

IN THE SUPREME COURT OF THE STATE OF NEVADA

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

Petitioners,

vs.

CLARK COUNTY DISTRICT
COURT AND THE HONORABLE
ELIZABETH GONZALEZ,
DISTRICT JUDGE,

Respondents,

and

STEVEN C. JACOBS,

Real Party in Interest.

Sup. Ct. Case No. 63444

District Court Case No. A-10-627691
Electronically Filed
Jul 03 2013 09:06 a.m.

Tracie K. Lindeman
Clerk of the Supreme Court
**STEVEN C. JACOBS' MOTION
TO PERMIT FILING OF AN
OPPOSITION IN EXCESS OF
TEN PAGES IN RESPONSE TO
EMERGENCY MOTION UNDER
NRAP 27(e) TO STAY THE
DISTRICT COURT'S JUNE 19,
2013, ORDER**

Pursuant to NRAP 27(d)(2), Real Party in Interest Steven C. Jacobs ("Jacobs") moves to file an opposition to Petitioners Las Vegas Sands Corp. and Sands China Ltd.'s Emergency Motion Under NRAP 27(e) to Stay the District Court's June 19, 2013, Order in excess of ten pages. The basis for this request is that Petitioners' Emergency Motion for Stay relies upon and incorporates their thirty-page writ petition as the factual and legal basis for seeking a stay. Any fair ability to respond to those arguments and factual assertions, many of which Jacobs maintains are inaccurate, necessitates more than ten pages. Accordingly, Jacobs requests leave to file an opposition brief not to exceed twenty-five pages, which is submitted contemporaneously herewith.

1 This Motion is made and based upon NRAP 27(d)(2), the attached
2 Declaration of Todd L. Bice, Esq., as well as the papers and pleadings on file with
3 the Court.

4 DATED this 2nd day of July, 2013.

5 PISANELLI BICE, PLLC

6 By: /s/ Todd L. Bice
7 James J. Pisanelli, Esq., No. 4027
8 Todd L. Bice, Esq., No. 4534
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13 Attorneys for Real Party in Interest,
14 Steven C. Jacobs
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**DECLARATION OF TODD L. BICE, ESQ. IN SUPPORT OF
STEVEN C. JACOBS' MOTION TO PERMIT FILING OF
AN OPPOSITION IN EXCESS OF TEN PAGES IN RESPONSE TO
EMERGENCY MOTION UNDER NRAP 27(e) TO STAY THE
DISTRICT COURT'S JUNE 19, 2013, ORDER**

I, TODD L. BICE, ESQ., declare as follows:

1. I am a resident of the State of Nevada, and a partner with the law firm of Pisanelli Bice PLLC, counsel for Plaintiff Steven C. Jacobs ("Jacobs") in the above-captioned matter. I have personal knowledge of the following, and can and do competently testify thereto.

2. NRAP 27(d)(2) provides, "[a] motion or a response to a motion shall not exceed 10 pages, unless the court permits or directs otherwise."

3. On Thursday, June 27, 2013, Petitioners Las Vegas Sands Corp. and Sands China Ltd. filed the Emergency Motion under NRAP 27(e) to Stay the District Court's June 19, 2013, Order.

4. As set forth in Jacobs' concurrently-filed Opposition, Petitioners' Emergency Motion for Stay omits many pertinent facts for this Court's fair determination of that Motion. To fairly address those omissions, Jacobs requires more than the ten pages that NRAP 27(d)(2) allows.

5. Jacobs has made a good faith effort to minimize the Opposition's page length. The Declarant has endeavored to ensure that the Opposition's length is no longer than needed to fairly respond to Petitioners' Emergency Motion for Stay.

6. For these reasons, Jacobs respectfully requests permission to file an opposition in excess of ten pages, but not more than twenty-five pages. I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct and that I signed this Declaration on July 2, 2013.

/s/ Todd L. Bice
TODD L. BICE, ESQ.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Pisanelli Bice, PLLC, and pursuant to Nev. R. App. P. 25(b) and NEFR 9(d), that on this date I e-filed and sent via email and United States Mail, postage prepaid, the foregoing **STEVEN C. JACOBS' MOTION TO PERMIT FILING OF AN OPPOSITION IN EXCESS OF TEN PAGES IN RESPONSE TO EMERGENCY MOTION UNDER NRAP 27(e) TO STAY THE DISTRICT COURT'S JUNE 19, 2013, ORDER** properly addressed to the following:

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SERVED VIA HAND-DELIVERY ON JULY 3, 2013

Judge Elizabeth Gonzalez
Eighth Judicial District Court
Regional Justice Center
200 Lewis Avenue
Las Vegas, NV 89155

DATED this 2nd day of July, 2013.

/s/ Kimberly Peets
An employee of Pisanelli Bice, PLLC