

Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

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DATED: January 28, 2013

HOLLAND & HART LLP

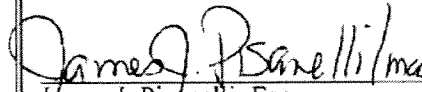
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Attorneys for Defendant Sands China Ltd.

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To the extent not produced in response to the preceding requests, please identify and produce all documents, memoranda, mails, and/or other correspondence that reflect services performed by LVSC (including LVSC's executives and/or employees and/or consultants and/or agents) for or on behalf of Sands China, during the time period of January 1, 2009, to October 20, 2010, including, but not limited to, Yvonne Mao, directions given to Mr. Yueng and/or Eric Chu relating to Hengquin Island, Chu Kong Shipping ("CKS"), the basketball team, the Adelson Center in Beijing, and investigations related to the same; negotiations with Four Seasons, Sheraton and Shangri-La; bonus and remuneration plans; outside counsel's review of Leonel Alves, Foreign Corrupt Practices Act issues and his suitability to serve as counsel for Sands China Limited; International Risk reports on Cheung Chi Tai, Charles Heung, and others commissioned in response to the Reuters' article alleging organized crime; and collection activities relating to patrons and junkets with large outstanding debts due Sands China and/or its subsidiaries.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request on the grounds that it far exceeds the scope of discovery authorized by the Court and instead appears calculated to obtain discovery concerning the merits of this case, rather than personal jurisdiction, contrary to the stay that has been imposed by the Supreme Court. SCL further objects to this request as beyond the scope of discovery authorized by the Court and irrelevant, unduly burdensome, and not reasonable calculated to lead to the discovery of admissible evidence insofar as it is not limited to services that occurred in Nevada. SCL also objects to the phrase "for or on behalf of Sands China" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those

1 documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this
2 request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the
3 request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his
4 arguments on personal jurisdiction. SCL also objects to the terms "reflect," "services," and
5 "performed by" because those terms are overbroad, vague, and ambiguous.

6 SCL also objects to this request to the extent it calls for the disclosure of information
7 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
8 and any other privileges by statute, common law, or otherwise.

9 SCL further objects to this request to the extent that it seeks documents and information
10 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
11 courts and not calculated to lead to the discovery of admissible evidence.

12 Subject to and without waiver of the foregoing objections (including the Preliminary
13 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
14 as:

Starting Bates	Ending Bates
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SCL00100107	SCL00100108
SCL00100109	SCL00100111
SCL00100114	SCL00100114
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REQUEST FOR PRODUCTION NO. 12:

Please identify and produce all documents, memoranda, emails, and/or other correspondence that reflect services performed by LVSC (including LVSC's executives and/or employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or concerning recruitment and interviewing of potential Sands China executives, during the time period of January 1, 2009, to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to the phrase "for or on behalf of Sands China" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces

1 documents in response to this request, SCL is not making any admission as to the legal
2 significance of those documents and specifically denies that LVSC acted as the agent for SCL.
3 SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all
4 documents" responsive to the request, rather than an illustrative subset of documents that are
5 sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL further objects to the
6 terms "reflect," "services performed by LVSC," "related to," "concerning," and "recruitment and
7 interviewing of potential Sands China executives" because those terms are overbroad, vague, and
8 ambiguous.

9 SCL also objects to this request to the extent it calls for the disclosure of information
10 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
11 and any other privileges by statute, common law, or otherwise.

12 SCL further objects to this request to the extent that it seeks documents and information
13 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
14 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
15 objects to this Request because any work performed by LVSC relating to SCL's operations in
16 Macau is insufficient to establish that personal jurisdiction exists over SCL.

17 Subject to and without waiver of the foregoing objections (including the Preliminary
18 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
19 as:

Beginning Bates	Ending Bates
SCL00100145	SCL00100150
SCL00100151	SCL00100152
SCL00101548	SCL00101549
SCL00102118	SCL00102118
SCL00103995	SCL00103995
SCL00103996	SCL00103996
SCL00103997	SCL00103997
SCL00104549	SCL00104549
SCL00107754	SCL00107755
SCL00107756	SCL00107764
SCL00108392	SCL00108392
SCL00108397	SCL00108397
SCL00108398	SCL00108398

1	SCL00108648	SCL00108649
	SCL00108650	SCL00108651
2	SCL00108652	SCL00108653
	SCL00108936	SCL00108937
3	SCL00111465	SCL00111467
	SCL00111468	SCL00111468
4	SCL00111563	SCL00111564
	SCL00111565	SCL00111566
5	SCL00111567	SCL00111583
	SCL00112545	SCL00112549
6	SCL00112659	SCL00112661
	SCL00112662	SCL00112663
7	SCL00112664	SCL00112665
	SCL00112752	SCL00112752
8	SCL00112753	SCL00112760
	SCL00112763	SCL00112770
9	SCL00112811	SCL00112811
	SCL00112812	SCL00112823
10	SCL00112846	SCL00112846
	SCL00112912	SCL00112912
11	SCL00112914	SCL00112921
	SCL00112931	SCL00112931
12	SCL00113065	SCL00113065
	SCL00113066	SCL00113066
13	SCL00113109	SCL00113116
	SCL00115152	SCL00115152
14	SCL00115153	SCL00115155
	SCL00115156	SCL00115156
15	SCL00115157	SCL00115157
	SCL00115220	SCL00115222
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	SCL00118165	SCL00118168
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	SCL00118689	SCL00118692
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	SCL00120575	SCL00120575
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	SCL00120931	SCL00120944
20	SCL00121015	SCL00121018
	SCL00121094	SCL00121094
21	SCL00121095	SCL00121095
	SCL00121097	SCL00121097
22	SCL00121099	SCL00121101
	SCL00121286	SCL00121286

28

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 Las Vegas, Nevada 89134

1	SCL00121287	SCL00121300
2	SCL00121301	SCL00121301
3	SCL00121302	SCL00121315
4	SCL00121316	SCL00121316
5	SCL00121317	SCL00121328
6	SCL00121329	SCL00121329
7	SCL00121330	SCL00121341
8	SCL00121342	SCL00121342
9	SCL00121343	SCL00121354
10	SCL00121355	SCL00121355
11	SCL00121356	SCL00121367
12	SCL00121368	SCL00121368
13	SCL00121369	SCL00121380
14	SCL00121382	SCL00121393
15	SCL00121394	SCL00121394
16	SCL00121395	SCL00121406
17	SCL00121407	SCL00121407
18	SCL00121408	SCL00121419
19	SCL00121420	SCL00121420
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21	SCL00121433	SCL00121446
22	SCL00121823	SCL00121824
23	SCL00121825	SCL00121826
24	SCL00121827	SCL00121828
25	SCL00122542	SCL00122543
26	SCL00122735	SCL00122735
27	SCL00122736	SCL00122736
28	SCL00122737	SCL00122743
	SCL00126126	SCL00126127
	SCL00126128	SCL00126128
	SCL00126129	SCL00126130
	SCL00128088	SCL00128088
	SCL00128089	SCL00128098
	SCL00128100	SCL00128106
	SCL00128149	SCL00128150
	SCL00128160	SCL00128166
	SCL00128176	SCL00128193
	SCL00128212	SCL00128229
	SCL00100016	SCL00100016

