for Preferential
Trial Setting**

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney

JOURNAL ENTRIES

- Court noted the Motion appears to be moot as trial has already been scheduled. Mr. Blum advised he was actually hoping to get a firm date. Court advised it does not give a firm setting on a motion for preferential trial setting, it will give the preference on the stack but if a firm setting is requested it needs to be further developed. Mr. Blum stated they are hoping they can get some sort of preference on the stack so they do not get bumped to the next stack at the time of the Calendar Call. COURT ORDERED, Defendants/ Counterclaimants' Hamid Modjtahed and Mohammed Mojtahed's Motion for Preferential Trial Setting GRANTED. Mr. Blum added he hopes to go on the May stack. Court so noted.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

April 29, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

April 29, 2019 **2:00 PM** **Calendar Call**

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Counsel confirmed 10-13 days for trial and provided their availability to the Court. MATTER TRAILED.

MATTER RECALLED. COURT ORDERED, trial date SET for May 21, 2019 at 9:00 am with Pre-Trial Memoranda DUE by close of business on May 17, 2019.

5/21/19 9:00 AM BENCH TRIAL

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****May 21, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

May 21, 2019**9:00 AM****Bench Trial****HEARD BY:** Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES****PRESENT:**

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Ali	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant
Safari, Parviz	Plaintiff
	Counter Defendant
Zahedi, Mandana	Plaintiff
	Counter Defendant

JOURNAL ENTRIES

- Farsi Interpreter, Ladan Dillon, present.

Exclusionary rule INVOKED. Arguments by counsel regarding Ali Mojtahed being excluded from the courtroom. Court allowed Ali Mojtahed to remain. Opening statements by Mr. Flahive and Mr. Blum. Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 5/22/19 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 22, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

May 22, 2019 9:00 AM Bench Trial

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Ali	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant
	Zahedi, Mandana	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Farsi Interpreter, Ladan Dillon, present.

Colloquy regarding trial schedule. Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 5/23/19 10:15 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****May 23, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

May 23, 2019**10:15 AM****Bench Trial****HEARD BY:** Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES****PRESENT:**

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Ali	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant
Safari, Parviz	Plaintiff
	Counter Defendant
Zahedi, Mandana	Plaintiff
	Counter Defendant

JOURNAL ENTRIES

- Mr. Blum advised the interpreter is not present today as the interpreter was not paid. Court so noted. Mr. Flahive had no objection to proceeding without an interpreter. Testimony and exhibits presented (see worksheets). COURT ORDERED, matter SET for Status Check.

5/28/19 2:00 PM STATUS CHECK: TRIAL SETTING

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

May 28, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

May 28, 2019 2:00 PM Status Check

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Counsel provided their availability to the Court for continuance of trial. MATTER TRAILED.

MATTER RECALLED. COURT ORDERED, trial date SET for June 12, 2019, with a standby date of June 7, 2019 at 2:00 p.m. If the case ahead of this case is still scheduled to go, then the trial date will be vacated and reset on another stack. COURT FURTHER ORDERED, trial date SET for June 25, 2019, with a standby date of June 21, 2019 at 2:00 p.m. If the case ahead of this case is still scheduled to go, then the trial date will be vacated and reset on another stack.

6/12/19 9:00 AM BENCH TRIAL

6/25/19 9:00 AM BENCH TRIAL

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****June 11, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

June 11, 2019**1:30 PM****Bench Trial****HEARD BY:** Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES****PRESENT:**

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant

JOURNAL ENTRIES

- Mr. Flahive advised Plaintiffs are not present as one Plaintiff is having medical issues and he will provide the Court with medical documentation this week. Mr. Blum advised he has set up defense witnesses this week as it is time for Mr. Safari's cross and he is not present. Mr. Flahive advised he has a rebuttal witness in Canada that he would like to set up travel arrangements for. Mr. Blum objected to the witness being called as he was not disclosed. Court advised it will not make an advanced ruling at this time. Court noted Plaintiff's case will be interrupted due to the availability issue and Defendants will now begin their case. Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 6/12/19 10:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 12, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

June 12, 2019 10:00 AM Bench Trial

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Flahive, Andrew Scott, ESQ Attorney
Modjtahed, Hamid Defendant
Counter Claimant
Mojtahed, Mohammad Defendant
Counter Claimant

JOURNAL ENTRIES

- Colloquy regarding Nooshin Zahedi being represented by counsel. Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 6/13/19 1:30 PM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****June 13, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

June 13, 2019 1:30 PM Bench Trial

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant

JOURNAL ENTRIES

- Testimony and exhibits presented (see worksheets). Mr. Blum sought default against Nooshin Zahedi. Upon Court's inquiry, Mr. Blum confirmed he subpoenaed her. COURT ORDERED, default ENTERED against Nooshin Zahedi. Mr. Blum and Mr. Flahive provided the Court with copies of medical documents and emails regarding Mr. Safari's medical condition. Mr. Blum argued in support of his request to strike Plaintiffs' remaining accounting claim due to the nonappearance of Mr. Safari. Court advised it will withhold ruling at this time. Court directed counsel to make redactions to the documents and provide them back to the Court to be made a part of the record.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 14, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

June 14, 2019

1:30 PM

Bench Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant

JOURNAL ENTRIES

- Testimony and exhibits presented (see worksheets). Default Against Counter-Defendant, Nooshin Zahedi SIGNED IN OPEN COURT. COURT ORDERED, trial CONTINUED.

CONTINUED TO: 6/19/19 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****June 19, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

June 19, 2019 9:00 AM Bench Trial

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant
	Zahedi, Mandana	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Testimony and exhibits presented (see worksheets).

IN CHAMBERS: Court met with counsel in Chambers to discuss scheduling. Colloquy regarding scheduling the Motions filed by Mr. Flahive last night. COURT ORDERED, Motion to Allow Testimony of PMK Yusen Logistics (Canada), Inc. and/or Bill Carter and Motion to Vacate Order Granting Counterclaimants' Motion in Limine to Exclude Reference to Illegal Sales to Iran or in the Alternative to be Allowed to Elicit Testimony Regarding Sanctions Against Iran SET for Tuesday, June 25th at 9:00 am. Due to the availability of counsel, COURT FURTHER ORDERED, trial date of June 28, 2019 VACATED. Court advised it will discuss scheduling the resumption of trial on Friday.

Mr. Blum estimated needing 4 more days beyond what is scheduled.

Testimony and exhibits continued (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 6/21/19 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 21, 2019

A-15-729030-B	Meditex, LLC, Plaintiff(s)
	vs.
	Hamid Modjtahed, Defendant(s)

June 21, 2019

9:00 AM

Bench Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Lorna Shell

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant
Safari, Parviz	Plaintiff
	Counter Defendant

JOURNAL ENTRIES

- Also present was Ladan Dillon, Farsi Interpreter.

Testimony and Exhibits presented (see worksheets).

Following colloquy regarding availability of counsel during the month of July, COURT ORDERED, Trial Dates SET; Trial CONTINUED.

CONTINUED TO: 06/25/19 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 25, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

June 25, 2019 9:00 AM All Pending Motions

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- MOTION TO ALLOW TESTIMONY OF PMK YUSEN LOGISTICS (CANADA), INC. AND/OR BILL CARTER...MOTION TO VACATE ORDER GRANTING COUNTERCLAIMANTS' MOTION IN LIMINE TO EXCLUDE REFERENCE TO ILLEGAL SALES TO IRAN OR IN THE ALTERNATIVE TO BE ALLOWED TO ELICIT TESTIMONY REGARDING SANCTIONS AGAINST IRAN...BENCH TRIAL

Farsi Interpreter, Ladan Dillon, present.

Arguments by Mr. Flahive and Mr. Blum regarding the Motion to Allow Testimony of PMK Yusen Logistics (Canada), Inc. and/or Bill Carter. COURT ORDERED, Motion GRANTED conditionally; only one 30(b)(6) witness will be allowed to testify; the witness will have to testify in open court, not

by telephone or other means; Defendant is allowed to depose him in Las Vegas at the expense and cost of Plaintiff; the deposition needs to be set up before the witness is allowed to testify. Mr. Flahive to prepare the order. Court noted the deposition could take place the day before the witness testifies. Arguments by Mr. Flahive and Mr. Blum regarding the Motion to Vacate Order Granting Counterclaimants' Motion in Limine to Exclude Reference to Illegal Sales to Iran or in the Alternative to be Allowed to Elicit Testimony Regarding Sanctions Against Iran. COURT ORDERED, Motion DENIED; Court noted it will not allow the evidence unless the door is opened. Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 6/26/19 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 26, 2019

A-15-729030-B	Meditex, LLC, Plaintiff(s)
	vs.
	Hamid Modjtahed, Defendant(s)

June 26, 2019

9:00 AM

Bench Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant
Safari, Parviz	Plaintiff
	Counter Defendant

JOURNAL ENTRIES

- Farsi Interpreter, Ladan Dillon, present.

Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 6/27/19 10:30 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****June 27, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

June 27, 2019 10:30 AM Bench Trial

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Farsi Interpreter, Ladan Dillon, present.

Testimony and exhibits presented (see worksheets). Colloquy regarding scheduling of the 30(b)(6) witness' deposition. Court advised the deposition can be taken by videoconference at the expense of Plaintiff with a 24 hour turnaround time on the transcript. COURT ORDERED, Status Check SET for July 11th at 9:00 am. Court noted they will discuss at that time the day testimony will be given by that witness and deposition scheduling. Mr. Blum requested to receive the name of the witness and witness information by July 8th at 2:00 pm; COURT SO ORDERED. COURT FURTHER ORDERED, trial SET for an additional day on July 17th at 1:30 pm.

7/11/19 9:00 AM STATUS CHECK: 30(B)(6) WITNESS

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 11, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

July 11, 2019 9:00 AM Status Check

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT: Blum, Jonathan D. Attorney
 Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Mr. Blum advised he has received the name of the PMK witness and counsel have been discussing dates for the deposition and trial testimony. Mr. Blum noted when the Motion was granted the deposition had to be taken in Las Vegas and then there was discussion as to a videoconference deposition. Mr. Blum advised he does not believe a videoconference deposition will work as it is a document intensive case and he would like the deposition to take place in Las Vegas. Mr. Flahive advised the Court previously approved a videoconference deposition. Court advised it is fair to depose the witness in person. Mr. Flahive noted this is putting an unnecessary financial burden on his client and advised his witness is available on July 25th and 26th. Mr. Blum reiterated he wants a same day transcript or a transcript in his hand before he walks into trial. Court advised it will require the witness to appear here in person. Due to his schedule, Mr. Flahive requested to vacate the trial date of July 24th. Mr. Blum had no objection. COURT ORDERED, trial date of July 24th VACATED. Colloquy regarding the logistics of the 30(b)(6) witness testifying. Mr. Blum requested to have Mr. Flahive speak with his witness so counsel can get on the same page regarding the witness being deposed and testifying. Once counsel is on the same page, they can have a conference call with the Court. Court so noted.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 16, 2019

A-15-729030-B	Meditex, LLC, Plaintiff(s) vs. Hamid Modjtahed, Defendant(s)
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July 16, 2019

1:30 PM

Bench Trial

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

Blum, Jonathan D.	Attorney
Flahive, Andrew Scott, ESQ	Attorney
Modjtahed, Hamid	Defendant
	Counter Claimant
Mojtahed, Mohammad	Defendant
	Counter Claimant
Safari, Parviz	Plaintiff
	Counter Defendant

JOURNAL ENTRIES

- Ladan Dillon, Farsi Interpreter, present.

Due to the availability of the Court, COURT ORDERED, trial date of July 30, 2019 VACATED. Court noted it can start trial early on Thursday morning at 10:30 am. Mr. Blum advised he will check with his witness to see if he can appear earlier in the day. Testimony and exhibits presented (see worksheets). COURT FURTHER ORDERED, trial CONTINUED.

CONTINUED TO: 7/17/19 1:30 PM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 17, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

July 17, 2019 1:30 PM Bench Trial

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Ladan Dillon, Farsi Interpreter, present.

Mr. Blum confirmed his witness is available to proceed tomorrow at 10:30 am. Court so noted. Mr. Flahive added the Yusen deposition can take place on July 30th with testimony to follow on July 31st. Testimony and exhibits presented (see worksheets). COURT ORDERED, trial CONTINUED.

CONTINUED TO: 7/18/19 10:30 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****July 18, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

July 18, 2019 10:30 AM Bench Trial

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Testimony and exhibits presented (see worksheets). Mr. Blum advised the Yusen deposition will take place on the 30th with testimony to follow on the 31st. Upon Court's inquiry, counsel confirmed the 25th, 26th and 29th could be vacated with trial to resume on the 31st; COURT SO ORDERED. Mr. Blum requested to resume trial at 1:30 pm on the 31st. Mr. Flahive had no objection. Court noted it only has the afternoons of August 1st and 2nd to finish trial. Counsel advised they would contact the Court's Judicial Executive Assistant to coordinate scheduling dates for closing arguments. COURT ORDERED, trial CONTINUED.

CONTINUED TO: 7/31/19 1:30 PM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****July 31, 2019**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

July 31, 2019 1:30 PM Bench Trial

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Mr. Blum advised Mr. Flahive is calling his last witness today and he has one rebuttal witness for their case that will go tomorrow with an interpreter. Mr. Blum requested to schedule an additional trial date for closing arguments. Colloquy regarding scheduling and availability. COURT ORDERED, additional trial dates SET on August 1, 2019 at 1:30 pm and August 7, 2019 at 9:30 am. Testimony and exhibits presented (see worksheets). Mr. Flahive made an oral motion to have the pleadings conformed to reflect the evidence. Mr. Flahive requested to add claims of breach of covenant of good faith and fair dealing and unjust enrichment. Argument in opposition by Mr. Blum. Court noted it seems unjust enrichment can correspond with accounting. COURT FURTHER ORDERED, oral motion GRANTED IN PART relative to deeming the complaint to include a claim for unjust enrichment and DENIED as it seeks to plead breach of the implied covenant of good faith and fair dealing. COURT ORDERED, trial CONTINUED.

CONTINUED TO: 8/1/19 1:30 PM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

August 01, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

August 01, 2019 1:30 PM Bench Trial

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Kerry Esparza

REPORTER:

PARTIES

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Ladan Dillon, Farsi Interpreter, present.

Testimony and exhibits presented (see worksheets). Defense RESTED. COURT ORDERED, trial CONTINUED.

