

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,

v.

CLARK COUNTY DISTRICT
COURT, THE HONORABLE
ELIZABETH GONZALEZ,
DISTRICT JUDGE, DEPT. 11,

Respondents,

and

STEVEN C. JACOBS,

Real Party in Interest.

Case No.: 67576

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Tracie K. Lindeman
Clerk of Supreme Court

**REAL PARTY IN INTEREST
STEVEN C. JACOBS' NOTICE
OF INTENT TO OPPOSE
PETITIONERS' EMERGENCY
MOTION TO STAY UNDER
NRAP 27(e)**

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Steven C. Jacobs*

Real Party in Interest Stephen C. Jacobs ("Jacobs") gives this notice that he intends to oppose Petitioner's Emergency Motion for Stay. And he will do so prior to March 19, 2015. But, Jacobs files this notice to note the procedural impropriety as to the filing of the motion and its timing. Yesterday afternoon, without providing proper notice to counsel,¹ Petitioners Las Vegas Sands Corp. ("LVSC") and Sands China Ltd. ("Sands China") filed what it characterized as a Motion to Stay, claiming that action is needed on or before Thursday, March 19, 2015, while admitting that they have no intention of filing an actual petition until after they see how this Court rules upon their request for stay. However, in securing a hearing on its requested stay before the District Court, on just one judicial day's notice, for March 13, 2015, Petitioners represented a different date, noting that they were required to comply with the Sanctions Order by Monday, March 16, 2015. (Pet'rs' Ex. 3 at 2:23-3:1 ("Your Honor, as a situation where obviously from a timing standpoint we had to file this now because the order is going to take effect or require action by - - the 16th.").)

Jacobs objects to Petitioners' tactics. NRAP 21(a) imposes several procedural requirements to invoke this Court's original jurisdiction by way of a

¹ (*Compare* Morris Decl. ¶ 7, March 16, 2015.) Petitioner's attempt to rationalize non-compliance with NRAP 27(e) – claiming that the filing of a motion to stay with the District Court satisfied their requirements to give advance notice – is also inaccurate. Again, before the District Court, Petitioners were claiming that they needed the stay by March 16.

writ petition, none of which are satisfied by Petitioners' so-called Motion. There is no affidavit of a party beneficially interested, nor does it include the documentation underlying the District Court's 41-page Decision and Order. *See* NRAP 21(a)(4) (requiring petitioner provide copies of "parts of the record which may be essential to an understanding of the matter set forth in the petition"); NRAP 21(a)(3), (5).

DATED this 17th day of March, 2015.

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By: /s/ Todd L. Bice
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC, and that on this 17th day of March, 2015, I electronically filed and served a true and correct copy of the above and foregoing **REAL PARTY IN INTEREST STEVEN C. JACOBS' NOTICE OF INTENT TO OPPOSE PETITIONERS' EMERGENCY MOTION TO STAY UNDER NRAP 27(e)** properly addressed to the following:

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