REQUEST FOR PRODUCTION NO. 13:

Please identify and produce all documents, memoranda, emails, and/or other correspondence that reflect services performed by LVSC (including LVSC's executives and/or employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or

1 concerning marketing of Sands China properties, including its frequency program, the issuance of
2 "Chairman's Club" cards by Sheldon G. Adelson to Cheung Chi Tai, Jack Lam and others, credit
3 limits, floor layouts, the removal of Cheung Chi Tai, Charles Heung Wah Keung, and others from
4 the Guarantor list of VIP promoters, nightclub operations and approval, including but not limited
5 to Lotus Night Club, and/or the hiring of outside consultants, during the time period of January 1,
6 2009, to October 20, 2010.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

8 SCL incorporates the Preliminary Statement and each of the General Objections as though
9 fully set forth herein. SCL objects to this request on the grounds that it exceeds the scope of
10 discovery authorized by the Court and appears calculated to obtain merits discovery on the
11 pretense of seeking jurisdictional discovery, contrary to the stay imposed by the Supreme Court.
12 SCL further objects to the phrase "for or on behalf of Sands China" on the grounds that it is
13 vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in
14 response to this request, SCL is not making any admission as to the legal significance of those
15 documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this
16 request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the
17 request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his
18 arguments on personal jurisdiction. SCL also objects to the terms "reflect," "services,"
19 "consultants," "agents," "related to," "concerning marketing of Sands China properties,"
20 "frequency program," "credit limits," "floor layouts," and "hiring of outside consultants," because
21 those terms are overbroad, vague, and ambiguous.

22 SCL also objects to this request to the extent it calls for the disclosure of information
23 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
24 and any other privileges by statute, common law, or otherwise.

25 SCL further objects to this request to the extent that it seeks documents and information
26 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
27 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
28 notes that any work by LVSC in Nevada relating to SCL's operations in Macau is insufficient to

1 establish that personal jurisdiction exists over SCL.

2 Subject to and without waiver of the foregoing objections (including the Preliminary
3 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
4 as:

Beginning Bates	Ending Bates
SCL00100120	SCL00100135
SCL00102453	SCL00102460
SCL00104695	SCL00104725
SCL00107920	SCL00107939
SCL00108488	SCL00108488
SCL00108582	SCL00108583
SCL00108584	SCL00108584
SCL00108718	SCL00108718
SCL00109091	SCL00109091
SCL00109092	SCL00109106
SCL00109107	SCL00109107
SCL00109108	SCL00109108
SCL00109114	SCL00109114
SCL00109133	SCL00109133
SCL00109134	SCL00109134
SCL00112130	SCL00112130
SCL00112131	SCL00112145
SCL00112146	SCL00112151
SCL00112152	SCL00112157
SCL00112722	SCL00112725
SCL00113037	SCL00113040
SCL00113165	SCL00113167
SCL00113631	SCL00113631
SCL00113632	SCL00113668
SCL00114379	SCL00114415
SCL00114525	SCL00114525
SCL00115135	SCL00115137
SCL00115143	SCL00115145
SCL00115149	SCL00115149
SCL00115212	SCL00115214
SCL00115215	SCL00115217
SCL00115247	SCL00115249
SCL00115250	SCL00115252
SCL00115253	SCL00115254
SCL00115255	SCL00115255
SCL00115256	SCL00115290

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9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

1	SCL00115528	SCL00115529
	SCL00115530	SCL00115530
2	SCL00115642	SCL00115645
3	SCL00115646	SCL00115648
	SCL00115650	SCL00115652
4	SCL00115653	SCL00115654
	SCL00115655	SCL00115655
5	SCL00115729	SCL00115742
6	SCL00115744	SCL00115745
	SCL00115748	SCL00115749
7	SCL00115822	SCL00115824
8	SCL00115875	SCL00115877
	SCL00115963	SCL00115964
9	SCL00115984	SCL00115991
10	SCL00116169	SCL00116169
	SCL00116189	SCL00116192
11	SCL00116237	SCL00116238
	SCL00116290	SCL00116326
12	SCL00116617	SCL00116620
13	SCL00116751	SCL00116753
	SCL00116754	SCL00116755
14	SCL00118134	SCL00118149
15	SCL00121830	SCL00121830
	SCL00122388	SCL00122388
16	SCL00122389	SCL00122392
	SCL00122394	SCL00122395
17	SCL00122397	SCL00122397
18	SCL00123333	SCL00123333
	SCL00123925	SCL00123940
19	SCL00123941	SCL00123941
20	SCL00123942	SCL00123956
	SCL00123957	SCL00123962
21	SCL00123963	SCL00123968
	SCL00123979	SCL00123980
22	SCL00123981	SCL00123981
23	SCL00123982	SCL00123987
	SCL00126151	SCL00126152
24	SCL00126262	SCL00126313
	SCL00126339	SCL00126340
25	SCL00126450	SCL00126501
26	SCL00126807	SCL00126807
27	SCL00127186	SCL00127189

1 **REQUEST FOR PRODUCTION NO. 14:**

2 Please identify and produce all documents, memoranda, email; and/or other
3 correspondence that reflect services performed by LVSC or the involvement of LVSC executives
4 (including LVSC's executives and/or employees and/or consultants and/or agents) for or on
5 behalf of Sands China, related to and/or concerning negotiation of a possible joint venture
6 between Sands China and Harrah's, during the time period of January 1, 2009, to October 20,
7 2010 if such documents exist.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

9 SCL incorporates the Preliminary Statement and each of the General Objections as though
10 fully set forth herein. SCL objects to the phrase "for or on behalf of Sands China" on the grounds
11 that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces
12 documents in response to this request, SCL is not making any admission as to the legal
13 significance of those documents and specifically denies that LVSC acted as the agent for SCL.
14 SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all
15 documents" responsive to the request, rather than an illustrative subset of documents that are
16 sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the
17 terms "reflect," "services performed by LVSC," "involvement of LVSC executives," "related to,"
18 "concerning," "consultants," and "agents" because those terms are overbroad, vague, and
19 ambiguous.

20 SCL also objects to this request to the extent it calls for the disclosure of information
21 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
22 and any other privileges by statute, common law, or otherwise.