CONTINUED TO: 8/7/19 9:30 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

August 07, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

August 07, 2019 9:30 AM Bench Trial

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Ali	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Defendant
		Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Court noted the evidence is closed and now is the time for summation. Closing arguments by Mr. Flahive and Mr. Blum. Court directed each side to submit proposed findings of fact and conclusions of law and proposed judgment to the Court by close of business September 13, 2019. COURT ORDERED, decision UNDER ADVISEMENT as of September 16, 2019.

CLERK'S NOTE: Per direction of counsel via email, all unadmitted exhibits are to be destroyed. Original transcripts not published have been returned to counsel. /mk 8/8/19

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

November 18, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

November 18, 2019 9:00 AM Motion

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- No appearance. COURT ORDERED, matter CONTINUED pursuant to stipulation and order.

CONTINUED TO: 12/5/19 9:00 AM

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

December 05, 2019

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

December 05, 2019 9:00 AM All Pending Motions

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
 Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- PLAINTIFFS' MOTION FOR RECONSIDERATION OR AMENDMENT OF JUDGMENT...DEFENDANTS/ COUNTER-CLAIMANTS' HAMID MODJTAHED AND MOHAMMED MOJTAHED'S MOTION FOR PUNITIVE DAMAGES...DEFENDANTS/ COUNTERCLAIMANTS' HAMID MODJTAHED AND MOHAMMED MOJTAHED'S MOTION FOR ATTORNEY'S FEES

Arguments by Mr. Flahive and Mr. Blum as to Plaintiffs' Motion for Reconsideration or Amendment of Judgment. Court advised the record will so reflect there is no double recovery. Arguments by Mr. Blum and Mr. Flahive regarding the Motion for Punitive Damages. Court advised it will set a half day phase two of trial relative to punitive damages; trial order to issue. Court noted trial will be sometime after the beginning of the new year. As to the Motion for Attorney's Fees, Court considered the Motion to be ripe as it is a claim for fees based on the offer of judgment and the contractual provision. Following arguments by Mr. Blum and Mr. Flahive, COURT ORDERED, Defendants/ Counterclaimants' Hamid Modjtahed and Mohammed Mojtahead's Motion for Attorney's Fees UNDER ADVISEMENT as to the amount.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

February 03, 2020

A-15-729030-B	Meditex, LLC, Plaintiff(s)
	vs.
	Hamid Modjtahed, Defendant(s)

February 03, 2020 9:00 AM Motion for Clarification

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney

JOURNAL ENTRIES

- Mr. Flahive advised he had no opposition as Mr. Blum is just seeking clarification. Mr. Blum advised costs were not addressed in the Decision, there was a request for costs, and inquired if he can include costs in the order. Court confirmed Mr. Blum could include them. There being no opposition, COURT ORDERED, Motion for Clarification Regarding December 19, 2019 Decision with Regard to Costs GRANTED. Mr. Blum inquired about scheduling the next phase of the case and advised it will only take a half day. Court advised it will set the case on a bench stack.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

March 02, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

March 02, 2020 2:00 PM Calendar Call

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Counsel estimated a half day for the punitive damages phase of trial and provided their availability to the Court. MATTER TRAILED.

MATTER RECALLED. COURT ORDERED, trial date SET for April 1, 2020 at 9:00 am with Pre-Trial Memoranda DUE by close of business on March 27, 2020.

4/1/20 9:00 AM NON-JURY TRIAL

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

March 19, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

March 19, 2020 2:00 PM Minute Order

HEARD BY: Denton, Mark R. **COURTROOM:** Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Due to restrictions that have recently been imposed by the Judicial and Executive branches of Nevada's state government, the trial set on April 1, 2020 is vacated. A separate trial order will be issued resetting the trial on the July 7, 2020 stack.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 3/19/20

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 24, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

June 24, 2020

2:00 PM

Minute Order

HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

PARTIES

PRESENT:

JOURNAL ENTRIES

- Until further notice, Department 13 will be conducting court hearings REMOTELY using the BlueJeans Video Conferencing system. Department 13 has adopted this policy as a precautionary measure in light of public health concerns for Coronavirus COVID-19, and the Court orders that any party intending to appear before Department 13 for law and motion matters do so by BlueJeans only. As a result, your matter scheduled June 29, 2020 in this case will be conducted via BlueJeans. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715

Meeting ID: 823 435 758

URL: bluejeans.com/823435758

To connect by phone, dial the number provided and enter the meeting ID followed by #.

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the BlueJeans app and join the meeting by entering the meeting ID.

PLEASE NOTE the following protocol each participant will be required to follow:

You will be automatically muted upon entry to the meeting. Please remain muted while waiting for your matter to be called. If you are connecting by phone, you can mute/unmute yourself on your phone or by pressing *4.

Do NOT place the call on hold since some phones may play wait/hold music.

Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the BlueJeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 6/24/20

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

June 29, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

June 29, 2020 2:00 PM Calendar Call

HEARD BY: Denton, Mark R. **COURTROOM:** RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
 Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Counsel present via BlueJeans.

Counsel confirmed trial will last one day for the punitive damages phase and provided their availability to the Court. Colloquy regarding handling trial via BlueJeans and the necessity of an interpreter. MATTER TRAILED.

MATTER RECALLED. COURT ORDERED, trial date SET for July 15, 2020 at 9:00 am with Pre-Trial Memoranda or supplements thereto DUE by close of business July 13, 2020.

7/15/20 9:00 AM NON-JURY TRIAL

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

July 08, 2020

A-15-729030-B	Meditex, LLC, Plaintiff(s)
	vs.
	Hamid Modjtahed, Defendant(s)

July 08, 2020	10:00 AM	Minute Order
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HEARD BY: Denton, Mark R.	COURTROOM: Chambers
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COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- In accordance with AO-17, Department 13 will be conducting Non-Jury Trial in this case REMOTELY using the BlueJeans Video Conferencing system. Counsel/ Parties in proper person and witnesses are to appear only by video conferencing and not by telephone. In person appearances by witnesses and counsel/parties in proper person will be permitted only by stipulation of all parties. A notary is NOT required to be present with the witness if the witness is testifying via video conferencing. If for some reason a witness can only appear telephonically, please notify the department immediately as a notary will be required.

The following URL and meeting ID will be used for the entire length of the trial. Please distribute this information to your witnesses as this is the information they will need in order to testify.

Meeting ID: 856 396 840
URL: bluejeans.com/856396840

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

You may also download the BlueJeans app and join the meeting by entering the meeting ID.

You are encouraged to visit bluejeans.com to familiarize yourself with the BlueJeans system before trial.

PLEASE NOTE the following protocol for trial:

Please mute yourself when you are not speaking. During examination of a witness, both the witness and person examining can be unmuted in order to prevent delays.

Counsel/ Parties in proper person are required to provide witnesses copies of all exhibits they intend to introduce through the witness. If counsel/ parties in proper person intend to cross-examine a witness with a document or documents, they must provide copies to the witness before cross-examination begins. For ease of reference, ALL exhibits must contain Bates numbers that must be read into the record when discussing the document. If the exhibits are emailed to the witness, these exhibits need to be accessible on a device separate from the device the witness will be using for BlueJeans.

It is incumbent on counsel/parties in proper person to provide the above BlueJeans meeting information to their witnesses before the start of trial. We recommend counsel/parties in proper person test with their witnesses at least 24 hours in advance of their testimony to address any technical issues there may be.

Counsel/ Parties in proper person will be contacted by Chambers to set up a BlueJeans test that will occur the day before trial or a time otherwise agreed to.

All exhibits provided to the Court will be handled electronically through Courtroom Clerk Supervisor, Michelle Jones. You will be contacted via email regarding this process. Please respond to these emails as soon as possible. If there are any questions regarding the electronic exhibit process you are to contact Michelle Jones at Jonesm@clarkcountycourts.us or Madalyn Kearney at kearney@clarkcountycourts.us.

CLERK'S NOTE: Minutes amended 7/8/20 at 10:45 am to reflect the correct BlueJeans meeting information. This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 7/8/20

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters**COURT MINUTES****July 15, 2020**

A-15-729030-B Meditex, LLC, Plaintiff(s)
 vs.
 Hamid Modjtahed, Defendant(s)

**July 15, 2020 9:00 AM Non-Jury Trial Court Finds for
 Defendant/
 Counterclaimant**

HEARD BY: Denton, Mark R.**COURTROOM:** RJC Courtroom 03D**COURT CLERK:** Madalyn Kearney**RECORDER:** Jennifer Gerold**REPORTER:****PARTIES**

PRESENT:	Blum, Jonathan D.	Attorney
	Flahive, Andrew Scott, ESQ	Attorney
	Modjtahed, Hamid	Defendant
		Counter Claimant
	Mojtahed, Mohammad	Counter Claimant
	Safari, Parviz	Plaintiff
		Counter Defendant

JOURNAL ENTRIES

- Parties present via BlueJeans Videoconferencing.

Colloquy regarding the medical letter received regarding Ms. Zahedi's ability to testify and appear at trial. Opening statements by Mr. Blum and Mr. Flahive. Testimony and exhibits presented (see worksheets). Closing arguments by Mr. Blum and Mr. Flahive. COURT ORDERED, decision UNDER ADVISEMENT.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

August 03, 2020

A-15-729030-B	Meditex, LLC, Plaintiff(s) vs. Hamid Modjtahed, Defendant(s)
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August 03, 2020	1:30 PM	Minute Order
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HEARD BY: Denton, Mark R.	COURTROOM: Chambers
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COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- HAVING further reviewed and considered the evidence, arguments of counsel, and the record herein pertaining to the second phase of trial regarding punitive/exemplary damages conducted on July 15, 2020 after which the matter was taken under advisement, and being fully advised in the premises, and determining that punitive/exemplary damages are warranted in the amounts set forth below given the applicable standards, the Court makes the following awards of such damages to Defendants/Counterclaimants:

\$810,950.00 as against Plaintiff/Counterdefendant Parviz Safari
\$223,350.00 as against Plaintiff/Counterdefendant Mandana Zahedi
\$183,400.00 as against Counterdefendant Nooshin Zahedi

Counsel for Defendants/Counterclaimants is directed to submit proposed findings of fact, conclusions of law, and a proposed judgment consistent herewith. Such items are to be submitted to Plaintiffs/Counterdefendants counsel for review and signification of approval/disapproval. Instead of seeking to clarify or litigate meaning or any disapproval through correspondence directed to the Court or to counsel with copies to the Court, any such clarification or disapproval should be the subject of appropriate motion practice.

IT IS SO ORDERED.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 8/3/20

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

August 04, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

August 04, 2020 1:00 PM Minute Order

HEARD BY: Denton, Mark R. **COURTROOM:** Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Until further notice, Department 13 will be conducting court hearings REMOTELY using the BlueJeans Video Conferencing system. Department 13 has adopted this policy as a precautionary measure in light of public health concerns for Coronavirus COVID-19, and the Court orders that any party intending to appear before Department 13 for law and motion matters do so by BlueJeans only. As a result, your matter scheduled August 6, 2020 in this case will be conducted via BlueJeans. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715
Meeting ID: 668 571 876
URL: bluejeans.com/668571876

To connect by phone, dial the number provided and enter the meeting ID followed by #.

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

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Please do NOT use speaker phone as it causes a loud echo/ringing noise.

Please state your name each time you speak so that the court recorder can capture a clear record.

Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the [Bluejeans.com](https://bluejeans.com) website to get familiar with the BlueJeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 8/4/20

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

August 06, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

**August 06, 2020 9:00 AM Motion to Withdraw as
Counsel**

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Trisha Garcia

REPORTER:

PARTIES

PRESENT: Flahive, Andrew Scott, ESQ Attorney

JOURNAL ENTRIES

- Ryan Peterson, Esq. present for Defendant. Counsel present via BlueJeans.

Court noted it has received no opposition. Mr. Flahive confirmed there is no opposition and advised he still wants to stay on as counsel to review the order regarding the Court's punitive damages decision. COURT ORDERED, Plaintiff/ Counter-Defendants' Motion to Withdraw as Attorney of Record GRANTED. Court directed Mr. Flahive to submit the order on the Motion to Withdraw after the order regarding punitive damages has been submitted. Mr. Peterson noted he had no opposition to the order for punitive damages being processed before the order on the Motion to Withdraw.

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

November 19, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

November 19, 2020 1:00 PM Minute Order

HEARD BY: Denton, Mark R.

COURTROOM: Chambers

COURT CLERK: Madalyn Kearney

RECORDER:

REPORTER:

**PARTIES
PRESENT:**

JOURNAL ENTRIES

- Until further notice, Department 13 will be conducting court hearings REMOTELY using the BlueJeans Video Conferencing system. Department 13 has adopted this policy as a precautionary measure in light of public health concerns for Coronavirus COVID-19, and the Court orders that any party intending to appear before Department 13 for law and motion matters do so by BlueJeans only. As a result, your matter scheduled November 23, 2020 in this case will be conducted via BlueJeans. You have the choice to appear either by phone or computer/video.

Dial the following number: 1-408-419-1715

Meeting ID: 944 156 346

URL: [bluejeans.com/ 944156346](https://bluejeans.com/944156346)

To connect by phone, dial the number provided and enter the meeting ID followed by #.

To connect by computer if you do NOT have the app, copy the URL link into a web browser. Google Chrome is preferred but not required. Once you are on the BlueJeans website click on Join with Browser which is located on the bottom of the page. Follow the instructions and prompts given by BlueJeans.

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Please be mindful of rustling papers, background noise, and coughing or loud breathing.

Please be mindful of where your camera is pointing.

We encourage you to visit the Bluejeans.com website to get familiar with the BlueJeans phone/videoconferencing system before your hearing.

If your hearing gets continued to a different date after you have already received this minute order please note a new minute order will issue with a different meeting ID since the ID number changes with each meeting/hearing.

Please be patient if you call in and we are in the middle of oral argument from a previous case. Your case should be called shortly. Again, please keep your phone or computer mic on MUTE until your case is called.

CLERK'S NOTE: This Minute Order was electronically served by Courtroom Clerk, Madalyn Kearney, to all registered parties for Odyssey File & Serve. /mk 11/19/20

**DISTRICT COURT
CLARK COUNTY, NEVADA**

Other Business Court Matters

COURT MINUTES

November 23, 2020

A-15-729030-B Meditex, LLC, Plaintiff(s)
vs.
Hamid Modjtahed, Defendant(s)

November 23, 2020 9:00 AM Motion

HEARD BY: Denton, Mark R.

COURTROOM: RJC Courtroom 03D

COURT CLERK: Madalyn Kearney

RECORDER: Jennifer Gerold

REPORTER:

PARTIES

PRESENT: Blum, Jonathan D. Attorney
 Stewart, Thomas W, Attorney

JOURNAL ENTRIES

- Counsel present via BlueJeans.

