

IN THE SUPREME COURT OF THE STATE OF NEVADA

Electronically Filed
Nov 14 2013 04:19 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

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

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.

Case Number: 63444

District Court Case Number
A627691-B

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

MORRIS LAW GROUP
Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
900 Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101
Telephone No.: (702) 474-9400

HOLLAND & HART LLP
J. Stephen Peek, Esq., Bar No. 1759
Robert J. Cassity, Esq., Bar No. 9779
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
Telephone No.: (702) 669-4600

KEMP, JONES & COULTHARD
J. Randall Jones, Bar No. 1927
Mark M. Jones, Bar No. 267
3800 Howard Hughes Pkwy, 17th Flr.
Las Vegas, Nevada 89169
Telephone No.: (702) 385-6000

Attorneys for Petitioners

Between January and June 2013, Petitioner filed three writ petitions challenging three separate but related discovery orders of the district court in the underlying case, *Jacobs v. Las Vegas Sands Corp. and Sands China Ltd.*¹ The orders exceed the scope of the Order of August 26, 2011 by which this Court issued a Writ of Mandamus directing the district court to "hold a evidentiary hearing on personal jurisdiction" over Sands China, Ltd. ("SCL"), "and to stay the action as set forth in the order until after entry of [the district court's] jurisdiction decision." Order (Doc. 11-26107) and Writ of Mandamus (Doc. 11-28569). An evidentiary hearing on jurisdiction has yet to be held.

On August 8, 2013, this Court denied Petitioner's Motion to Consolidate the three writ petitions but stated that the petitions would "nonetheless be clustered based on any overlapping legal issues." (Doc. 13-23251). Petitioners respectfully ask the Court to allow them to present oral argument on the two remaining petitions. Writs 2 and 3 are substantively related; both are fully briefed and are in the Court's screening process. The two remaining petitions address questions of privilege that the district court did not need to address to determine whether SCL is subject to jurisdiction in Nevada. The two pending petitions, like the first in No. 62489, also raise a reasonable question about the efficient management of this case following the Court's August 2011 Remand Order.

¹ These petitions are referred to in the order of their filing as "Writ 2," (No. 62944), and "Writ 3," (No. 63444). Oral argument on "Writ 1" (No. 62489), filed January 24, 2013, was presented on October 9, 2013 and is under submission.

Scheduling 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)).

MORRIS LAW GROUP

By: /s/ STEVE MORRIS
Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
900 Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101

KEMP JONES & COULTHARD, LLP
J. Randall Jones, Bar No. 1927
Mark M. Jones, Esq., Bar No. 267
3800 Howard Hughes Pkwy., 17th Fl.
Las Vegas, NV 89169

HOLLAND & HART LLP
J. Stephen Peek, Esq., Bar No. 1759
Robert J. Cassity, Esq., Bar No. 9779
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

Attorneys for Petitioners

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 **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:

James J. Pisanelli
Todd L. Bice
Debra Spinelli
Pisanelli Bice
3883 Howard Hughes Parkway, Suite 800
Las Vegas, Nevada 89169

Attorneys for Steven C. Jacobs, Real Party in Interest

Pursuant to Nev. R. App. P. 25, I caused a copy of the **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 14th day of November, 2013.

By: /s/ PATRICIA A. FERRUGIA