23 SCL further objects to this request to the extent that it seeks documents and information
24 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
25 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
26 notes that any negotiations that occurred in Nevada for business or actions to be taken and
27 implemented in Macau are insufficient to establish that personal jurisdiction exists over SCL.

28 Subject to and without waiver of the foregoing objections (including the Preliminary
Page 106 of 231

Statement and General Objections), please refer to the documents produced by SCL Bates labeled as:

Beginning Bates	Ending Bates
SCL00100220	SCL00100220
SCL00100251	SCL00100251
SCL00100265	SCL00100266
SCL00100267	SCL00100268
SCL00100317	SCL00100317
SCL00100318	SCL00100318
SCL00100445	SCL00100528
SCL00101035	SCL00101035
SCL00101506	SCL00101507
SCL00101511	SCL00101514
SCL00101815	SCL00101815
SCL00101816	SCL00101816
SCL00102035	SCL00102036
SCL00102074	SCL00102079
SCL00102091	SCL00102106
SCL00102161	SCL00102161
SCL00102162	SCL00102162
SCL00102185	SCL00102188
SCL00102344	SCL00102346
SCL00102353	SCL00102353
SCL00102421	SCL00102423
SCL00102445	SCL00102445
SCL00102660	SCL00102662
SCL00102983	SCL00102984
SCL00103425	SCL00103426
SCL00104006	SCL00104008
SCL00108500	SCL00108503
SCL00108509	SCL00108511
SCL00108698	SCL00108699
SCL00112807	SCL00112808
SCL00112824	SCL00112824
SCL00113380	SCL00113381
SCL00113445	SCL00113445
SCL00113446	SCL00113446
SCL00113447	SCL00113447
SCL00113448	SCL00113450
SCL00113451	SCL00113453
SCL00113498	SCL00113502

1	SCL00113503	SCL00113505
2	SCL00113506	SCL00113507
3	SCL00113550	SCL00113550
4	SCL00113551	SCL00113553
5	SCL00113606	SCL00113610
6	SCL00113611	SCL00113614
7	SCL00113615	SCL00113617
8	SCL00113960	SCL00113962
9	SCL00113963	SCL00113965
10	SCL00113985	SCL00113986
11	SCL00113987	SCL00113989
12	SCL00114279	SCL00114280
13	SCL00114284	SCL00114287
14	SCL00114288	SCL00114292
15	SCL00114330	SCL00114331
16	SCL00114335	SCL00114335
17	SCL00114336	SCL00114337
18	SCL00114338	SCL00114340
19	SCL00114341	SCL00114341
20	SCL00114436	SCL00114436
21	SCL00114442	SCL00114445
22	SCL00117515	SCL00117516
23	SCL00117517	SCL00117519
24	SCL00117532	SCL00117534
25	SCL00118202	SCL00118202
26	SCL00118203	SCL00118204
27	SCL00118217	SCL00118217
28	SCL00118345	SCL00118346
	SCL00118348	SCL00118355
	SCL00118611	SCL00118612
	SCL00120590	SCL00120593
	SCL00120594	SCL00120596
	SCL00120597	SCL00120599
	SCL00120600	SCL00120601
	SCL00120602	SCL00120603
	SCL00121137	SCL00121139
	SCL00121140	SCL00121141
	SCL00121224	SCL00121226
	SCL00121227	SCL00121229
	SCL00121235	SCL00121237
	SCL00121540	SCL00121541
	SCL00123464	SCL00123464

SCL00125492	SCL00125495
SCL00127008	SCL00127008

REQUEST FOR PRODUCTION NO. 15:

Please identify and produce all documents, memoranda, emails, and/or other correspondence that reflect services performed by LVSC (including LVSC's executives and/or employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or concerning negotiation of the sale of Sands China's interest in sites to Stanley Ho's company, SJM, during the time period of January 1, 2009, to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to the phrase "for or on behalf of Sands China" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. In particular, SCL objects to the terms "related to," "concerning," "reflect services performed by LVSC," "consultants," "agents," and "Sands China's interest in" because those terms are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege and any other privileges by statute, common law, or otherwise.

SCL further objects to this request to the extent that it seeks documents and information that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district courts and not calculated to lead to the discovery of admissible evidence. In that regard, SCL notes that any negotiations that occurred in Nevada for business or actions to be taken and implemented in Macau are insufficient to establish that personal jurisdiction exists over SCL.

1 Subject to and without waiver of the foregoing objections (including the Preliminary
2 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
3 as:

Beginning Bates	Ending Bates
SCL00100336	SCL00100374
SCL00100375	SCL00100408
SCL00100409	SCL00100426
SCL00100445	SCL00100528
SCL00100896	SCL00100928
SCL00100957	SCL00101033
SCL00101137	SCL00101293
SCL00101325	SCL00101385
SCL00106808	SCL00107415
SCL00113215	SCL00113217
SCL00120002	SCL00120485
SCL00122969	SCL00122982

12 **REQUEST FOR PRODUCTION NO. 16:**

13 Please identify and produce all documents that reflect communications by and between
14 Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's
15 behalf) and BASE Entertainment during the time period of January 1, 2009 to October 20, 2010.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

17 SCL incorporates the Preliminary Statement and each of the General Objections as though
18 fully set forth herein. SCL objects to this request as beyond the scope of discovery authorized by
19 the Court insofar as it is not limited to communications that occurred in Nevada. SCL objects to
20 the phrase "for or on Sands China's behalf" on the grounds that it is vague, ambiguous, and calls
21 for a legal conclusion. "To the extent that it produces documents in response to this request, SCL
22 is not making any admission as to the legal significance of those documents and specifically
23 denies that LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and
24 unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an
25 illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal
26 jurisdiction. SCL also objects to the terms "reflect," and "communications" because those terms
27 are overbroad, vague, and ambiguous.

1 SCL also objects to this request to the extent it calls for the disclosure of information
2 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
3 and any other privileges by statute, common law, or otherwise.

4 SCL further objects to this request to the extent that it seeks documents and information
5 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
6 courts and not calculated to lead to the discovery of admissible evidence. In that regard, SCL
7 notes that any communications between SCL or LVSC, on the one hand, and Base Entertainment,
8 on the other, relating to SCL's business in Macau are insufficient to establish that personal
9 jurisdiction exists over SCL.