Following arguments by Mr. Stewart and Mr. Blum, COURT ORDERED, Motion to Alter or Amend the Judgement and for New Trial DENIED. Mr. Blum to prepare the order. Mr. Blum noted they requested fees and costs. Court advised it will not add more fees and leave it as is.

JOINT PRE-TRIAL EXHIBIT LIST

CASE NO.: A-15-729030-B

TRIAL DATE: May 21, 2019

DEPT. NO.: XIII

JUDGE: Hon. Mark R. Denton

CLERK: Madalyn Kearney

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,

REPORTER: Jennifer Gerold

Plaintiffs,

ANDREW S. FLAHERTY, ESQ.
COUNSEL FOR PLAINTIFFS

vs.

HAMID MODJTAHED, an individual, and
MOHAMMAD MOJTAHED, an individual

JONATHAN D. BLUM, ESQ.
SCOTT D. FLEMING, ESQ.
COUNSEL FOR DEFENDANTS

Defendants, et al.

Ex. #	Document	Bate No.	Offered		Admitted	
			Date	OBJ	Date	
J-1 wy	Outgoing Wire Transfer Request (Holman's Depo Ex. 47 & Nooshin Zahedi Depo Ex. 12)	MEDITEX000330 - MEDITEX000331	5/23/19	no	5/23/19	
J-2 wy	NutraLab Sales Confirmation, August 19, 2015	MEDITEX000386 - MEDITEX000387				
J-3 wy	Emails	MEDITEX000392 - MEDITEX000401				
J-4 wy	Wire Transfer Combined Disclosure and Receipt, September 10, 2015	MEDITEX000402				

KOLESA LEATHAM
400 S. Rampart Boulevard, Suite 400
Las Vegas, Nevada 89145
Tel: (702) 362-7800 / Fax: (702) 362-9472

KOLESA LEATHAM

400 S. Rampart Boulevard, Suite 400
Las Vegas, Nevada 89145
Tel: (702) 362-7800 / Fax: (702) 362-9472

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-5 w	Email Regarding Sales Documents	MEDITEX000403		5/23/19		no	5/23/19
J-6 w	Various Emails	MEDITEX000404 – MEDITEX000422					
J-7 w	Various Emails	MEDITEX000423 – MEDITEX000433					
J-8 w	NV SOS Entity Details for SCBA Sales and Rentals LLC	MEDITEX000434 – MEDITEX000435					
J-9 w	NutraLab Cancellation Order, 4/25/16	MEDITEX000436					
J-10 w	NutraLab Cancellation Order, 4/25/16	MEDITEX000437 – MEDITEX000439					
J-11 w	07/09/13 Email from A Safari to M Mojtahed re. Price	MEDITEX001674					

KOLESA LEATHAM

400 S. Rampart Boulevard, Suite 400

Las Vegas, Nevada 89145

Tel: (702) 362-7800 / Fax: (702) 362-9472

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-12 WA	Emails re. vitamin orders	MEDITEX001676 – MEDITEX001695		5/22/19		no	5/22/19
J-13 WA	Wells Fargo Bank Statements (Mandana Zahedi Depo Ex. 7, 11; and Nooshin Zahedi Depo. Ex. 8)	MEDITEX001704 – MEDITEX001715		5/23/19		no	5/23/19
J-14 WA	Wells Fargo Bank Statements (Mandana Zahedi Depo Ex. 9, 10 and Nooshin Zahedi Depo. Ex. 13)	MEDITEX001733- MEDITEX001747					
J-15 WA	Table of UT Safety Acct. 0660	MEDITEX001756 – MEDITEX001762					
J-16 WA	SCBA documents (Holman's Depo Ex. 1, 2, 3, 11, 15, 41, 16, 42, 19, 13, 20, 21, 44, 43, 22, 23, 34, 35)	MEDITEX001767 – MEDITEX001868					
J-17 WA	SCBA documents (Holman's Depo Ex. 1, 2, 3, 11, 15, 41, 16, 42, 19, 13, 20, 21, 44, 43, 22, 23, 34, 35)	MEDITEX001869 - MEDITEX001961					
J-18 WA	Custodian of Records Network Solutions LLC	MEDITEX001962		5/23/19		no	5/23/19

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-19 WA	Network Solutions Documents re scbaseleco.com (Holman's Depo Ex. 5; Mandana Zahedi Depo Ex. 13; and Nooshin	MEDITEX001964 – MEDITEX002015		5/23/19		no	5/23/19
J-20 WA	UT Safety P.O.	MEDITEX001807 – MEDITEX001808					
J-21 WA	06/16/14 emails between sales@scbarentalco.com and aidansafari@gmail.com re. AW Bill	MEDITEX001898					
J-22 WA	06/25/14 emails between sales@scbarentalco.com and aidansafari@gmail.com re. Hello	MEDITEX001900					
J-23 WA	Safari/Mojtahed/SCBA Emails	MEDITEX002016 – MEDITEX002019					
J-24 WA	Payments Email Dated 8-29-14 (Lorenz Depo Ex. MM)	MEDITEX002020					
J-25 WA	Email dated November 13, 2014 with attached Certificate and Safety Approval (Holman's Depo Ex. 40)	MEDITEX002021 – MEDITEX002022					

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-26 WA	Emails	MEDITEX002340 – MEDITEX002342	S/23/17	no	S/23/19
J-27 WA	Emails	MEDITEX002348			
J-28 WA	Emails	MEDITEX002349 – MEDITEX002350			
J-29 WA	Emails	MEDITEX002351 – MEDITEX002396			
J-30 WA	Emails (Lorenz's Depo Ex. OO)	MEDITEX002397 – MEDITEX002398			
J-31 WA	Emails	MEDITEX002399 – MEDITEX002401			
J-32 WA	Emails	MEDITEX002402			

				Offered			Admitted
				Date		OBJ	Date
Ex. #	Document	Bate No.					
J-33 wa	Emails	MEDITEX002405 – MEDITEX002407		5/23/19		NO	5/23/19
J-34 wa	December 2014 Meditex Financial Statements	MEDITEX002408 – MEDITEX002411					
J-35 wa	Supplement Purchase Expenses	MEDITEX002412 – MEDITEX002416					
J-36 wa	Bank Transaction Accounting	MEDITEX002417 – MEDITEX002434					
J-37 wa	Email dated 3/27/15 (Kellerman's Depo Ex. D)	MEDITEX002435					
J-38 wa	Email dated 3/31/15	MEDITEX002436					
J-39 wa	Emails	MEDITEX002437 – MEDITEX002438					

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-40 WA	Correspondence dated 10/2/15 re: Cease and Desist all Communications with Mr. Parviz Aidan Safari	MEDITEX002441 – MEDITEX002442		5/23/19		no	5/23/19
J-41 WA	NutraLab Sales Confirmation Invoice 10-01-13	MEDITEX002443 – MEDITEX002444					
J-42 WA	Emails	MEDITEX002448 – MEDITEX002459		5/23/19		no	5/23/19
J-43 WA	Meditex , LLC entity details – Nevada Secretary of State	MEDITEX002460 – MEDITEX002461		5/23/19		no	5/23/19
J-44 WA	MAPSA Contract signed by P. Safari and A Sharifi (Mandana Zahedi Depo Ex. 26)	MEDITEX002462 – MEDITEX002465					
J-45 WA	Emails	MEDITEX002473 – MEDITEX002477					
J-46 WA	Emails	MEDITEX002478 – MEDITEX002481					

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-47 WA	Transcription of audio clip from 2014 Meditex board meeting (Mandana Zahedi Depo Ex. 20 and Nooshin Zahedi Depo Ex. 15)	MEDITEX002484		5/23/19		no	5/23/19
J-48 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX002485 – MEDITEX002576					
J-49 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX002577 – MEDITEX002655					
J-50 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX002656 – MEDITEX002787					
J-51 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX002788 – MEDITEX002852					
J-52 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX002853 – MEDITEX003002					
J-53 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX003003 – MEDITEX003078					

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-54 WA	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q,	MEDITEX003079 – MEDITEX003230		5/23/19		10	5/23/19
J-55 WA	Eric Lorenz signed COR	MEDITEX003231					
J-56 WA	Transcription of audio clip from 2014 Meditex board meeting (Mandana Zahedi Depo Ex. 20)	MEDITEX003232 – MEDITEX003233					
J-57 WA	Wells Fargo Statements - Account '8082- UT Safety (Mandana Zahedi Depo Ex. 4 and Nooshin Zahedi Depo Ex. 7)	MEDITEX003235 – MEDITEX003274					
J-58 WA	Payments to Batool Zamanian 5/4/11- 5/13/11 (Mandana Zahedi Depo Ex. 27)	MEDITEX003275 – MEDITEX003276					
J-59 WA	Audio clips - voice mail (Nooshin Zahedi Depo Ex. 15)	MEDITEX003279 – MEDITEX003280					
J-60 WA	Email re: H2S Contract	MEDITEX003281 – MEDITEX003284					

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-61 WA	2/21/14 email re invoice PFMED01 with attachment	MEDITEX003299 – MEDITEX003301		5/23/19		no	5/23/19
J-62 WA	2014 board meeting audio	MEDITEX003302					
J-63 WA	Transcription of April 2014 Meditex board meeting (Mandana Zahedi Depo Ex. 19)	MEDITEX003311 – MEDITEX003319					
J-64 WA	Translation of audio voice mail	MEDITEX003320					
J-65 WA	Translation of Audio File from voicemail	MEDITEX003321 – MEDITEX003322					
J-66 WA	Meeting Transcription and Translation	MEDITEX003324 – MEDITEX003331					
J-67 WA	Emails	MEDITEX003332 – MEDITEX003337					

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-68 wa	Emails	MEDITEX003341 – MEDITEX003347		5/23/19		no	5/23/19
J-69 wa	Email	MEDITEX003387 – MEDITEX003390					
J-70 wa	Email re: Invoice 19890 from Never Late Printing	MEDITEX003396 – MEDITEX003397					
J-71 wa	Emails re: Never Late Printing LLC and Invoice	MEDITEX003407 – MEDITEX003409					
J-72 wa	Email re. Invoice 20848 from Never Late Printing LLC	MEDITEX003411 – MEDITEX003415					
J-73 wa	4/4/14 Email	MEDITEX003416					
J-74 wa	Email 9-20-13 re attached Meditex Prelim. Business Plan	MEDITEX003420 – MEDITEX003421					

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-75 WA	Email re. Sales Receipt 20906 from Never Late Printing LLC	MEDITEX003422 – MEDITEX003424		5/23/19		no	5/23/19
J-76 WA	Emails	MEDITEX003427 – MEDITEX003433					
J-77 WA	Never Late Printing, LLC Paid Invoice	MEDITEX003434					
J-78 WA	Emails	MEDITEX003435 – MEDITEX003436					
J-79 WA	Email re. Invoice 21641 from Never Late Printing LLC	MEDITEX003437 – MEDITEX003438					
J-80 WA	Email - 6/27/14	MEDITEX003442					
J-81 WA	Emails – 7/3/14	MEDITEX003443 – MEDITEX003449					

				Offered			Admitted
				Date		OBJ	Date
Ex. #	Document	Bate No.					
J-82 wa	Email – 10/12/14	MEDITEX003451		5/23/19		no	5/23/19
J-83 wa	Email – 10/15/14	MEDITEX003452 – MEDITEX003453					
J-84 wa	Email - 3/27/15	MEDITEX003454					
J-85 wa	Email – 5/14/15	MEDITEX003455 – MEDITEX003456					
J-86 wa	Email – 5/29/15	MEDITEX003457					
J-87 wa	Email – 6/19/15	MEDITEX003458					
J-88 wa	Email – 6/24/15	MEDITEX003459 – MEDITEX003464					

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				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-89 WA	Email – 7/10/15	MEDITEX003465 – MEDITEX003467		5/23/19		no	5/23/19
J-90 WA	Email 8/17/15	MEDITEX003469 – MEDITEX003472					
J-91 WA	Emails Various	MEDITEX003473 – MEDITEX003482					
J-92 WA	Email 9/2/15	MEDITEX003483 – MEDITEX003484					
J-93 WA	Business Plan – supplements	MEDITEX003485					
J-94 WA	Supplement Account 2014	MEDITEX003497					
J-95 WA	Pro Forma Invoice	MEDITEX003498					

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
J-96 WA	Documents Produced by JPMorgan Chase on May 5, 2017 in response to Subpoena Duces Tecum, including COR Record	MEDITEX003499 - MEDITEX003503	5/23/19	no	5/23/19
J-97 WA	Insufficient Funds Notices Account '1429	MEDITEX004186 - MEDITEX004197			
J-98 WA	Signature Card Acct. 9608	MEDITEX004211 - MEDITEX004212			
J-99 WA	Bank Statements	MEDITEX004221 - MEDITEX004224			
J-100 WA	Bank Statements	MEDITEX004248 - MEDITEX004261			
J-101 WA	Bank Statements	MEDITEX004278 - MEDITEX004286			
J-102 WA	Bank Statements	MEDITEX004317 - MEDITEX004340			

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Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-103 WA	Bank Statements	MEDITEX004426 – MEDITEX004487	5/23/19	no	5/23/19
J-104 WA	Bank Statements	MEDITEX004492 – MEDITEX004508			
J-105 WA	Bank Statements	MEDITEX004622			
J-106 WA	Bank Statements	MEDITEX004623 – MEDITEX004648			
J-107 WA	Bank Statements	MEDITEX004631			
J-108 WA	Bank Statements	MEDITEX004827 – MEDITEX004830			
J-109 WA	Bank Personal Signature Card	MEDITEX004847 – MEDITEX004848			

				Offered			Admitted
Ex. #	Document	Bate No.		Date		OBJ	Date
J-110 WA	Bank Check	MEDITEX004861		9/23/19		no	5/23/19
J-111 WA	Bank Check	MEDITEX004869					
J-112 WA	Bank Check	MEDITEX004871					
J-113 WA	Bank Check	MEDITEX004876					
J-114 WA	Bank Statements	MEDITEX004888 – MEDITEX004899					
J-115 WA	Bank Check	MEDITEX004913					
J-116 WA	Bank Statements	MEDITEX004917 – MEDITEX004934					

