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

16
17 SHELDON G. ADELSON,) Case No. 67120
18)
19 Appellant,)
20)
21 vs.)
22)
23 DAVID A. HARRIS; MARC R. STANLEY;)
24 AND NATIONAL JEWISH DEMOCRATIC)
25 COUNCIL,)
26 Respondents.)
27)
28)

25 **NOTICE OF SUGGESTION OF RECUSAL**

1 Respondents David A. Harris, Marc R. Stanley, and National Jewish
2 Democratic Council, through their undersigned counsel, hereby submit the
3 following Notice of Suggestion of Recusal.

4
5 On April 4, 2016, this Court will hear oral argument in this defamation action
6 brought by Appellant Sheldon G. Adelson, which is before this Court on questions
7 of law certified to it by the United States Court of Appeals for the Second Circuit.
8 Appellant's Complaint challenges what he claims are Respondents' "false and
9 defamatory statements that conveyed to the public that Mr. Adelson personally
10 approved of and profited from prostitution" in casinos with which he is affiliated in
11 Macau. Joint Appendix Vol. I at 21 ¶ 1 (quoting Complaint). In his Complaint,
12 Appellant specifically contends that the statements he challenges injured his
13 reputation, in significant part, because, with his wife, he has established the Dr.
14 Miriam and Sheldon G. Adelson Clinic for Drug Abuse Treatment & Research in
15 Israel as well as similar clinics in Macau and Las Vegas, all of which offer drug
16 treatment and counseling services to those in need, *id.* at 23-24 ¶¶ 17-19, and
17 because "[m]any of the hundreds of patients seen by the Adelson Clinics are
18 women whose addiction has forced them into prostitution." *Id.* at 24 ¶ 20. The
19 statements at issue were published by Respondents in 2012.
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25 Justice Michael Cherry served as a Director of the Dr. Miriam and Sheldon
26 G. Adelson Clinic for Drug Abuse Treatment & Research, Inc. in Nevada at the
27 time the statements at issue were published. Because this appeal arises from
28

1 questions of law certified by the Second Circuit, the members of this Court are
2 likely not yet familiar with the specific allegations of Appellant's Complaint
3 regarding the Adelson Clinic. Given those allegations, Respondents respectfully
4 suggest it is appropriate that Justice Cherry consider recusing himself from this
5 appeal.
6

7 DATED this 26th day of February 2016.

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9 LEVINE SULLIVAN
10 KOCH & SCHULZ, LLP

11 By /s/ Lee Levine

12 Lee Levine (*pro hac vice*)

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14 and

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