10 Subject to and without waiver of the foregoing objections (including the Preliminary
11 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
12 as:

Beginning Bates	Ending Bates
SCL00100240	SCL00100240
SCL00100247	SCL00100247
SCL00107769	SCL00107771
SCL00107796	SCL00107797
SCL00108512	SCL00108512
SCL00108518	SCL00108518
SCL00108692	SCL00108697
SCL00108721	SCL00108721
SCL00108722	SCL00108723
SCL00108724	SCL00108726
SCL00108727	SCL00108728
SCL00108731	SCL00108731
SCL00108917	SCL00108917
SCL00108924	SCL00108930
SCL00109478	SCL00109491
SCL00112806	SCL00112806
SCL00112829	SCL00112829
SCL00113387	SCL00113389
SCL00113554	SCL00113555
SCL00113556	SCL00113559
SCL00113560	SCL00113563
SCL00113564	SCL00113565
SCL00113618	SCL00113619
SCL00113669	SCL00113669

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2	SCL00114023	SCL00114023
3	SCL00114310	SCL00114310
4	SCL00114311	SCL00114314
5	SCL00114315	SCL00114315
6	SCL00114316	SCL00114317
7	SCL00114332	SCL00114333
8	SCL00114334	SCL00114334
9	SCL00114561	SCL00114561
10	SCL00114639	SCL00114642
11	SCL00117220	SCL00117224
12	SCL00117235	SCL00117235
13	SCL00117241	SCL00117241
14	SCL00117513	SCL00117513
15	SCL00117514	SCL00117514
16	SCL00117520	SCL00117522
17	SCL00117535	SCL00117537
18	SCL00117650	SCL00117775
19	SCL00118118	SCL00118118
20	SCL00118191	SCL00118192
21	SCL00118193	SCL00118193
22	SCL00118198	SCL00118199
23	SCL00118200	SCL00118200
24	SCL00118221	SCL00118222
25	SCL00118366	SCL00118368
26	SCL00118369	SCL00118370
27	SCL00118371	SCL00118372
28	SCL00118382	SCL00118382
	SCL00118454	SCL00118454
	SCL00121142	SCL00121150
	SCL00121151	SCL00121158
	SCL00121161	SCL00121165
	SCL00121173	SCL00121175
	SCL00121176	SCL00121178
	SCL00121213	SCL00121220
	SCL00121259	SCL00121266
	SCL00121267	SCL00121275
	SCL00121282	SCL00121285
	SCL00122744	SCL00122747
	SCL00122760	SCL00122765
	SCL00123978	SCL00123978
	SCL00126779	SCL00126780
	SCL00126781	SCL00126782
	SCL00126783	SCL00126783

SCL00126784	SCL00126784
SCL00126994	SCL00126995
SCL00126996	SCL00126997
SCL00126998	SCL00126998
SCL00128154	SCL00128156
SCL00129889	SCL00129889

REQUEST FOR PRODUCTION NO. 17:

Please identify and produce all documents that reflect communications by and between Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's behalf) and Cirque de Soleil during the time period of January 1, 2009 to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request as beyond the scope of discovery authorized by the Court insofar as it is not limited to communications that occurred in Nevada. SCL objects to the phrase "for or on Sands China's behalf" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the terms "reflect," and "communications" because those terms are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege and any other privileges by statute, common law, or otherwise.

SCL further objects to this request to the extent that it seeks documents and information that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL notes any communications between SCL or LVSC, on the one hand, and Cirque de Soleil, on the other, relating to business to be implemented in Macau are insufficient to establish that personal

jurisdiction exists over SCL.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), please refer to the documents produced by SCL Bates labeled as:

Beginning Bates	Ending Bates
SCL00100336	SCL00100374
SCL00100409	SCL00100426
SCL00100445	SCL00100528
SCL00100957	SCL00101033
SCL00101583	SCL00101583
SCL00102045	SCL00102045
SCL00102074	SCL00102079
SCL00102082	SCL00102090
SCL00102605	SCL00102607
SCL00102609	SCL00102610
SCL00102720	SCL00102728
SCL00102902	SCL00102966
SCL00103393	SCL00103393
SCL00103394	SCL00103411
SCL00103418	SCL00103420
SCL00103580	SCL00103613
SCL00104569	SCL00104694
SCL00104726	SCL00105165
SCL00106808	SCL00107415
SCL00107772	SCL00107774
SCL00107801	SCL00107801
SCL00107802	SCL00107805
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SCL00108077	SCL00108157
SCL00108158	SCL00108238
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SCL00129694	SCL00129699

REQUEST FOR PRODUCTION NO. 18:

Please identify and produce all documents that reflect communications by and between Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's behalf) and Bally Technologies, Inc., during the time period of January 1, 2009 to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request as beyond the scope of discovery authorized by the Court insofar as it is not limited to communications that occurred in Nevada. SCL objects to the phrase "for or on Sands China's behalf" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the terms "reflect," and "communications," because those terms

are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege and any other privileges by statute, common law, or otherwise.

SCL further objects to this request to the extent that it seeks documents and information that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL notes that communications between SCL or LVSC, on the one hand, and Bally Technologies, Inc., on the other, relating to business to be implemented in Macau are insufficient to establish that personal jurisdiction exists over SCL.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), please refer to the documents produced by SCL Bates labeled as:

Beginning Bates	Ending Bates
SCL00108452	SCL00108456
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SCL00108462	SCL00108466
SCL00108467	SCL00108471
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SCL00129785	SCL00129788
SCL00100033	SCL00100038

Beginning Bates	Ending Bates
SCL00100039	SCL00100044
SCL00100045	SCL00100050
SCL00100051	SCL00100051

REQUEST FOR PRODUCTION NO. 19:

Please identify and produce all documents that reflect communications by and between Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's behalf) and Harrah's during the time period of January 1, 2009 to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request as beyond the scope of discovery authorized by the Court insofar as it is not limited to communications that occurred in Nevada. SCL objects to the phrase "for or on Sands China's behalf" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the terms "reflect, and "communications," because those terms are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege and any other privileges by statute, common law, or otherwise.

SCL further objects to this request to the extent that it seeks documents and information that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL notes that any communications between SCL and/or LVSC, on the one hand, and Harrah's, on the other, relating to SCL, business to be implemented in Macau are insufficient to establish that personal jurisdiction exists over SCL.

1 Subject to and without waiver of the foregoing objections (including the Preliminary
2 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
3 as:

Beginning Bates	Ending Bates
SCL00100445	SCL00100528
SCL00108500	SCL00108503
SCL00108509	SCL00108511
SCL00108698	SCL00108699
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REQUEST FOR PRODUCTION NO. 20:

Please identify and produce all documents that reflect communications by and between Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's behalf) and any potential lenders for the underwriting of Parcels 5 and 6, during the time period of January 1, 2009 to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request as beyond the scope of discovery authorized by the Court insofar as it is not limited to communications that occurred in Nevada. SCL objects to the phrase "for or on Sands China's behalf" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the terms "reflect," "communications," "potential lenders," and "underwriting of Parcels 5 and 6" because those terms are overbroad, vague, and ambiguous.