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-117 WA	Bank Statements	MEDITEX004999 – MEDITEX005004	5/23/19	no	5/23/19
J-118 WA	Bank Statements	MEDITEX005126 – MEDITEX005161			
J-119 WA	Bank Statements	MEDITEX005168 – MEDITEX005184			
J-120 WA	Bank Statements – Acct. 0919	MEDITEX005185 – MEDITEX005206			
J-121 WA	Bank Statements	MEDITEX005217			
J-122 WA	Bank Statements	MEDITEX005237 – MEDITEX005244			
J-123 WA	Bank Statements	MEDITEX005286 – MEDITEX005296			

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-124 WA	Bank Statements	MEDITEX005375 - MEDITEX005378	9/23/19	no	5/23/19
J-125 WA	Bank Records - Deposit	MEDITEX005379 - MEDITEX005380			
J-126 WA	Bank Records - Deposit	MEDITEX005381 - MEDITEX005382			
J-127 WA	Bank Records - Deposit	MEDITEX005407 - MEDITEX005408			
J-128 WA	Bank Documents	MEDITEX005460 - MEDITEX005472			
J-129 WA	Zahedi 2998 & 3478 Consumer Acct. App	MEDITEX005474 - MEDITEX005477			
J-130 WA	Bank Documents	MEDITEX005589 - MEDITEX005590			

				Offered			Admitted
				Date		OBJ	Date
Ex. #	Document	Bate No.					
J-131 WA	Bank Documents	MEDITEX005595 - MEDITEX005602		5/23/19		h0	5/23/19
J-132 WA	Deposit Slip #8409	MEDITEX005642					
J-133 WA	Deposit Slip #8409	MEDITEX005644					
J-134 WA	Deposit Slip #8409	MEDITEX005646					
J-135 WA	Deposit Slip #8409	MEDITEX005648					
J-136 WA	Deposit Slip #2998	MEDITEX005649 - MEDITEX005650					
J-137 WA	Signature Cards	MEDITEX005659 - MEDITEX005661					

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-138 WA	Bank Statements	MEDITEX005807 - MEDITEX005810	5/23/19	ho	5/23/19
J-139 WA	Bank Statements	MEDITEX005822 - MEDITEX005825			
J-140 WA	Bank Statements	MEDITEX005843 - MEDITEX005858			
J-141 WA	Wells Fargo Bank Statements for Acct. '0477 (Mandana Zahedi Depo Ex. 6)	MEDITEX005951 - MEDITEX005954			
J-142 WA	Statements Acct #8409 January-February 2012	MEDITEX006446 - MEDITEX006448			
J-143 WA	Statements Acct #8409 February-March 2012	MEDITEX006452 - MEDITEX006455			
J-144 WA	Statements Acct #8409 March-April 2012	MEDITEX006456 - MEDITEX006458			

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-145 WA	Statements Acct #8409 December-January 2013	MEDITEX006487 - MEDITEX006489	5/22/19	no	5/23/19
J-146 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000006 - GSP000056	5/23/19	no	5/23/19
J-147 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000057 - GSP000061	5/22/19	no	5/22/19
J-148 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000062 - GSP000063	5/22/19	no	5/22/19
J-149 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000064	5/22/19	no	5/22/19
J-150 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000065 - GSP000067	5/23/19	no	5/23/19
J-151 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000068 - GSP000070	5/22/19	no	5/22/19

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
J-152 WA	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase orders, related shipping	GSP000071 – GSP000076	5/22/19	no	5/22/19
J-153 WA	SCBA Invoice #09986	ASD000082	5/23/19	no	5/23/19
J-154 WA	Email	ASD000244			
J-155 WA	9/11/15 Email Communications from H. Mojtahed to Aidan re "Sales Invoice for Outstanding Balance"	ASD000274			
J-156 WA	9/15/15 Customs Export hold email from Bill Carter Yusen	ASD000280 – ASD000287			
J-157 WA	Meditex Accounting Docs 2015	ASD000288 – ASD000289			
J-158 WA	JPMorgan Chase Bank Wire Transfers	ASD000297 – ASD000302			

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				Offered Date	OBJ	Admitted Date
Ex. #	Document	Bate No.				
J-159 WA	Email	ASD000364		5/23/19	no	5/23/19
J-160 WA	Email re 3-month report 12-15-11	ASD000411				
J-161 WA	GSP Supplement Order Status 2013	ASD000433				
J-162 WA	Emails	ASD000437 – ASD000438				
J-163 WA	Air Waybill	ASD000442				
J-164 WA	Email 7-18-14	ASD000700				
J-165 WA	Checks and deposit slips relating to UTSafety (Nooshin Zahedi Depo Ex. 10)	ASD000999 – ASD001000				

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				Offered Date		OBJ	Admitted Date
Ex. #	Document	Bate No.					
J-166 wr	Checks and deposit slips relating to UTSafety (Nooshin Zahedi Depo Ex. 10)	ASD001003		5/23/19		h0	5/23/19
J-167 wa	Signature card Account '4310	ASD004310					
J-168 wz	11/28/12 Chase Statement – Safari '9608	ASD004524 – ASD004527					
J-169 wm	12/10/12 Deposit	ASD004531 – ASD004532					
J-170 wz	12/13/12 Deposit	ASD004533 – ASD004534					
J-171 wm	Copy of check from Meditex's account to Parvis Safari (Mandana Zahedi Depo Ex. 23)	ASD004878					
J-172 wr	Copies of checks to Parvis Safari (Mandana Zahedi Depo Ex. 22)	ASD004895 – ASD004896					

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
J-173 WA	Signature page for SCBA Chase Account	ASD005626 – ASD005628	5/23/19	NO	5/23/19
J-174 WA	Chase Deposit Slip 12-10-12	ASD009790			
J-175 WA	Chase Deposit Slip 12-13-12	ASD009792			
J-176 WA	Banking Records	ASD010073 – ASD010174			
J-177 WA	Banking Records	ASD010087 – ASD010088			
J-178 WA	Banking Records	ASD010594 – ASD0010603			

EXHIBIT(S) LIST

Case No.: **A729030**

Trial Date: **5/21/19**

Dept. No.: **XIII**

Judge: **Mark Denton**

Court Clerk: **Madalyn Kearney/ LORNA Shell**

PLAINTIFF'S: **Meditex, LLC**

Recorder: **Jennifer Gerold**

Counsel for Plaintiff: **Andrew Flahive**

vs.

DEFENDANT'S: **Hamid Modjtahed**

Counsel for Defendant: **Jonathan Blum**

TRIAL BEFORE THE COURT

PLAINTIFF'S EXHIBITS

all unadmitted exhibits destroyed

Exhibit Number	Exhibit Description	Date Offered	Objection	Date Admitted
1	Meditex Bank Statements with JP Morgan Chase for 2011 and 2012			
2	Meditex Bank Statements with JP Morgan Chase for 2013			
3	Meditex Bank Statements with JP Morgan Chase for 2014	5/23/19	no	5/23/19 (P)
4	Meditex Bank Statements with JP Morgan Chase for 2015			
5	Various Order/Shipping Forms Including Meditex Commercial Invoice Dated January 9, 2014			- see 5a-5c
6	Various Order/Shipping Forms Including Meditex Commercial Invoice March 14, 2014 (ASD 383 Only)	6/21/19	No	6/21/19 - see 6a-6c
7	Various Order/Shipping Forms Including Meditex Commercial Invoice Dated June 18, 2014			- see 7a-7d
8	Various Order/Shipping Forms Including Meditex Commercial Invoice Dated June 26, 2014			- see 8a-8d
9	Various Order/Shipping Forms Including Meditex Commercial Invoice Dated July 20, 2014			- see 9a-9c
10	Various Order/Shipping Forms Including Meditex Commercial Invoice Dated July 16, 2014			- see 10a-10d
11	Various Order/Shipping Forms Including Meditex Commercial Invoice Dated Sept 4, 2014			- see 11a-11c
12	Various Order/Shipping Forms Including Meditex Commercial Invoice September 9, 2015			- see 12a-12f
13	Bank Wire Transfer Instructions	5/21/19	yes - in its entirety	- see 13a
14	14 October 10, 2013 email from Vahid Aghaei			
15	Various Meditex Proforma Invoice	5/23/19	yes	5/23/19

EXHIBIT(S) LIST

16	June 26, 2014, email from sales@scbarentalco.com				
17	Email from Aidan Safari to Hamid Mojtahed				
wa 18	email (retained for the record)				
Sa	exhibit 5 ASD000377	5/23/19	yes	5/23/19	wa
Sb	exhibit 5 ASD000376	7/31/19	no	7/31/19	wa
Sc	exhibit 5 ASD000378	7/31/19	no	7/31/19	wa
6a	exhibit 6 ASD000382	5/23/19	yes	5/23/19	wa
6b	exhibit 6 ASD000381	7/31/19	no	7/31/19	wa
6c	exhibit 6 ASD000380	7/31/19	no	7/31/19	wa
7a	exhibit 7 ASD000388	5/23/19	yes	5/23/19	wa
7b	exhibit 7 ASD000387	7/31/19	no	7/31/19	wa
7c	exhibit 7 ASD000389	7/31/19	no	7/31/19	wa
7d	exhibit 7 ASD000391	7/31/19	no	7/31/19	wa
8a	exhibit 8 ASD000393	5/23/19	yes	5/23/19	wa
8b	exhibit 8 ASD000392	7/31/19	no	7/31/19	wa
8c	exhibit 8 ASD000394	7/31/19	no	7/31/19	wa
8d	exhibit 8 ASD000395	7/31/19	no	7/31/19	wa
9a	exhibit 9 ASD000397	5/23/19	yes	5/23/19	wa
9b	exhibit 9 ASD000396	7/31/19	no	7/31/19	wa
9c	exhibit 9 ASD000398	7/31/19	no	7/31/19	wa
10a	exhibit 10 ASD000400	5/23/19	yes	5/23/19	wa
10b	exhibit 10 ASD000399	7/31/19	no	7/31/19	wa
10c	exhibit 10 ASD000401	7/31/19	no	7/31/19	wa
10d	exhibit 10 ASD000402	7/31/19	no	7/31/19	wa
11a	exhibit 11 ASD000404	5/23/19	yes	5/23/19	wa
11b	exhibit 11 ASD000403	7/31/19	no	7/31/19	wa
11c	exhibit 11 ASD000405	7/31/19	no	7/31/19	wa
12a	exhibit 12 ASD011856	5/23/19	yes	5/23/19	wa
12b	exhibit 12 ASD011854	7/31/19	no	7/31/19	wa
12c	exhibit 12 ASD011855	7/31/19	yes	7/31/19	wa
12d	exhibit 12 ASD011861	7/31/19	no	7/31/19	wa

EXHIBIT(S) LIST

[illegible]

DEFENDANTS/COUNTER-CLAIMANTS' PRE-TRIAL EXHIBIT LIST

CASE NO.: A-15-729030-B

TRIAL DATE: May 21, 2019

DEPT. NO.: XIII

JUDGE: Hon. Mark R. Denton

CLERK: Madalyn Kearney/*LORNA Shell*

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,

REPORTER: Jennifer Gerold

Plaintiffs,

ANDREW S. FLAHIVE, ESQ.
COUNSEL FOR PLAINTIFFS

vs.

HAMID MODJTAHED, an individual, and
MOHAMMAD MOJTAHED, an individual

JONATHAN D. BLUM, ESQ.
SCOTT D. FLEMING, ESQ.
COUNSEL FOR DEFENDANTS

Defendants, et al.

all unadmitted exhibits destroyed
mk

			Offered		Admitted
			Date	OBJ.	Date
Ex. #	Document	Bate No.			
600	Meditex, LLC documents filed with NV Secretary of State	MEDITEX000001 – MEDITEX000008			
601	Email from A. Safari to H. Mojtahed re SCBA (new vendor)	MEDITEX000105			
602	SCBA Invoice	MEDITEX000134			

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RG

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Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
603	Emails re SCBA with attached 4/23/13 invoice and wire transfer information (Nooshin Zahedi Depo Ex. 6 &	MEDITEX000135 – MEDITEX000139	6/13/19	yes	6/13/19
604	Outgoing wire transfers from Meditex Account to UTSafety or SCBA Sale and Rental; related invoices and bank	MEDITEX000140 – MEDITEX000156	6/13/19	yes	6/13/19
605	Emails and attached quote (Holman's Depo Ex. 24)	MEDITEX000157 – MEDITEX000165	6/13/19	yes	6/13/19
606	Emails between SCBA Sales/Meditex (Holman's Depo. Exs. 17, 27, 28, 29, 30, 31 & 32)	MEDITEX000196 – MEDITEX000204	6/13/19	yes	6/13/19
607	Declaration of David Kellerman 8-19-16 (Kellerman's Depo Ex. B & C)	MEDITEX000237 – MEDITEX000251	6/13/19	no	6/13/19
608	Declaration of Kimburly J. Holman (Holman's Depo Ex. 7)	MEDITEX000252 – MEDITEX000262	6/13/19	yes	6/13/19
609	Articles of Organization, Limited-Liability Company, MEDITEX LLC	MEDITEX000263 – MEDITEX000278			

			Offered		Admitted	
			Date	OBJ	Date	
Ex. #	Document	Bate No.				
610	Board Member Agreement signed 3-14-13	MEDITEX000279	5/21/19	no	5/21/19	PS
611	Meditex, LLC Board Meeting Agreement statement dated April 15, 2014 (Holman's Depo Ex. 39)	MEDITEX000280 - MEDITEX000281	5/21/19	no	5/21/19	PS
612	Emails dated January 21, 2014, and January 27, 2014, from sales@scbasaleco.com to	MEDITEX000287 - MEDITEX000289	6/13/19	yes	6/13/19	PS
613	Email dated March 13, 2014, from sales@scbasaleco.com to aidansafari@meditexllc.	MEDITEX000290	6/13/19	yes	6/13/19	PS
614	Copies of Cancelled Checks from MEDITEX LLC	MEDITEX000291 - MEDITEX000296				PS
615	Email 4/4/14(Holman's Depo Ex. 38)	MEDITEX000297	6/13/19	yes	6/13/19	PS
616	Email 4/9/14	MEDITEX000298	6/13/19	yes	6/13/19	PS

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
617	Emails & SCBA Statement	MEDITEX000299 - MEDITEX000302	6/13/19	yes	6/13/19
618	06/18/14 sales@scbasaleco.com/ K Holman email to A Safari re. Statement (Nooshin Zahedi Depo Ex. 18)	MEDITEX000304	6/13/19	yes	6/13/19
619	Outgoing Wire Transfer Request (Holman's Depo Ex. 47 & Nooshin Zahedi Depo Ex. 12)	MEDITEX000330 - MEDITEX000331	6/13/19	yes	6/13/19
620	Emails from sales@scbasaleco.com to aidansafari@meditexllc. com, the first dated	MEDITEX000338 - MEDITEX000340	6/13/19	yes	6/13/19
621	Safari Email to Hamid, Regarding Payments	MEDITEX000379			
622	Invoice Las Vegas Metro Chamber of Commerce, March 26, 2015	MEDITEX000380			

