

IN THE SUPREME COURT OF THE STATE OF NEVADA

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Tracie K. Lindeman
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Case Number: 62944

District Court Case Number
A627691-B

LAS VEGAS SANDS CORP., a Nevada
corporation, and SANDS CHINA LTD., a
Cayman Islands corporation

Petitioners,

vs.

THE EIGHTH JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA, IN AND FOR
THE COUNTY OF CLARK; AND THE
HONORABLE ELIZABETH GONZALEZ,
DISTRICT JUDGE,

Respondents,

and

STEVEN C. JACOBS,

Real Party in Interest.

LAS VEGAS SANDS CORP., a Nevada
corporation, and SANDS CHINA LTD., a
Cayman Islands corporation

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**REPLY IN SUPPORT OF
REQUEST FOR ORAL
ARGUMENT IN
RELATED CASES No.
62944 AND 63444**

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Despite his expressed eagerness to advance this case, Real Party in Interest Steven Jacobs objects to Petitioners' straightforward request to set oral argument on two cases this Court previously said would be clustered for consideration. Notably, however, Jacobs' response provides no basis upon which the request should be denied. Instead, he uses his response as an excuse to again mount ad hominem attacks on Petitioners.

Jacobs' sharp language and ad hominem attacks misconstrue the record facts. They offer no valid reason to suppress thoroughly ventilating the issues that the Court has found worthy of consideration. Petitioners' Request for Oral Argument is not a "repeat of Petitioners' previously denied motion to consolidate," as Jacobs protests (Resp. at 1:20); in fact, the request does not even discuss much less request consolidation. And the delays Jacobs complains of are of its own making: He and his counsel have long had more than enough information to address the issue of whether Nevada courts have jurisdiction over SCL, yet they have done all in their power to avoid the jurisdictional hearing this Court ordered by insisting on yet more discovery and inviting sanction proceedings against opposing counsel and their clients based on the same type of ad hominem remarks presented to this Court in lieu of substantive arguments. *See, e.g.,* Writ 2 (Doc. 2013-10083) at 27 ("But in this case the discovery process has taken on a life of its own, as the plaintiff has pursued a 'discovery tort' – hoping to win the jurisdictional issue, not on the merits, but based on the imposition of sanctions for some perceived discovery misstep."); Writ 3 (Doc. 2013-18373) at 2 (Without examination of the underlying documents or any finding that the documents were relevant to the jurisdictional inquiry, "the district court ordered the en masse disclosure of thousands of documents

containing privileged information to plaintiff and his attorneys within 10 days," based on its determination that plaintiff fell within an undefined "sphere of persons" entitled to review and use a corporation's privileged documents against it).

Petitioners respectfully submit that allowing oral argument on the two remaining petitions would enable the Court to resolve the pending issues "in a consistent and efficient manner" (8/8/13 Order [Doc. 13-23251], citing IOP 2(c)(2)) and respectfully ask the Court to grant their request.

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CERTIFICATE OF SERVICE

Pursuant to Nev. R. App. P. 25(b) and NEFR 9(f), I hereby certify that I am an employee of Morris Law Group; that on this date I electronically filed the foregoing **REPLY IN SUPPORT OF REQUEST FOR ORAL ARGUMENT IN RELATED CASES No. 62944 AND 63444** with the Clerk of the Court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (Eflex). Participants in the case who are registered with Eflex as users will be served by the Eflex system as follows:

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Pursuant to Nev. R. App. P. 25, I caused a copy of the **REPLY IN SUPPORT OF REQUEST FOR ORAL ARGUMENT IN RELATED CASES No. 62944 AND 63444** to be hand-delivered on the date and to the addressee(s) shown below:

Judge Elizabeth Gonzalez
Eighth Judicial District Court of
Clark County, Nevada
Regional Justice Center
200 Lewis Avenue
Las Vegas, Nevada 89155

Respondent

DATED this 4th day of December, 2013.

By: /s/Fiona Ingalls