1 SCL also objects to this request to the extent it calls for the disclosure of information
2 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
3 and any other privileges by statute, common law, or otherwise.

4 SCL further objects to this request to the extent that it seeks documents and information
5 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
6 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
7 notes that any efforts in Nevada to provide funding or acquire financing for SCL's business
8 activities to be implemented in Macau are insufficient to establish that personal jurisdiction exists
9 over SCL.

10 Subject to and without waiver of the foregoing objections (including the Preliminary
11 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
12 as:

Beginning Bates	Ending Bates
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1	SCL00123452	SCL00123452
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1	SCL00127016	SCL00127016
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REQUEST FOR PRODUCTION NO. 21:

Please identify and produce all documents that reflect communications by and between Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's behalf) and site designers, developers, and specialists for Parcels 5 and 6, during the time period of January 1, 2009 to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request as beyond the scope of discovery authorized by the Court insofar as it is not limited to communications that occurred in Nevada. SCL objects to the phrase "for or on Sands China's behalf" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that. LVSC acted as the agent for SCL. SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the terms "reflect," "communications," "site designers," "developers," "specialists," and "Parcels 5 and 6" because those terms are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege

1 and any other privileges by statute, common law, or otherwise.

2 SCL further objects to this request to the extent that it seeks documents and information
3 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
4 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
5 notes that any actions taken by SCL or LVSC in Nevada for SCL business to be implemented in
6 Macau is insufficient to establish that personal jurisdiction exists over SCL.

7 Subject to and without waiver of the foregoing objections (including the Preliminary
8 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
9 as:

Beginning Bates	Ending Bates
SCL00100105	SCL00100106
SCL00100107	SCL00100108
SCL00100109	SCL00100111
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	SCL00104119	SCL00104119
	SCL00104120	SCL00104134
	SCL00104136	SCL00104147

1 responsive documents far outweighs the probative value, if any, of those documents. SCL further
2 objects to this request on the ground that the phrase "related to" is vague, ambiguous, and
3 incapable of precise definition.

4 SCL also objects to this request to the extent it calls for the disclosure of information
5 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
6 and any other privileges by statute, common law, or otherwise.

7 SCL further objects to this request to the extent that it seeks documents and information
8 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
9 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
10 notes that actions taken and decisions implemented outside of Nevada by Mr. Leven in
11 connection with his work with SCL are not relevant to whether a Nevada court has personal
12 jurisdiction over SCL.

13 Subject to and without waiver of the foregoing objections (including the Preliminary
14 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
15 as:

Beginning Bates	Ending Bates
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SCL00100013	SCL00100013
SCL00100014	SCL00100015

REQUEST FOR PRODUCTION NO. 7:

Please identify and produce all documents that reflect the location of the negotiation and execution of agreements related to the funding of Sands China, during the time period of January 1, 2009, to October 20, 2010, including, but not limited to, the raising of pre-IPO funds, the IPO, underwriting for Sites 5 & 6, loan refinancing and/or covenant relief/term modifications pre-IPO, the services of Bank of China to bring high net worth investors/gamblers to buy the Four Seasons Serviced Apartments, and the written proposal of Leonel Alves to obtain strata-title for the Four Seasons Apartments involving Beijing government officials.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request on the grounds that it is overbroad, unduly burdensome, and not reasonable calculated to lead to the discovery of admissible evidence. SCL further objects to this request on the ground that it exceeds the scope of discovery authorized by the Court insofar as it is not limited to documents that reflect negotiations and execution of the agreements for the funding of SCL that occurred, in whole or in part, in Nevada. SCL also objects to the terms "reflect," "location of the negotiation and execution of agreements," "related to," "funding," and "Sites 5 & 6" because those terms are overbroad, vague, and ambiguous. SCL construes the terms "Sites 5 & 6" to refer to the properties known as Parcels 5 & 6 in the Cotai Strip, Macau.

SCL also objects to this request to the extent it calls for the disclosure of information

protected from disclosure under the attorney-client privilege, the attorney work-product privilege and any other privileges by statute, common law, or otherwise.

SCL further objects to this request to the extent that it seeks documents and information that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district courts and not calculated to lead to the discovery of admissible evidence. In that regard, SCL notes that efforts in Nevada to provide funding or acquire financing for SCL's business activities to be implemented in Macau are insufficient to establish that personal jurisdiction exists over SCL.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), please refer to the documents produced by SCL Bates labeled as:

Beginning Bates	Ending Bates
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SCL00129399	SCL00129414
SCL00129702	SCL00129706
SCL00129710	SCL00129715
SCL00129716	SCL00129730
SCL00129812	SCL00129826

REQUEST FOR PRODUCTION NO. 8:

Please identify and produce all contracts/agreements that Sands China (and/or any individual and/or entity for or on behalf of Sands China) entered into with individuals and/or entities based in or doing business in Nevada, including, but not limited to, any agreements with BASE Entertainment and Bally Technologies, Inc., construction, design, signage, retail mall operations, and/or banking during the time period of January 1, 2009, to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to the phrase “for or on behalf of Sands China” on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL further objects to this request as overbroad, unduly burdensome, and beyond the scope of discovery authorized by the Court insofar as it purports to require SCL to search for and produce agreements with individuals, as opposed to entities. SCL also objects to the terms and phrases “based in . . . Nevada,” and “construction, design, signage, retail mall operations, and/or banking,” because those terms are overbroad, vague, ambiguous, and force SCL to speculate as to the meaning of this request. SCL construes “based in” to refer to a business’s primary place of business.

SCL also objects to this request to the extent it calls for the disclosure of information

1 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
2 and any other privileges by statute, common law, or otherwise.

3 SCL further objects to this request to the extent that it seeks documents and information
4 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
5 courts and not calculated to lead to the discovery of admissible evidence. In that regard, SCL
6 notes that SCL's contracts with any individuals or entities for business to be implemented in
7 Macau are insufficient to establish personal jurisdiction over SCL.