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			Offered		Admitted
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Ex. #	Document	Bate No.			
623	NutraLab Sales Confirmation, August 19, 2015	MEDITEX000386 – MEDITEX000387			
624	Emails	MEDITEX000388 – MEDITEX000391			
625	Emails	MEDITEX000392 – MEDITEX000393			
626	Emails	MEDITEX000394 – MEDITEX000395			
627	Email	MEDITEX000399 – MEDITEX000401			
628	Wire Transfer Combined Disclosure and Receipt, September 10, 2015	MEDITEX000402			
629	Email Regarding Sales Documents	MEDITEX000403			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
630	Various Emails	MEDITEX000404 – MEDITEX000422			
631	Various Emails	MEDITEX000423 – MEDITEX000433			
632	NV SOS Entity Details for SCBA Sales and Rentals LLC	MEDITEX000434 – MEDITEX000435			
633	NutraLab Cancellation Order, 4/25/16	MEDITEX000436	5/22/19	no	5/22/19
634	NutraLab Cancellation Order, 4/25/16	MEDITEX000437 – MEDITEX000439			
635	Memo Regarding SCBA Shipment and Assembly (Holman's Depo Ex. 33)	MEDITEX000440 - MEDITEX000441	6/13/19	yes	6/13/19
636	Chase Record Certification	MEDITEX000442 - MEDITEX000445	6/12/19	yes	6/12/19

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Ex. #	Document	Bate No.	Offered		Admitted
			Date	OBJ	Date
637	Chase Bank Records - Account '1429 and - 4979 for Meditex LLC (Lorenz's Depo Exs. K, L, M, N, AA, BB, PP, SS; Mandana Zahedi Depo Ex. 5 & 16; Holman Ex. 48; and Kellerman Depo Ex. E) - GROUP 1	MEDITEX000447 - MEDITEX000550	6/12/19	yes	6/12/19
638	Chase Bank Records - Account '1429 and - 4979 for Meditex LLC (Lorenz's Depo Exs. K, L, M, N, AA, BB, PP, SS; Mandana Zahedi Depo Ex. 5 & 16; Holman Ex. 48; and Kellerman Depo Ex. E) - GROUP 2	MEDITEX000551 - MEDITEX000647	6/12/19	yes	6/12/19
639	Chase Bank Records - Account '1429 and - 4979 for Meditex LLC (Lorenz's Depo Exs. K, L, M, N, AA, BB, PP, SS; Mandana Zahedi Depo Ex. 5 & 16; Holman Ex. 48; and Kellerman Depo Ex. E) - GROUP 3	MEDITEX000648 - MEDITEX000756	5/22/19	no	5/22/19

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
640	Chase Bank Records - Account '1429 and - 4979 for Meditex LLC (Lorenz's Depo Exs. K, L, M, N, AA, BB, PP, SS; Mandana Zahedi Depo Ex. 5 & 16; Holman Ex. 48; and Kellerman Depo Ex. E) - GROUP 4	MEDITEX000757 - MEDITEX000850	5/22/19	no	5/22/19
641	Chase Bank Records - Account '1429 and - 4979 for Meditex LLC (Lorenz's Depo Exs. K, L, M, N, AA, BB, PP, SS; Mandana Zahedi Depo Ex. 5 & 16; Holman Ex. 48; and Kellerman Depo Ex. E) - GROUP 5	MEDITEX000851 - MEDITEX000918	5/22/19	no	5/22/19
642	Tax docs from Ovist & Howard - GROUP 1	MEDITEX000920 - MEDITEX001043	6/12/19	no	6/12/19

			Offered		Admitted	
			Date	OBJ	Date	
Ex. #	Document	Bate No.				
643	Tax docs from Ovist & Howard – GROUP 2	MEDITEX001044 – MEDITEX001161	6/12/19	no	6/12/19	MS
644	Tax docs from Ovist & Howard – GROUP 3	MEDITEX001162 – MEDITEX001304				MS
645	Tax docs from Ovist & Howard – GROUP 4	MEDITEX001305 – MEDITEX001434				MS
646	Tax docs from Ovist & Howard – GROUP 5	MEDITEX001435 – MEDITEX001549				MS
647	Tax docs from Ovist & Howard – GROUP 6	MEDITEX001550 – MEDITEX001673	6/12/19	no	6/12/19	MS
648	07/09/13 Email from A. Safari to M. Mojtahed re Price	MEDITEX001674	5/22/19	no	5/22/19	MS
649	Emails re: vitamin orders	MEDITEX001676 – MEDITEX001695	5/22/19	no	5/22/19	MS

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
650	Record Certification - Wells Fargo SDT	MEDITEX001696	6/13/19	yes	6/13/19
651	Copy of a check to Kim Holman dated May 2, 2014, in the amount of \$3,500 (Holman's Depo Ex. 50; Mandana Zahedi	MEDITEX001697	6/13/19	yes	6/13/19
652	UTSafety Wells Fargo bank account application (Mandana Zahedi Depo Ex. 8 and Nooshin Zahedi Depo Ex. 4)	MEDITEX001698 - MEDITEX001703	6/14/19	no	6/14/19
653	Wells Fargo Bank Statements (Mandana Zahedi Depo Ex. 7, 11; and Nooshin Zahedi Depo. Ex. 8)	MEDITEX001704 - MEDITEX001715			
654	Wells Fargo Bank Statements (Mandana Zahedi Depo Ex. 9, 10 and Nooshin Zahedi Depo. Ex. 13)	MEDITEX001733 - MEDITEX001747			
655	Table of UT Safety Acc. #0660	MEDITEX001756 - MEDITEX001762	6/14/19	no	6/14/19
656	Kim Holman Signed COR (Holman's Depo Ex. 10)	MEDITEX001763			

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Ex. #	Document	Bate No.	Offered		Admitted	
			Date	OBJ	Date	
657	Record Certification – SCBA	MEDITEX001763 – MEDITEX001766	6/11/19	no	6/11/19	129
658	SCBA documents (Holman's Depo Ex. 1, 2, 3, 11, 15, 41, 16, 42, 19, 13, 20, 21, 44, 43, 22, 23, 34, 35) – GROUP 1	MEDITEX001767 – MEDITEX001868	6/11/19	no	6/11/19	129
659	SCBA documents (Holman's Depo Ex. 1, 2, 3, 11, 15, 41, 16, 42, 19, 13, 20, 21, 44, 43, 22, 23, 34, 35) – GROUP 2	MEDITEX001869 – MEDITEX001961	6/11/19	no	6/11/19	129
660	UT Safety P.O.	MEDITEX001807 – MEDITEX001808				129
661	06/16/14 emails between sales@scbarentalco.com and aidansafari@gmail.com re. AW Bill	MEDITEX001898				129
662	06/25/14 emails between sales@scbarentalco.com and aidansafari@gmail.com re. Hello	MEDITEX001900				129

Ex. #	Document	Bate No.	Offered		Admitted	
			Date	OBJ	Date	
663	Custodian of Records Network Solutions LLC	MEDITEX001962	6/14/19	yes	6/14/19	MB
664	Network Solutions Documents re scbaseleco.com (Holman's Depo Ex. 5; Mandana Zahedi Depo	MEDITEX001964 – MEDITEX002015	6/14/19	yes	6/14/19	MB
665	Safari/Mojtahed Emails	MEDITEX002016 – MEDITEX002019				MB
666	Payments Email Dated 8-29-14 (Lorenz Depo Ex. MM)	MEDITEX002020				MB
667	Email dated November 13, 2014 with attached Certificate and Safety Approval (Holman's Depo Ex. 40)	MEDITEX002021 – MEDITEX002022	6/13/19	yes	6/13/19	MB
668	Email	MEDITEX002023	6/26/19	no	6/26/19	MB

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			Date	OBJ	Date
Ex. #	Document	Bate No.			
669	JP Morgan Subpoena Response - Chase Bank Statements, MEDITEX account #4797 (Lorenz's Depo Ex. SS and Mandana Zahedi Depo Ex. 17) #4797 (Lorenz's Depo Ex. SS and Mandana Zahedi Depo Ex. 17)	MEDITEX002024 - MEDITEX002085	6/12/19	yes	6/12/19
670	Bank Records	MEDITEX002045 - MEDITEX002048			
671	Bank Records	MEDITEX002067 - MEDITEX002070			
672	Record Certification - Chase SDT	MEDITEX002077 - MEDITEX002080	6/14/19	yes	6/14/19
673	Record Certification - Wells Fargo SDT	MEDITEX002086 - MEDITEX002088	6/14/19	yes	6/14/19
674	Wells Fargo business account application for UTSafety (Mandana Zahedi Depo Ex. 2, 3 and Nooshin Zahedi	MEDITEX002089 - MEDITEX002097	6/14/19	yes	6/14/19

Ex. #	Document	Bate No.	Offered		Admitted
			Date	OBJ	Date
675	Checks written from UTSafety Wells Fargo account ending in 8082 (Nooshin Zahedi Depo Ex. 9, 5)	MEDITEX002110 - MEDITEX002114	6/14/19	no	6/14/19
676	Business Account Application/Signature Cards for Accts. Ending in 0660 and 2836	MEDITEX002122 - MEDITEX002127			
677	Combined Statement of Accounts for Accts. Ending in 0660 and 2836 and miscellaneous bank documents re: same	MEDITEX002128 - MEDITEX002134			
678	Bank Documents for Accounts ending in 0660 and 2836	MEDITEX002135 - MEDITEX002145			
679	Bank Documents for Accounts ending in 0660 and 2836 Bank Documents for Accounts ending in 0660 and 2836	MEDITEX002146 - MEDITEX002150			
680	Bank Documents for Accounts ending in 0660 and 2836	MEDITEX002151 - MEDITEX002156	6/14/19	no	6/14/19

Ex. #	Document	Bate No.	Offered		Admitted
			Date	OBJ	Date
681	UTSafety Wells Fargo bank account statement, account ending in 0660 (Nooshin Zahedi Depo Ex. 11)	MEDITEX002157 – MEDITEX002165	6/14/19	h0	6/14/19
682	Bank Documents for Accounts ending in 0660 and 2836 Bank Documents for Accounts ending in 0660 and 2836	MEDITEX002172 – MEDITEX002192			
683	Bank Documents for Accounts ending in 0660 and 2836	MEDITEX002193			
684	Bank Documents for Accounts ending in 0660 and 2836 (Mandana Zahedi Depo Ex. 25 and Nooshin Zahedi Depo	MEDITEX002194 - MEDITEX002195			
685	Business Account Application/Signature Cards for Acct. ending in 1207	MEDITEX002198 - MEDITEX002203	6/14/19	h0	6/14/19
686	Record Certification - Ovist & Howard SDT (Lorenz's Depo Ex. B)	MEDITEX002213	6/12/19	h0	6/12/19

Ex. #	Document	Bate No.	Offered	OBJ	Admitted	
			Date		Date	
687	Payroll Tax Records (Lorenz's Depo Ex. KK, QQ, RR)	MEDITEX002214 - MEDITEX002320	6/12/19	NO	6/12/19	PR
688	Signed Operating Agreement of Meditex, LLC	MEDITEX002321 - MEDITEX002332	6/19/19	NO	6/19/19	PR
689	Payment notification 6/21/11	MEDITEX002333				MS
690	E-mail relating to Chase Bank account ending in 608 (Mandana Zahedi Depo Ex. 15)	MEDITEX002336 - MEDITEX002339	6/26/19	NO	6/26/19	MS
691	Emails	MEDITEX002340 - MEDITEX002342				MS
692	Meditex business documents filed with Nevada Secretary of State and U.S. Secretary of State	MEDITEX002343 - MEDITEX002346				MS
693	Emails	MEDITEX002348				MS

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			Date	OBJ	Date
Ex. #	Document	Bate No.			
694	Emails	MEDITEX002349 – MEDITEX002350			
695	Emails	MEDITEX002351 – MEDITEX002396			
696	Emails (Lorenz's Depo Ex. OO)	MEDITEX002397 – MEDITEX002398			
697	Emails	MEDITEX002399 – MEDITEX002401			
698	Emails	MEDITEX002402			
699	Emails	MEDITEX002405 – MEDITEX002407			
700	December 2014 Meditex Financial Statements	MEDITEX002408 – MEDITEX002411			

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Ex. #	Document	Bate No.	Offered	OBJ	Admitted
			Date		Date
701	Supplement Purchase Expenses	MEDITEX002412 – MEDITEX002416			
702	Bank Transaction Accounting	MEDITEX002417 – MEDITEX002434			
703	Email dated 3/27/15 (Kellerman's Depo Ex. D)	MEDITEX002435			
704	Email dated 3/31/15	MEDITEX002436			
705	Emails	MEDITEX002437 – MEDITEX002438			
706	Correspondence dated 10/2/15 re: Cease and Desist all Communications with Mr. Parviz Aidan Safari	MEDITEX002441 – MEDITEX002442	6/21/19	No	6/21/19
707	NutraLab Sales Confirmation Invoice 10-01-13	MEDITEX002443 – MEDITEX002444	5/22/19	No	5/22/19

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			Date	OBJ	Date
Ex. #	Document	Bate No.			
708	Emails	MEDITEX002448 – MEDITEX002459			
709	Meditex, LLC Eentity details – Nevada Secretary of State	MEDITEX002460 – MEDITEX002461			
710	MAPSA Contract signed by P. Safari and A. Sharifi (Mandana Zahedi Depo Ex. 26)	MEDITEX002462 – MEDITEX002465			
711	Emails	MEDITEX002473 – MEDITEX002477			
712	Emails	MEDITEX002478 – MEDITEX002481			
713	Audio Clip	MEDITEX002484			

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Ex. #	Document	Bate No.	Offered		Admitted
			Date	OBJ	Date
714	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 1	MEDITEX002485 – MEDITEX002576	6/12/19	no	6/12/19
715	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 2	MEDITEX002577 – MEDITEX002655			
716	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 3	MEDITEX002656 – MEDITEX002787	6/12/19	no	6/12/19

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			Date	OBJ	Date
Ex. #	Document	Bate No.			
717	Ovist & Howard Tax Docs, reproduced (MEDITEX000920- 1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 4	MEDITEX002788- MEDITEX002852	6/12/19	no	6/12/19
718	Ovist & Howard Tax Docs, reproduced (MEDITEX000920- 1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 5	MEDITEX002853 - MEDITEX003002	6/12/19	no	6/12/19

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			Date	OBJ	Date
Ex. #	Document	Bate No.			
719	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 6	MEDITEX003003 – MEDITEX003078	5/22/19	Y/S	5/22/19
720	Ovist & Howard Tax Docs, reproduced (MEDITEX000920-1673 previously) (Lorenz's Depo Ex. F, G, I, D, H, J, O, P, Q, R, S, T, U, V, W, X, Y, CC, DD, GG, HH, JJ, NN) GROUP 7	MEDITEX003079 – MEDITEX003230		no	
721	Eric Lorenz signed COR	MEDITEX003231		no	

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
722	Transcription of audio clip from 2014 Meditex board meeting (Mandana Zahedi Depo Ex. 20)	MEDITEX003232 - MEDITEX003233			
723	Record Certification - Wells Fargo SDT re acct. 8082	MEDITEX003234	6/14/19	no	6/14/19
724	Wells Fargo Statements - Account '8082 - UTSafety (Mandana Zahedi Depo Ex. 4 and Nooshin Zahedi Depo	MEDITEX003235 - MEDITEX003274	6/14/19	no	6/14/19
725	Payments to Batool Zamanian 5/4/11 - 5/13/11 (Mandana Zahedi Depo Ex. 27)	MEDITEX003275 - MEDITEXZ003276			
726	Initial funding of '1429 - 6/21/11	MEDITEX003277 - MEDITEX003278	6/27/19	yes	6/27/19
727	Audio clips - voice mail (Nooshin Zahedi Depo Ex. 15)	MEDITEX003279 - MEDITEX003280			
728	Email re: H2S Contract	MEDITEX003281 - MEDITEX003284			

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			Date	OBJ	Date
Ex. #	Document	Base No.			
729	2/21/14 email re invoice PFMED01 with attachment	MEDITEX003299 - MEDITEX003301			
730	2014 board meeting audio	MEDITEX003302			
731	2014 Tax Return Signature Authorization Form	MEDITEX003303	6/12/19	no	6/12/19
732	GSP Account Summary	MEDITEX003304 - MEDITEX003306			
733	NV Secretary of State Limited-Liability Company Fee Schedule effective 07/01/08 and revised 07/01/15	MEDITEX003307			
734	2011 Tax Return Signature Page	MEDITEX003308	6/12/19	no	6/12/19
735	2012 Tax Return Signature Page	MEDITEX003309	6/12/19	no	6/12/19

Ex. #	Document	Bate No.	Offered	OBJ	Admitted	
			Date		Date	
736	2013 Tax Return Signature Authorization Form	MEDITEX003310	6/12/19	no	6/12/19	mg
737	Transcription of April 2014 Meditex board meeting (Mandana Zahedi Depo Ex. 19)	MEDITEX003311 – MEDITEX003319				mg
738	Translation of audio voice mail	MEDITEX003320				mg
739	Translation of Safari's handwriting	MEDITEX003321 – MEDITEX003322				mg
740	Audio — Board Meeting	MEDITEX003323				mg
741	Meeting Transcription and Translation	MEDITEX003324 – MEDITEX003331				mg
742	Emails	MEDITEX003332 – MEDITEX003337				mg

Ex. #	Document	Bate No.	Offered	OBJ	Admitted
			Date		Date
743	Emails	MEDITEX003341 – MEDITEX003347			
744	Email	MEDITEX003387 – MEDITEX003390			
745	Email re: Invoice 19890 from Never Late Printing	MEDITEX003396 – MEDITEX003397			
746	Emails re: Never Late Printing LLC and Invoice	MEDITEX003407 – MEDITEX003409			
747	Email re. Invoice 20848 from Never Late Printing LLC	MEDITEX003411 – MEDITEX003415			
748	4/4/14 Email	MEDITEX003416			
749	Email 9-20-13 re attached Meditex Prelim. Business Plan	MEDITEX003420 – MEDITEX003421			

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Ex. #	Document	Bate No:			
750	Email re. Sales Receipt 20906 from Never Late Printing LLC	MEDITEX003422 – MEDITEX003424			
751	Emails	MEDITEX003427 – MEDITEX003433			
752	Never Late Printing, LLC Paid Invoice	MEDITEX003434			
753	Emails	MEDITEX003435 – MEDITEX003436			
754	Email re. Invoice 21641 from Never Late Printing LLC	MEDITEX003437 – MEDITEX003438			
755	Email - 6/27/14	MEDITEX003442			
756	Emails – 7/3/14	MEDITEX03443 – MEDITEX003449			

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Ex. #	Document	Bate No.	Date	OBJ	Date
757	Email – 10/12/14	MEDITEX003451			
758	Email – 10/15/14	MEDITEX003452 – MEDITEX003453			
759	Email - 3/27/15	MEDITEX003454			
760	Email – 5/14/15	MEDITEX003455 – MEDITEX003456			
761	Email – 5/29/15	MEDITEX003457			
762	Email – 6/19/15	MEDITEX003458			
763	Email – 6/24/15	MEDITEX003459 – MEDITEX003464			

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			Date	OBJ	Date
Ex. #	Document	Bate No.			
764	Email – 7/10/15	MEDITEX003465 – MEDITEX003467			
765	Email 8/17/15	MEDITEX003469 – MEDITEX003472			
766	Emails Various	MEDITEX003473 – MEDITEX003482			
767	Email 9/2/15	MEDITEX003483 – MEDITEX003484	6/26/19	no	6/26/19
768	Business Plan – supplements	MEDITEX003485			
769	Nevaco Ltd. Nevada Secretary of State Entity Details (Mandana Zahedi Depo Ex. 14)	MEDITEX003486 – MEDITEX003487			
770	Notice of establishment of Petro Arian Taebran Company, private joint stock (Mandana Zahedi Depo Ex. 1)	MEDITEX003491 – MEDITEX003493			

Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
771	Safari's Iran Companies 2 — continued	MEDITEX003494 - MEDITEX003496			
772	Supplement Account 2014	MEDITEX003497			
773	Pro Forma Invoice	MEDITEX003498			
774	Documents Produced by JPMorgan Chase on May 5, 2017 in response to Subpoena Duces Tecum, including COR	MEDITEX003499 - MEDITEX003503	6/12/19	yes	6/12/19
775	Insufficient Funds Notices Account '1429	MEDITEX004186 - MEDITEX004197	6/25/19	no	6/25/19
776	Signature Card Acct. 9608	MEDITEX004211 - MEDITEX004212	6/19/19	no	6/19/19
777	Bank Statements	MEDITEX004221- MEDITEX004224	6/25/19	no	6/25/19

			Offered		Admitted	
			Date	OBJ	Date	
Ex. #	Document	Bate No.				
778	Bank Statements	MEDITEX004248 – MEDITEX004261	6/25/19	no	6/25/19	h3
779	Bank Statements	MEDITEX004278 – MEDITEX004286				h3
780	Bank Statements	MEDITEX004317 – MEDITEX004340				h3
781	Bank Statements	MEDITEX004426 – MEDITEX004487				h3
782	Bank Statements	MEDITEX004492 – MEDITEX004508	6/25/19	no	6/25/19	h3
783	Bank Statements	MEDITEX004622	6/25/19	no	6/25/19	h3
784	Bank Statements	MEDITEX004623 – MEDITEX004648	6/14/19	no	6/14/19	h3

Ex. #	Document	Bate No.	Offered	OBJ	Admitted	
			Date		Date	
785	Bank Statements	MEDITEX004631	6/25/19	no	6/25/19	ng
786	Bank Statements	MEDITEX004827 - MEDITEX004830	6/25/19	no	6/25/19	ng
787	Bank Personal Signature Card	MEDITEX004847 - MEDITEX004848	6/19/19	no	6/19/19	ng
788	Bank Check	MEDITEX004861	6/25/19	no	6/25/19	ng
789	Bank Check	MEDITEX004869				ng
790	Bank Check	MEDITEX004871				ng
791	Bank Check	MEDITEX004876	6/25/19	no	6/25/19	ng

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
792	Bank Statements	MEDITEX004888 – MEDITEX004899	6/25/19	h0	6/25/19
793	Bank Check	MEDITEX004913			
794	Bank Statements	MEDITEX004917 – MEDITEX004934			
795	Bank Statements	MEDITEX004999 – MEDITEX005004			
796	Bank Statements	MEDITEX005126 – MEDITEX005161			
797	Bank Statements	MEDITEX005168 – MEDITEX005184			
798	Bank Statements – Acct. 0919	MEDITEX005185 – MEDITEX005206	6/25/19	h0	6/25/19

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Ex. #	Document	Bate No.	Offered	OBJ	Admitted	
			Date		Date	
799	Bank Statements	MEDITEX005217	6/25/19	no	6/25/19	By
800	Bank Statements	MEDITEX005237 - MEDITEX005244				By
801	Bank Statements	MEDITEX005286 - MEDITEX005296	6/25/19	no	6/25/19	By
802	Bank Statements	MEDITEX005375 - MEDITEX005378	6/12/19	yes	6/12/19	By
803	Bank Records - Deposit	MEDITEX005379 - MEDITEX005380	6/12/19	yes	6/12/19	By
804	Bank Records - Deposit	MEDITEX005381 - MEDITEX005382	6/12/19	yes	6/12/19	By
805	Bank Records - Deposit	MEDITEX005407 - MEDITEX005408	6/25/19	no	6/25/19	By

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
806	Bank Documents	MEDITEX005460 – MEDITEX005472			
807	Zahedi 2998 & 3478 Consumer Acct. App	MEDITEX005474 - MEDITEX005477			
808	Bank Documents	MEDITEX005589 – MEDITEX005590			
809	Bank Documents	MEDITEX005595 – MEDITEX005602			
810	Deposit Slip #8409	MEDITEX005642			
811	Deposit Slip #8409	MEDITEX005644			
812	Deposit Slip #8409	MEDITEX005646			

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			Date	OBJ	Date
Ex. #	Document	Base No:			
813	Deposit Slip #8409	MEDITEX005648			
814	Deposit Slip #2998	MEDITEX005649 - MEDITEX005650			
815	Signature Cards	MEDITEX005659 - MEDITEX005661			
816	Bank Statements	MEDITEX005807 - MEDITEX005810			
817	Bank Statements	MEDITEX005822 - MEDITEX005825	6/14/19	no	6/14/19
818	Bank Statements	MEDITEX005843 - MEDITEX005858			
819	Wells Fargo Bank Statements for Acct. '0477 (Mandana Zahedi Depo Ex. 6)	MEDITEX005951 - MEDITEX005954	6/14/19	no	6/14/19

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
820	Statements Acct #8409 January-February 2012	MEDITEX006446 - MEDITEX006448			
821	Statements Acct #8409 February-March 2012	MEDITEX006452 - MEDITEX006455			
822	Statements Acct #8409 March-April 2012	MEDITEX006456 - MEDITEX006458			
823	Statements Acct #8409 December-January 2013	MEDITEX006487 - MEDITEX006489			
824	Record Certification - Bank of America SDT	MEDITEX006556 - MEDITEX006558	6/25/19	no	6/25/19
825	Bank Documents	MEDITEX006881			
826	Bank Documents	MEDITEX007177			

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Ex. #	Document	Bate No.	Offered	OBJ	Admitted
			Date		Date
827	Bank Documents	MEDITEX007179			
828	Bank Documents	MEDITEX007183			
829	Bank Documents	MEDITEX007185			
830	Bank Documents	MEDITEX007191			
831	Bank Documents	MEDITEX007279			
832	Bank Documents	MEDITEX007281			
833	Bank Documents	MEDITEX007283			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
834	Bank Documents	MEDITEX007285			
835	Bank Documents	MEDITEX007289			
836	Bank Documents	MEDITEX007291			
837	Bank Documents	MEDITEX007295			
838	Bank Documents	MEDITEX007297			
839	Bank Documents	MEDITEX007333			
840	Bank Documents	MEDITEX007341			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
841	Bank Documents	MEDITEX007349			
842	Bank Documents	MEDITEX007355			
843	Bank Documents	MEDITEX007357			
844	Bank Documents	MEDITEX007359			
845	Bank of America #2102 Statement 11/29/12 - 12/27/12	MEDITEX026964 - MEDITEX026967			
846	Bank of America #8143 Statement 12/13/12 - 1/14/13	MEDITEX026976 - MEDITEX026983			
847	Bank of America #8459 Statement 12/15/12 - 1/16/13	MEDITEX026984 - MEDITEX026989			

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Ex. #	Document	Bate No.	Date	OBJ	Date
848	Bank of America #8459 Statement 1/17/13 - 2/13/13	MEDITEX027010 - MEDITEX027013			
849	Signed Acceptance of Service of Subpoena Duces Tecum to Custodian of Records for GSP	GSP000001 - GSP000002	5/22/19	no	5/22/19
850	Signed and notarized Certificate Custodian of Records Affidavit by GSP's CCO	GSP000003 - GSP000004	5/22/19	no	5/22/19
851	Correspondence from GSP to J Blum, Esq. re. Subpoena Duces Tecum	GSP000005	5/22/19	yes	5/22/19
852	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000006 – GSP000056			
853	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000057 – GSP000061	5/22/19	no	5/22/19
854	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000062 – GSP000063			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
855	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000064			
856	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000065 – GSP000067			
857	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000068 – GSP000070			
858	Documents produced by GSP in response to Subpoena Duces Tecum (including but not limited to: purchase	GSP000071 – GSP000076			
859	SCBA Invoice #09986	ASD000082			
860	Email	ASD000244			
861	9/11/15 Email Communications from H. Mojtahed to Aidan re “Sales Invoice for Outstanding Balance”	ASD000274	7/31/19	no	7/31/19