8 Subject to and without waiver of the foregoing objections (including the Preliminary
9 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
10 as:

Beginning Bates	Ending Bates
SCL000668	SCL000668
SCL00102416	SCL00102420
SCL00102994	SCL00102995
SCL00103393	SCL00103393
SCL00103394	SCL00103411
SCL00103413	SCL00103417
SCL00103418	SCL00103420
SCL00103421	SCL00103421
SCL00121477	SCL00121539

17
18 **REQUEST FOR PRODUCTION NO. 9:**

19 Please identify and produce all documents that reflect work Robert G. Goldstein
20 performed for or On behalf of Sands China, during the time period of January 1, 2009, to October
21 20, 2010, including global gaming and/or international player development efforts, such as active
22 recruitment of VIP players to share between and among LVSC and Sands China properties,
23 details concerning trips with Larry Chu into China to recruit new VIP players, dinners and/or
24 meetings with Cheung Chi Tai, Charles Heung Wah Keung, and/or other VIP promoters, players
25 funding, the transfer of players funds, and the use of Venetian Marketing Services Limited
26 ("VMSL") and/or other entities to secure players and facilitate money transfers.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

28 SCL incorporates the Preliminary Statement and each of the General Objections as though
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1 fully set forth herein. SCL objects to this request on the grounds that it exceeds the scope of
2 discovery authorized by the Court insofar as it is not limited to documents reflecting global
3 gaming and/or international player development efforts by Mr. Goldstein. SCL objects to the
4 phrase "for or on behalf of Sands China" on the grounds that it is vague, ambiguous, and calls for
5 a legal conclusion. To the extent that it produces documents in response to this request, SCL is
6 not making any admission as to the legal significance of those documents and specifically denies
7 that LVSC acted as the agent for SCL. SCL further objects to this request as overbroad and
8 unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an
9 illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal
10 jurisdiction. SCL also objects to the term and phrases "global gaming and/or international player
11 development efforts," "active recruitment of VIP players to share between and among LVSC and
12 Sands China properties," "new VIP players," and "players funding," because those terms are
13 overbroad, vague, and ambiguous.

14 SCL also objects to this request to the extent it calls for the disclosure of information
15 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
16 and any other privileges by statute, common law, or otherwise.

17 SCL further objects to this request to the extent that it seeks documents and information
18 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
19 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
20 notes that Mr. Goldstein's work (if any) relating to SCL's business in Macau is insufficient to
21 establish that personal jurisdiction exists over SCL.

22 Subject to and without waiver of the foregoing objections (including the Preliminary
23 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
24 as:

Beginning Bates	Ending Bates
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SCL00104569	SCL00104694
SCL00108472	SCL00108473
SCL00109175	SCL00109176

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SCL00122757	SCL00122757
SCL00129920	SCL00129928

REQUEST FOR PRODUCTION NO. 10:

Please identify and produce all agreements for shared services between and among LVSC and Sands China or any of its subsidiaries, including, but not limited to, (1) procurement services agreements; (2) agreements for the sharing of private jets owned or made available by LVSC; and (3) trademark license agreements, during the time period of January 1, 2009, to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request on the grounds that it is overbroad, vague, ambiguous, and unduly burdensome. In particular, SCL objects to the term "shared services" because the term is overbroad, vague, and ambiguous. For the purposes of this Request, SCL construes the term "shared services" to refer to contracts entered into by SCL and/or LVSC in connection with the November 8, 2009 Shared Services Agreement.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege

1 and any other privileges by statute, common law, or otherwise.

2 SCL further objects to this request to the extent that it seeks documents and information
3 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
4 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
5 notes that such contracts between a parent and subsidiary are insufficient to establish that personal
6 jurisdiction exists over SCL.

7 Subject to and without waiver of the foregoing objections (including the Preliminary
8 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
9 as:

Beginning Bates	Ending Bates
SCL000442	SCL000461
SCL000462	SCL000481
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SCL00118527	SCL00118528
SCL00122784	SCL00122786
SCL00127103	SCL00127104
SCL00128416	SCL00128440
SCL00100017	SCL00100029

16 **REQUEST FOR PRODUCTION NO. 11:**

17 Please identify and produce all documents, memoranda, emails, and/or other
18 correspondence that reflect services performed by LVSC (including LVSC's executives and/or
19 employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or
20 concerning site design and development oversight of Parcels 5 and 6, during the time period of
21 January 1, 2009, to October 20, 2010.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

23 SCL incorporates the Preliminary Statement and each of the General Objections as though
24 fully set forth herein. SCL objects to the phrase "for or on behalf of Sands China" on the grounds
25 that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces
26 documents in response to this request, SCL is not making any admission as to the legal
27 significance of those documents and specifically denies that LVSC acted as the agent for SCL.
28 SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all

documents” responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL further objects to the terms “reflect,” “services performed by LVSC,” “consultants,” “agents,” “related to,” “concerning site design,” “development oversight,” and “Parcels 5 and 6” because those terms are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information protected from disclosure under the attorney-client privilege, the attorney work-product privilege and any other privileges by statute, common law, or otherwise.

SCL further objects to this request to the extent that it seeks documents and information that are not relevant to the determination of personal jurisdiction over SCL in Nevada’s district courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL objects to this Request because any work by LVSC in Nevada relating to SCL’s operations in Macau is insufficient to establish that personal jurisdiction exists over SCL.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), SCL states that it will produce non-privileged documents sufficient to show work performed in Nevada relating to site design and development of Parcels 5 & 6, to the extent they can be located through reasonable diligence, during the time period of January 1, 2009 to October 20, 2010.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), please refer to the documents produced by SCL Bates labeled as:

Beginning Bates	Ending Bates
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SCL00100184	SCL00100189

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	SCL00121677	SCL00121678

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IN THE SUPREME COURT OF THE STATE OF NEVADA

SANDS CHINA LTD., a Cayman Islands
corporation,

Petitioner,

vs.

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

Respondents,

and

STEVEN C. JACOBS,

Real Party in Interest.

Electronically Filed
Case Number: 2015-0828
Mar: 23/2015 08:28 a.m.
Tracie K. Lindeman
Clerk of Supreme Court
District Court Case Number
A627691-B

**APPENDIX TO
PETITION FOR WRIT OF
PROHIBITION OR
MANDAMUS
RE MARCH 6, 2015
SANCTIONS ORDER**

**Volume XVI of XXXIII
(PA3096 – 3335)**

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CERTIFICATE OF SERVICE

Pursuant to Nev. R. App. P. 25, I certify that I am an employee of MORRIS LAW GROUP; that, in accordance therewith, I caused a copy of the **APPENDIX TO PETITION FOR WRIT OF PROHIBITION OR MANDAMUS RE MARCH 6, 2015 SANCTIONS ORDER Volume XVI of XXXIII (PA3096 – 3335)** to be served as indicated below, on the date and to the addressee(s) shown below:

VIA HAND DELIVERY (CD)

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

Respondent

VIA ELECTRONIC SERVICE

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DATED this 20th day of March, 2015.