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
862	9/15/15 Customs export hold email from Bill Carter Yusen	ASD000280 – ASD000287			
863	Meditex Accounting docs 2015	ASD000288 – ASD000289			
864	JPMorgan Chase Bank Wire Transfers	ASD000297 – ASD000302			
865	Chamber Application	ASD000308			
866	3/14/13 Board Member Agreement Signed	ASD000323			
867	JPMorgan Chase Bank - Deposit Account Balance Summary for Meditex, LLC	ASD000324 – ASD000325			
868	Chase Bank account ending in 0919 (Mandana Zahedi Depo Ex. 21)	ASD000326			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
869	Wire Transfer Services Outgoing Wire Transfer Requests dated August 8, 2013, October 11, 2013, and May 3, 2013 (Holman's Depo Ex. 46)	ASD000331 – ASD000334	6/13/19	yes	6/13/19
870	Wire Transfer Information (Holman's Depo Ex. 45)	ASD000335 – ASD000336	6/13/19	yes	6/13/19
871	Articles of organization of UTSafety, LLC (Nooshin Zahedi Depo Ex. 1)	ASD000338 – ASD000341	6/14/19	no	6/14/19
872	Email with attachments	ASD000359 – ASD000362			
873	Email	ASD000364			
874	Email re 3-month report 12-15-11	ASD000411			
875	GSP Supplement Order Status 2013	ASD000433			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
876	Emails	ASD000437 – ASD000438			
877	Air Waybill	ASD000442			
878	Email 7-18-14	ASD000700			
879	St. Rose Executive Suites Documents	ASD000837 – ASD000838			
880	Certification of Records - Chase – SCBA Accounts	ASD000906 – ASD000907			
881	Checks and deposit slips relating to UTSafety (Nooshin Zahedi Depo Ex. 10)	ASD000999 – ASD001000			
882	Checks and deposit slips relating to UTSafety (Nooshin Zahedi Depo Ex. 10)	ASD001003			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
883	Signature card Account '4310	ASD004310			
884	11/28/12 Chase Statement – Safari '9608	ASD004524 – ASD004527			
885	12/10/12 Deposit	ASD004531 – ASD004532			
886	12/13/12 Deposit	ASD004533 – ASD004534			
887	Copy of check from Meditex's account to Parvis Safari (Mandana Zahedi Depo Ex. 23)	ASD004878			
888	Copies of checks to Parvis Safari (Mandana Zahedi Depo Ex. 22)	ASD004895 – ASD004896			
889	Signature page for SCBA Chase Account	ASD005626 – ASD005628			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
890	Chase Deposit Slip 12-10-12	ASD009790			
891	Chase Deposit Slip 12-13-12	ASD009792			
892	Banking Records	ASD010073 – ASD010174			
893	Banking Records	ASD010087 – ASD010088			
894	Banking Records	ASD010594 – ASD010603			
895	UTSafety Wells Fargo bank account statement (Nooshin Zahedi Depo Ex. 7)	ASD010791	6/14/19	no	6/14/19
896	Bank statement from Wells Fargo (Nooshin Zahedi Depo Ex. 6)	ASD011200 – ASD011201	6/14/19	yes	6/14/19

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Ex. #	Document	Bate No.	Offered Date	OBJ	Admitted Date
897	Exhibit A to Deposition of Eric Lorenz (Certificate of COR)	N/A			
898	November 15, 2016 Letter from Ovist and Howard to Meditex, LLC (Lorenz's Depo Ex. E)	N/A			
899	Printout from SCBA's website (Holman's Depo Ex. 4)	N/A	6/11/19	no	6/11/19
900	List of Payments (Holman's Depo Ex. 26)	N/A	6/13/19	yes	6/13/19
901	Wells Fargo Bank account statement for Account Ending in '0477 (Mandana Zahedi Depo Ex. 6)	N/A			
902	Non-forwarded version of Bates MEDITEX00135-00138	N/A			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
903	Opposition to Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parvis Safari re: Case No. A-15-729030-C.	N/A			
904	Signed Affidavit of Plaintiff, Parvis Safari in Support of Opposition to Defendant/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari, dated 3-14-18 (illegible)	N/A			
905	Signed Affidavit of Plaintiff, Mandana Zahedi in Support of Opposition to Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari, dated 3-14-18 (illegible)	N/A			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
906	3-15-18 email from wyster@silverstatelaw.com transmitting unsigned affidavits that are legible	N/A			
907	Unsigned Affidavit of Plaintiff, Parvis Safari in Support of Opposition to Defendant/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari, dated 3-14-18 (legible)	N/A			
908	Unsigned Affidavit of Plaintiff, Mandana Zahedi in Support of Opposition to Defendants/Counter-Claimants' Motion for Partial Summary Judgment on Counter-Claimants' Claims Against Parviz Safari, dated 3-14-18 (legible)	N/A			
909	Plaintiff Mandana Zahedi Responses to Hamid Mojtahed's First Requests for Admissions	N/A			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
910	Plaintiff Mandana Zahedi Responses to Hamid Mojtahed's First Set of Interrogatories	N/A	6/19/19	no	6/19/19
911	Plaintiff Mandana Zahedi's Responses to Hamid Mojtahed's First Requests for Production of Documents	N/A			
912	Plaintiff Aidan Davis, FKA Parviz Safari's Supplemental/Revised Responses to Hamid Mojtahed's First Set of Interrogatories (Set No: One - Supplemental/Revised)	N/A	6/19/19	no	6/19/19
913	Plaintiff Aidan Davis, FKA Parviz Safari's Responses to First Set of Interrogatories Set No: One (1)	N/A	6/25/19	no	6/25/19

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Date No.			
WA 914	Plaintiff Aidan Davis, FKA Parviz Safari's Responses to First Set of Requests for Production of Documents	N/A			
WA 915	Plaintiff Aidan Davis, FKA Parviz Safari's Supplemental/Revised Responses to First Set of Interrogatories (Set No: One- First Supplemental/Revised)	N/A			
WA 916	Plaintiff Aidan Davis, FKA Parviz Safari's Supplemental/Revised Responses to Hamid Mojtahed's First Set of Requests for Production of Documents (Set No: One- Supplemental/Revised)	N/A			
WA 917	Plaintiff Aidan Davis, FKA Parviz Safari's Supplemental/Revised Responses to First Set of Requests for Production of Document (Set No: One First Supplemental/Revised)	N/A			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 918	Plaintiff Aidan Davis, FKA Parviz Safari's Supplemental/Revised Responses to First Set of Requests for Admissions (Set No. One First	N/A			
WA 919	Counter-Defendant Nooshin Zahedi's Supplemental Responses to First Set of Interrogatories	N/A			
WA 920	Counter-Defendant Nooshin Zahedi's Supplemental Responses to First Set of Requests for Production of	N/A			
WA 921	Counter-Defendant Nooshin Zahedi's Supplemental Responses to First Set of Requests for Admissions	N/A	6/14/19	no	6/14/19
WA 922	Counter-Defendant Nooshin Zahedi's Second Supplemental Responses to First Set of Requests for Production of Documents	N/A			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Base No.			
WA 923	Plaintiff Aidan Davis Responses to Hamid Mojtahe'd's First Set of Requests for Production of Documents	N/A			
WA 924	Plaintiff Aidan Davis Responses to Hamid Mojtahe'd's First Set of Requests for Admissions	N/A	6/25/19	no	6/25/19
WA 925	Plaintiff Aidan Davis Responses to Hamid Mojtahe'd's First Set of Interrogatories	N/A	6/25/19	no	6/25/19
WA 926	Counter-Defendant Nooshin Zahedi's Responses to First Set of Requests for Admissions	N/A			
WA 927	Counter-Defendant Nooshin Zahedi's Responses to First Set of Interrogatories	N/A			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
928	Counter-Defendant Nooshin Zahedi's Responses to First Set of Requests for Production of Documents	N/A			
929	Counter-Defendant Nooshin Zahedi's Third Supplemental Responses to First Set of Requests for Production of Documents; Set No: One(1) - Third Supplemental / Revised/Ellsworth & Bennion	N/A			
930	Plaintiff Aidan Davis, fka Parviz Safari's Supplemental/Revised Responses to Hamid Mojtahed's First Set of Interrogatories; Set No: One (1) - Second Supplemental/Revised	N/A	6/12/19	no	6/12/19

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
931	Plaintiff Aidan Davis, fka Parviz Safari's Supplemental/Revised Responses to Hamid Mojtahed's First Set of Requests for Production of Documents; Set No: One (1) - Second Supplemental/Revised	N/A			
932	Plaintiff Aidan Davis, fka Parviz Safari's Second Supplemental/Revised Responses to First Set of Requests for Production of Documents; Set No: One (1) - Second Supplemental / Revised	N/A			
933	Plaintiff Aidan Davis, fka Parviz Safari's Supplemental/Revised Responses to First Set of Interrogatories; Set No: One (1) - Second Supplemental/Revised	N/A	6/25/19	no	6/25/19
934	Plaintiff Aidan Davis, FKA Parviz Safari's Responses to First Set of Requests for Admissions	N/A			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
935	Bank Statements	MEDITEX003657 – MEDITEX003662			
936	Bank Statements	MEDITEX003669			
937	Bank Statements	MEDITEX004217 - MEDITEX004220			
938	Bank Statements	MEDITEX004231 - MEDITEX004232			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 939	Bank Statements	MEDITEX004233 - MEDITEX004234			
WA 940	Bank Statements	MEDITEX004235 - MEDITEX004236			
WA 941	Bank Statements	MEDITEX004278 - MEDITEX004287			
WA 942	Bank Statements	MEDITEX004488 - MEDITEX004491			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 943	Bank Statements	MEDITEX004539 – MEDITEX004543			
WA 944	Bank Statements	MEDITEX004567 – MEDITEX004570			
WA 945	Bank Statements	MEDITEX004607 – MEDITEX004611			
WA 946	Bank Statements	MEDITEX004668 – MEDITEX004673			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 947	Bank Statements	MEDITEX004697 - MEDITEX004701			
WA 948	Bank Statements	MEDITEX004716 - MEDITEX004733			
WA 949	Bank Statements	MEDITEX004738 - MEDITEX004739			
WA 950	Bank Statements	MEDITEX004743 - MEDITEX004818	6/19/19	no	6/19/19

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
951	Bank Statements	MEDITEX004822 - MEDITEX004826			
952	Bank Statements	MEDITEX004842 - MEDITEX004845			
953	Bank Statements	MEDITEX004993 - MEDITEX005005			
954	Bank Statements	MEDITEX005014 - MEDITEX005017			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
955	Bank Statements	MEDITEX005018 - MEDITEX005027			
956	Bank Statements	MEDITEX005028 - MEDITEX005035			
957	Bank Statements	MEDITEX005036 - MEDITEX005043			
958	Bank Statements	MEDITEX005092 - MEDITEX005115			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
959	Bank Statements	MEDITEX005116 - MEDITEX005126			
960	Bank Statements	MEDITEX005162 - MEDITEX005167			
961	Bank Statements	MEDITEX005207 - MEDITEX005218			
962	Bank Statements	MEDITEX005219 - MEDITEX005236			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
963	Bank Statements	MEDITEX005237 - MEDITEX005255			
964	Bank Statements	MEDITEX005271 - MEDITEX005285			
965	Bank Statements	MEDITEX005302 - MEDITEX005352	6/19/19	no	6/19/19
966	Bank Statements	MEDITEX009250 - MEDITEX009251			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 967	Bank Statements	MEDITEX026070 - MEDITEX026073			
WA 968	Bank Statements	MEDITEX026094 - MEDITEX026097			
WA 969	Bank Statements	MEDITEX0026098 - MEDITEX0026103			
WA 970	Bank Statements	MEDITEX026118 - MEDITEX026127			

			Offered		Admitted
Ex. #	Document	Bate No.	Date	OBJ	Date
WA 971	Bank Statements	MEDITEX026142 - MEDITEX026145			
WA 972	Bank Statements	MEDITEX026166 - MEDITEX026169	6/25/19	no	6/25/19
WA 973	Bank Statements	MEDITEX026170- MEDITEX026177	6/25/19	no	6/25/19
WA 974	Bank Statements	MEDITEX026194- MEDITEX026197			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
975	Bank Statements	MEDITEX026228 - MEDITEX026231			
976	Bank Statements	MEDITEX026262 - MEDITEX026265			
977	Bank Statements	MEDITEX026298 - MEDITEX026301			
978	Bank Statements	MEDITEX026330 - MEDITEX026333			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
979	Bank Statements	MEDITEX026362 - MEDITEX026365			
980	Bank Statements	MEDITEX026398 - MEDITEX026401			
981	Bank Statements	MEDITEX026430 - MEDITEX026433			
982	Bank Statements	MEDITEX026466 - MEDITEX026469			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 983	Bank Statements	MEDITEX026470 - MEDITEX026479			
WA 984	Bank Statements	MEDITEX026502 - MEDITEX026505			
WA 985	Bank Statements	MEDITEX026534 - MEDITEX026537			
WA 986	Bank Statements	MEDITEX026572 - MEDITEX026575			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
987	Bank Statements	MEDITEX026608 - MEDITEX026611			
988	Bank Statements	MEDITEX026612 - MEDITEX026619			
989	Bank Statements	MEDITEX026638 - MEDITEX026641			
990	Bank Statements	MEDITEX026670 - MEDITEX026673			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WT 991	Bank Statements	MEDITEX026710 - MEDITEX026713			
WT 992	Bank Statements	MEDITEX026742 - MEDITEX026743			
WT 993	Bank Statements	MEDITEX026968 - MEDITEX026975			
WT 994	Bank Statements	MEDITEX027368 - MEDITEX027375			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
WA 995	Bank Statements	MEDITEX027440 - MEDITEX027453			
WA 996	Bank Statements	MEDITEX027476 - MEDITEX027489			
WA 997	Bank Statements	MEDITEX027814- MEDITEX027819			
WA 998	Bank Statements	MEDITEX027868 - MEDITEX027881			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Document	Bate No.			
999	Bank Statements	MEDITEX027896 - MEDITEX027899			
1000	Bank Statements	MEDITEX027926 - MEDITEX027935			

EXHIBIT(S) LIST

DEFENDANT'S EXHIBITS

Exhibit Number	Exhibit Description	Date Offered	Objection	Date Admitted	
1001	demonstrative - Act. info for GSP	5/22/19	no	5/22/19	WA
1002	emails from Aidan Safari	6/13/19	no	6/13/19	WA
1003	Exhibit 10 to Moshin Zahedi deposition	6/14/19	no	6/14/19	WA
1004	medical documents - Mr. Safari	6/14/19	no	6/14/19	WA
1005	NutraLab Com. Invoices ASD 000097-98	6/21/19	No	6/21/19	WA
1006	NutraLab Commercial Invoices ASD 000030	6/21/19	No	6/21/19	WA
1007	NutraLab Commercial Invoices ASD 000108-109	6/21/19	No	6/21/19	WA
B1	demonstrative	6/25/19	no	6/25/19	WA
B2	demonstrative	6/25/19	no	6/25/19	WA
B3	demonstrative	6/25/19	no	6/25/19	WA
1008	Meditex proforma invoice 0414 4/29/13	7/17/19	no	7/17/19	WA
D1	demonstrative - expert				WA
1009	Subpoena	8/1/19	no	8/1/19	WA
1010	Subpoena + docs regarding Batool Zamanian				WA
6930a	630 Meditex 000419	7/31/19	no	7/31/19	AS
695a	695 Meditex 002371	7/17/19	yes	7/17/19	AS
695b	695 Meditex 002378	7/17/19	no	7/17/19	AS
695c	695 Meditex 002379	7/17/19	no	7/17/19	AS
695d	695 Meditex 002365	7/17/19	no	7/17/19	AS
695e	695 Meditex 002384	7/17/19	no	7/17/19	AS
695f	695 Meditex 002354	7/17/19	no	7/17/19	AS
695g	695 Meditex 002359	7/17/19	no	7/17/19	AS
695h	695 Meditex 002357	7/17/19	no	7/17/19	AS

EXHIBIT(S) LIST

Case No.: A-15-729030-B

Trial Date: July 15, 2020

Dept. No. 13

Judge: Denton

Court Clerk: Madalyn Kearney

PLAINTIFFS: Parviz Safari & Mandana Zahedi

Recorder: Jennifer Gerold

Counsel for Plaintiff: Andrew

VS.