By: /s/ PATRICIA FERRUGIA

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09/10/2012	Transcript: Court's Sanction Hearing – Day 1 – Monday, September 10, 2012	V	PA753 – 915
09/11/2012	Transcript: Court's Sanction Hearing – Day 2 – Volume I Tuesday, September 11, 2012	V	PA916 – 87
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02/09/2015	Transcript: Evidentiary Hearing – Motion for Sanctions – Day 1	XX	PA3975 – 4160
02/10/2015	Transcript: Evidentiary Hearing – Motion for Sanctions – Day 2	XXII AND XXIII	PA4406 – 710
03/02/2015	Transcript: Evidentiary Hearing – Motion for Sanctions – Day 5	XXX	PA43202 – 431
03/03/2015	Transcript: Evidentiary Hearing – Motion for Sanctions – Day 6 Closing Arguments	XXXI	PA43432 – 601
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02/12/2015	Transcript: Evidentiary Hearing re Motion for Sanctions – Day 4	XXVII	PA15733 – 875
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Date	Description	Vol. #	Page Nos.
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12/06/2012	Transcript: Hearing on Motion for Protective Order	VIII	PA1569 – 1627
10/09/2014	Transcript: Hearing on Motion for Release of Documents from Advanced Discovery	XIV	PA2689 – 735
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08/14/2014	Transcript: Hearing on Motions	XIV	PA2641 – 86
12/18/2012	Transcript: Hearing on Motions for Protective Order and Sanctions	IX	PA1663 – 1700
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01/06/2015	Transcript: Motions re Vickers Report and Plaintiff's Motion for Setting of Evidentiary Hearing	XV	PA2849 – 948
05/24/2012	Transcript: Status Check	III	PA561 – 82
08/29/2012	Transcript: Telephone Conference	IV	PA700 – 20

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14 *Attorneys for Sands China, Ltd.*

15 **DISTRICT COURT**

16 **CLARK COUNTY, NEVADA**

17 STEVEN C. JACOBS,

18 Plaintiff,

19 v.

20 LAS VEGAS SANDS CORP., a Nevada
corporation; SANDS CHINA LTD., a Cayman
Islands corporation; SHELDON G.
21 ADELSON, in his individual and
representative capacity; DOES I-X; and ROE
22 CORPORATIONS I-X,

23 Defendants.

24
25 AND ALL RELATED MATTERS.
26
27
28

CASE NO.: A627691-B

DEPT NO.: XI

Date: n/a

Time: n/a

**DEFENDANT SANDS CHINA LTD.'S
FIRST SUPPLEMENTAL RESPONSES
TO PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (Nos.
1-24)**

1 TO: STEVEN C. JACOBS, plaintiff

2 TO: JAMES J. PISANELLI, ESQ., TODD L. BICE, ESQ. and DEBRA L. SPINELLI, ESQ.,
3 Counsel for Plaintiff

4 Defendant Sands China Ltd. ("SCL") hereby provides its first supplemental responses and
5 objections to Plaintiff Steven C. Jacobs' ("Plaintiff") First Request For Production Of Documents
6 to Sands China Ltd. ("Requests") as follows:

7 **PRELIMINARY STATEMENT**

8 SCL's responses and objections are made without waiver of the following rights, and are
9 intended to preserve and do preserve the following: (a) the right to raise all questions of
10 competence, authenticity, foundation, relevance, materiality, privilege, and admissibility as
11 evidence for any purpose of the information identified in response to the Requests which may
12 arise in any subsequent proceedings in, or trial of, this or any other action; (b) the right to object
13 on any ground to the use of such information and/or documents identified in response to the
14 Requests which may arise in any subsequent proceeding in, or trial of, this or any other action; (c)
15 the right to object on any ground to the introduction into evidence of such information and/or
16 documents identified in response to the Requests; (d) the right to object on any ground at any
17 time to other discovery involving such information and/or documents; (e) the right to amend or
18 supplement these responses and objections in the event that any information or documents are
19 unintentionally omitted. Inadvertent identification or production of privileged documents or
20 information by SCL is not a waiver of any applicable privilege; and (f) any and all rights to
21 supplement these responses and objections inasmuch as it may ascertain further information from
22 its own discovery.

23 **GENERAL OBJECTIONS**

24 1. SCL objects to the Requests to the extent that they purport to impose obligations
25 upon the party greater than those contemplated in Rule 26(b) of the Nevada Rules of Civil
26 Procedure.

27 Without waiving this General Objection, SCL responds to the Requests as follows:

1 **RESPONSES**

2 **REQUEST FOR PRODUCTION NO. 1:**

3 Please identify and produce all documents that reflect the date, time, and location of each
4 Sands China Board meeting (including the meeting held on April 14, 2010, at 9:00 a.m. Macau
5 Time/April 13, 2010, at 6:00 p.m. Las Vegas time), the location of each Board member who
6 participated in each and every meeting, and the manner/method by which each Board member
7 participated in each and every meeting, during the period of January 1, 2009, to October 20, 2010.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

9 SCL incorporates the Preliminary Statement and the General Objection as though fully set
10 forth herein. SCL objects to this request on the grounds that it is overbroad, vague, ambiguous,
11 and unduly burdensome.

12 SCL also objects to this request to the extent it calls for the disclosure of information
13 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
14 and any other privileges by statute, common law, or otherwise.

15 Subject to and without waiver of the foregoing objections (including the Preliminary
16 Statement and the General Objection), SCL states that it will produce documents that reflect all
17 the information sought by this Request. Please refer to documents bates labeled as
18 SCL00100001, SCL00100030 - SCL00100031, SCL00100032, and produced herewith.

19 **REQUEST FOR PRODUCTION NO. 6:**

20 Please identify and produce all documents and/or communications that reflect and/or are
21 related to Michael A. Leven's service as CEO of Sands China and/or the Executive Director of
22 Sands China Board of Directors, and/or the Special Assistant to the Board during the time period
23 of January 1, 2009 to October 20, 2010.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

25 SCL incorporates the Preliminary Statement and the General Objection as though fully set
26 forth herein. SCL objects to this request on the grounds that it is vastly overbroad and unduly
27 burdensome insofar as it seek "all documents and/or communications that reflect and/or are
28

1 related to" Mr. Leven's service as CEO, Executive Director, or Special Assistant to the Board of
2 SCL, regardless of where those services were performed. There are many documents that fall
3 within the literal scope of this request, most if not all of which are wholly irrelevant to the issue of
4 personal jurisdiction. The burden and expense on SCL of searching for and producing all
5 responsive documents far outweighs the probative value, if any, of those documents.

6 SCL also objects to this request to the extent it calls for the disclosure of information
7 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
8 and any other privileges by statute, common law, or otherwise.

9 Subject to and without waiver of the foregoing objections (including the Preliminary
10 Statement and the General Objection), please refer to documents bates labeled as SCL00100002,
11 SCL00100003 - SCL00100012, SCL00100013, SCL00100014 - SCL00100015, SCL00100016,
12 and produced herewith.