Flahive, Esq.

Counsel Defendant: Jonathan

Blum, Esq.

DEFENDANTS: Hamid Modjtahed, Mohammad

Modjtahed, et al.

*Exhibits marked as
Plaintiff's Exhs. for purposes
of this
trial*

TRIAL BEFORE THE COURT - PUNITIVE DAMAGES HEARING

DEFENDANTS/ COUNTERCLAIMANTS' EXHIBIT LIST

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
1	BOA Affidavit of COR	PUNI-001916 – PUNI-001927	7/15/20	no	7/15/20
2	BOA Signature cards	PUNI-001928 – PUNI-001943			
3	BOA Affidavit of COR	PUNI-000294 – PUNI-000295	7/15/20	no	7/15/20

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
4	BOA signature cards	PUNI-000296 – PUNI-000299	7/15/20	no	7/15/20
5	Bank Statement	PUNI-001614 – PUNI-001621			
6	Bank Statement	PUNI-001630 – PUNI-001637			
7	Bank Statement	PUNI-001646 – PUNI-001655			
8	Bank Statement	PUNI-001656 – PUNI-001663			
9	Bank Statement	PUNI-001664 – PUNI-001671			
10	Bank Statement	PUNI-001672 – PUNI-001681	7/15/20	no	7/15/20

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			Offered		Admitted	
			Date	OBJ	Date	
Ex. #	Exhibit Description	Bates No.				
11	Bank Statement	PUNI-001682 – PUNI-001689	7/15/20	no	7/15/20	WA
12	Bank Statement	PUNI-001690 – PUNI-001697				WA
13	Bank Statement	PUNI-001698 – PUNI-001703				WA
14	Bank Statement	PUNI-001704 – PUNI-001709				WA
15	Bank Statement	PUNI-001710 – PUNI-001719				WA
16	Bank Statement	PUNI-001720 – PUNI-001727				WA
17	Bank Statement	PUNI-001736 – PUNI-001745	7/15/20	no	7/15/20	WA

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
18	Bank Statement	PUNI-001746 – PUNI-001755	7/15/20	no	Check with bank 7/15/20
19	Bank Statement	PUNI-001756 – PUNI-001765			
20	Bank Statement	PUNI-001766 – PUNI-001775			
21	Bank Statement	PUNI-001786 – PUNI-001795			
22	Bank Statement	PUNI-001876 – PUNI-001883			
23	Bank Statement	PUNI-001884 – PUNI-001891	7/15/20	no	7/15/20

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
24	Bank Statement	PUNI-001892 – PUNI-001899	7/15/20	no	7/15/20
25	Bank Statement	PUNI-001900 – PUNI-001907			
26	Bank Statement	PUNI-001908 – PUNI-001915			
27	Bank Statement	PUNI-001034 – PUNI-001041	7/15/20	no	7/15/20

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
28	Bank Statement	PUNI-001056 – PUNI-001063	7/15/20	no	7/15/20
29	Bank Statement	PUNI-001042 – PUNI-001049			
30	Bank Statement	PUNI-001028 – PUNI-001033			
31	Bank Statement	PUNI-001064 – PUNI-001069			
32	Bank Statement	PUNI-001022 – PUNI-001027			
33	Bank Statement	PUNI-000998 – PUNI-001003	7/15/20	no	7/15/20

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
34	BOA signature cards	PUNI-000994 – PUNI-000997			
35	BOA Statement	PUNI-002054 – PUNI-002063	7/15/20	no	7/15/20
36	BOA Statement	PUNI-002042 – PUNI-002053	7/15/20	no	7/15/20

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
37	BOA Statement	PUNI-002030 – PUNI-002041			
38	BOA Statement	PUNI-002020 – PUNI-002029			
39	BOA Statement	PUNI-002010 – PUNI-002019			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
40	BOA Statement	PUNI-002000 – PUNI-002009			
41	BOA Statement	PUNI-001988 – PUNI-001999			
42	BOA Statement	PUNI-000303			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
43	BOA Statement	PUNI-001964 – PUNI-001975			
44	BOA Statement	PUNI-001954 – PUNI-001963			
45	BOA Statement	PUNI-001944 – PUNI-001953			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
46					
47	Court Transcript	PUNI-000285 – PUNI-000293			
48	BOA Affidavir for COR	PUNI-0000001 – PUNI-000003	7/15/20	no	7/15/20
49	Bank Checks	PUNI-000004 – PUNI-000025			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
50	Bank Statements	PUNI-000026 – PUNI-000048			
51	Chase Affidavit of COR	PUNI-000049			
52	Bank Checks	PUNI-000050 – PUNI-000077			
53	Wells Fargo Affidavit of COR	PUNI-000078 – PUNI-000081			
54	Bank deposit slips and checks	PUNI-000082 – PUNI-000085			
55	Bank Statements	PUNI-000086 – PUNI-000087			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
56	BOA Affidavit of COR	PUNI-000088	7/15/20	h o	7/15/20
57	BOA Wire Transfer Reports	PUNI-000089 – PUNI-000097			
58	Chase Affidavit of COR	PUNI-000098 – PUNI-000099			
59	Bank Statement	PUNI-000100 – PUNI-000103			
60	Bank Statement	PUNI-000104 – PUNI-000107			
61	Bank Statement	PUNI-000108 – PUNI-000111			

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
62	Grant Bargain Sale Deed	PUNI-000112 – PUNI-000117			
63	Grant Bargain Sale Deed	PUNI-000118 – PUNI-000125			
64	BOA Affidavit of COR	PUNI-000126 – PUNI-000128			
65	Bank Checks	PUNI-000129 – PUNI-000133			
66	Chase Affidavit of COR	PUNI-000134			
67	Bank Checks	PUNI-000135 – PUNI-000140			
68	BOA signature cards	PUNI-000141 – PUNI-000146			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
69	Bank Statements	PUNI-000147 – PUNI-000212			check
70	Bank Checks	PUNI-000213 – PUNI-000279			
71	Bank Check and Statement	PUNI-000280 – PUNI-000281			
72	US Bank Statements	PUNI-000282 – PUNI-000284			
73	BOA Statements	PUNI-000300 – PUNI-000391	7/15/20	no	7/15/20

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
74	Wells Fargo Affidavit of COR	PUNI-000392 – PUNI-000394			
75	Wells Fargo Signature cards	PUNI-000395 – PUNI-000396			
76	Deposit Slip	PUNI-000397			

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
77	US Bank Affidavit of COR	PUNI-000398 – PUNI-000399			
78	US Bank Signature Card	PUNI-000400			
79	US Bank Statements	PUNI-000401 – PUNI-000423	7/15/20	check no	7/15/20 <i>wr</i>
80	Chase Affidavit of COR	PUNI-000424 – PUNI-000426	7/15/20	no	7/15/20 <i>wr</i>

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
81	Chase Statements	PUNI-000427 – PUNI-000501			
82	Bank Check	PUNI-000502			
83	Chase signature cards	PUNI-000503 – PUNI-000507			
84	Safaro v. Espinoza Complaint filed – Oregon, January 18, 2019	PUNI-002398-002404	7/15/20	yes	
85	Bank of America Statement	PUNI-001004-001021	7/15/20	no	7/15/20
86	Bank Statement	PUNI-001050 – PUNI-001055	7/15/20	no	7/15/20

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
87	Deposit Slips	PUNI-001072 – PUNI-001078			
88	Chase Bank Affidavit of COR	PUNI-002064 – PUNI-002065			
89	Bank Statement	PUNI-002151 – PUNI-002154	7/15/20	no	7/15/20
90	Bank Statement	PUNI-002165 – PUNI-002168			
91	Bank Statement	PUNI-002170 – PUNI-002173			
92	Bank Statement	PUNI-002175 – PUNI-002178			
93	Bank Statement	PUNI-002183 – PUNI-002186	7/15/20	no	7/15/20

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
94	Bank Statement	PUNI-002189 – PUNI-002192	7/15/20	ho	7/15/20
95	Bank Statement	PUNI-002196 – PUNI-002199	7/15/20	ho	7/15/20
96	Bank Statement	PUNI-002208 – PUNI-002209			
97	Signature Card	PUNI-002211 – PUNI-002212			
98	Bank Statement	PUNI-002229 – PUNI-002234	7/15/20	ho	7/15/20
99	Bank Statement	PUNI-002241 – PUNI-002246			
100	Bank Statement	PUNI-002247 – PUNI-002252	7/15/20	ho	7/15/20

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			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
101	Bank Statement	PUNI-002253 – PUNI-002260	7/15/20	no	7/15/20
102	Bank Statement	PUNI-002261 – PUNI-002268			
103	Bank Statement	PUNI-002269 – PUNI-002274			
104	Bank Statement	PUNI-002275 – PUNI-002278			
105	Bank Statement	PUNI-002291 – PUNI-002294			
106	Bank Statement	PUNI-002295 – PUNI-002300			
107	Bank Statement	PUNI-002301 – PUNI-002308	7/15/20	no	7/15/20

			Offered		Admitted
			Date	OBJ	Date
Ex. #	Exhibit Description	Bates No.			
108	Bank Statement	PUNI-002309 – PUNI-002312	7/15/20	no	7/15/20
109	Bank Statement	PUNI-002313 – PUNI-002318			
110	Bank Statement	PUNI-002319 – PUNI-002322			
111	Chandra Bunbung email		7/15/20	no	7/15/20

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EIGHTH JUDICIAL DISTRICT COURT CLERK'S OFFICE
NOTICE OF DEFICIENCY
ON APPEAL TO NEVADA SUPREME COURT

TOM W. STEWART, ESQ.
8918 SPANISH RIDGE AVE., SUITE 100
LAS VEGAS, NV 89148

DATE: December 28, 2020
CASE: A-15-729030-B

RE CASE: PARVIZ SAFARI and MANDANA ZAHEDI, individually and on behalf of MEDITEX, LLC vs. HAMID MODJTAHED

NOTICE OF APPEAL FILED: December 26, 2020

YOUR APPEAL HAS BEEN SENT TO THE SUPREME COURT.

PLEASE NOTE: DOCUMENTS **NOT** TRANSMITTED HAVE BEEN MARKED:

- ☒ \$250 – Supreme Court Filing Fee (Make Check Payable to the Supreme Court)**
 - If the \$250 Supreme Court Filing Fee was not submitted along with the original Notice of Appeal, it must be mailed directly to the Supreme Court. The Supreme Court Filing Fee will not be forwarded by this office if submitted after the Notice of Appeal has been filed.
- ☐ \$24 – District Court Filing Fee (Make Check Payable to the District Court)**
- ☒ \$500 – Cost Bond on Appeal (Make Check Payable to the District Court)**
 - NRAP 7: Bond For Costs On Appeal in Civil Cases
 - *Previously paid Bonds are not transferable between appeals without an order of the District Court.*
- ☐ Case Appeal Statement
 - NRAP 3 (a)(1), Form 2
- ☐ Order
- ☐ Notice of Entry of Order

NEVADA RULES OF APPELLATE PROCEDURE 3 (a) (3) states:

"The district court clerk must file appellant's notice of appeal despite perceived deficiencies in the notice, including the failure to pay the district court or Supreme Court filing fee. The district court clerk shall apprise appellant of the deficiencies in writing, and shall transmit the notice of appeal to the Supreme Court in accordance with subdivision (g) of this Rule with a notation to the clerk of the Supreme Court setting forth the deficiencies. Despite any deficiencies in the notice of appeal, the clerk of the Supreme Court shall docket the appeal in accordance with Rule 12."

Please refer to Rule 3 for an explanation of any possible deficiencies.

*****Per District Court Administrative Order 2012-01, in regards to civil litigants, "...all Orders to Appear in Forma Pauperis expire one year from the date of issuance." You must reapply for in Forma Pauperis status.***

Certification of Copy

State of Nevada }
County of Clark } SS:

I, Steven D. Grierson, the Clerk of the Court of the Eighth Judicial District Court, Clark County, State of Nevada, does hereby certify that the foregoing is a true, full and correct copy of the hereinafter stated original document(s):

PLAINTIFFS'/COUNTERDEFENDANTS' NOTICE OF APPEAL;
PLAINTIFFS'/COUNTERDEFENDANTS' CASE APPEAL STATEMENT; DISTRICT COURT
DOCKET ENTRIES; CIVIL COVER SHEET; FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
JUDGMENT REGARDING PUNITIVE DAMAGES; NOTICE OF ENTRY OF FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND JUDGMENT, REGARDING PUNITIVE DAMAGES; FINAL
JUDGMENT; NOTICE OF ENTRY OF FINAL JUDGMENT; ORDER DENYING
PLAINTIFFS'/COUNTERDEFENDANT'S MOTION TO ALTER OR AMEND THE JUDGMENT
AND FOR NEW TRIAL; NOTICE OF ENTRY OF ORDER DENYING
PLAINTIFFS'/COUNTERDEFENDANTS' MOTION TO ALTER OR AMEND THE JUDGMENT
AND FOR NEW TRIAL; DISTRICT COURT MINUTES; EXHIBITS LIST; NOTICE OF
DEFICIENCY

PARVIZ SAFARI and MANDANA ZAHEDI,
individually and on behalf of MEDITEX, LLC,

Plaintiff(s),

vs.

HAMID MODJTAHED,

Defendant(s),

Case No: A-15-729030-B

Dept No: XIII

now on file and of record in this office.

IN WITNESS THEREOF, I have hereunto
Set my hand and Affixed the seal of the
Court at my office, Las Vegas, Nevada
This 28 day of December 2020.

Steven D. Grierson, Clerk of the Court



Heather Ungermann, Deputy Clerk