13 **REQUEST FOR PRODUCTION NO. 8:**

14 Please identify and produce all contracts/agreements that Sands China (and/or any
15 individual and/or entity for or on behalf of Sands China) entered into with individuals and/or
16 entities based in or doing business in Nevada, including, but not limited to, any agreements with
17 BASE Entertainment and Bally Technologies, Inc., construction, design, signage, retail mall
18 operations, and/or banking during the time period of January 1, 2009, to October 20, 2010.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

20 SCL incorporates the Preliminary Statement and the General Objection as though fully set
21 forth herein.

22 SCL also objects to this request to the extent it calls for the disclosure of information
23 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
24 and any other privileges by statute, common law, or otherwise.

25 Subject to and without waiver of the foregoing objections (including the Preliminary
26 Statement and the General Objection), please refer to documents bates labeled as SCL00100033 -
27 SCL00100038, SCL00100039 - SCL00100044, SCL00100045 - SCL00100050, SCL00100053 -
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SCL00100055 and produced herewith.

In addition, with respect to the contracts listed in the document bates labeled SCL00100053-SCL00100055, the table below lists the terms of any choice of law, venue, and forum selection clauses. Please note that the contracts with the CIS numbers 5462, 5795, and 6477 are cancelled contracts and therefore were not retained in SCL's system.

Contracting Party or CIS Number	Choice of Law/Governing Law	Venue	Forum Selection
Bally Gaming Inc. d/b/a Bally Technologies Inc. - 4586	Nevada	n/a	n/a
Infinium Software, Inc. - 5119	Nevada	n/a	n/a
JDB Productions - 5454	Macau	Macau	Courts of Macau
5459	Macau	Macau	Courts of Macau
5549 (by incorporation of 5459)	Macau	Macau	Courts of Macau
JDB Productions - 5863	Macau	Macau	Courts of Macau
Casino Data Imaging, Inc. - 6625	Macau	Macau	Courts of Macau
JDB Productions - 6865	Macau	Macau	Courts of Macau

Please also refer to the document previously produced by SCL that is bates labeled SCL000462-SCL000481.

REQUEST FOR PRODUCTION NO. 10:

Please identify and produce all agreements for shared services between and among LVSC and Sands China or any of its subsidiaries, including, but not limited to, (1) procurement services agreements; (2) agreements for the sharing of private jets owned or made available by LVSC; and (3) trademark license agreements, during the time period of January 1, 2009, to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

SCL incorporates the Preliminary Statement and the General Objection as though fully set forth herein.

SCL also objects to this request to the extent it calls for the disclosure of information

1 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
2 and any other privileges by statute, common law, or otherwise.

3 Subject to and without waiver of the foregoing objections (including the Preliminary
4 Statement and the General Objection), please refer to documents bates labeled as SCL00100017 -
5 SCL00100029 and produced herewith. Please also refer to the documents previously produced by
6 SCL000442 to SCL000461. For further information on connected transactions between LVS and
7 SCL, please refer to documents bates labeled as SCL00100051 - SCL00100051, SCL00100052 -
8 SCL00100052 and produced herewith.

9 **REQUEST FOR PRODUCTION NO. 13:**

10 Please identify and produce all documents, memoranda, emails, and/or other
11 correspondence that reflect services performed by LVSC (including LVSC's executives and/or
12 employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or
13 concerning marketing of Sands China properties, including its frequency program, the issuance of
14 "Chairman's Club" cards by Sheldon G. Adelson to Cheung Chi Tai, Jack Lam and others, credit
15 limits, floor layouts, the removal of Cheung Chi Tai, Charles Heung Wah Keung, and others from
16 the Guarantor list of VIP promoters, nightclub operations and approval, including but not limited
17 to Lotus Night Club, and/or the hiring of outside consultants, during the time period of January 1,
18 2009, to October 20, 2010.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

20 SCL incorporates the Preliminary Statement and the General Objection as though fully set
21 forth herein. SCL objects to this request on the grounds that it exceeds the scope of discovery
22 authorized by the Court and appears calculated to obtain merits discovery on the pretense of
23 seeking jurisdictional discovery, contrary to the stay imposed by the Supreme Court. SCL also
24 objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents"
25 responsive to the request, rather than an illustrative subset of documents that are sufficient for
26 Plaintiff to make his arguments on personal jurisdiction.

27 SCL also objects to this request to the extent it calls for the disclosure of information
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1 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
2 and any other privileges by statute, common law, or otherwise.

3 Subject to and without waiver of the foregoing objections (including the Preliminary
4 Statement and the General Objection), please refer to documents bates labeled as SCL00100051 -
5 SCL00100051, SCL00100052 - SCL00100052 and produced herewith.

6 **REQUEST FOR PRODUCTION NO. 22:**

7 To the extent not produced in response to the preceding requests, please identify and
8 produce all documents, memoranda, emails, and/or other correspondence that reflect services
9 performed by LVSC (including LVSC's executives and/or employees and/or consultants and/or
10 agents) for or on behalf of Sands China, during the time period of January 1, 2009, to October 20,
11 2010, including, but not limited to, Yvonne Mao, directions given to Mr. Yueng and/or Eric Chu
12 relating to Hengquin Island, Chu Kong Shipping ("CKS"), the basketball team, the Adelson
13 Center in Beijing, and investigations related to the same; negotiations with Four Seasons,
14 Sheraton and Shangri-La; bonus and remuneration plans; outside counsel's review of Leonel
15 Alves, Foreign Corrupt Practices Act issues and his suitability to serve as counsel for Sands China
16 Limited; International Risk reports on Cheung Chi Tai, Charles Heung, and others commissioned
17 in response to the Reuters' article alleging organized crime; and collection activities relating to
18 patrons and junkets with large outstanding debts due Sands China and/or its subsidiaries.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

20 SCL incorporates the Preliminary Statement and the General Objection as though fully set
21 forth herein. SCL objects to this request on the grounds that it far exceeds the scope of discovery
22 authorized by the Court and instead appears calculated to obtain discovery concerning the merits
23 of this case, rather than personal jurisdiction, contrary to the stay that has been imposed by the
24 Supreme Court. SCL further objects to this request as beyond the scope of discovery authorized
25 by the Court and irrelevant, unduly burdensome, and not reasonable calculated to lead to the
26 discovery of admissible evidence insofar as it is not limited to services that occurred in Nevada.
27 SCL also objects to this request as overbroad and unduly burdensome insofar as it seeks "all
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1 documents" responsive to the request, rather than an illustrative subset of documents that are
2 sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the
3 terms "reflect," "services," and "performed by" because those terms are overbroad, vague, and
4 ambiguous.

5 SCL also objects to this request to the extent it calls for the disclosure of information
6 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
7 and any other privileges by statute, common law, or otherwise.

8 Subject to and without waiver of the foregoing objections (including the Preliminary
9 Statement and the General Objection), please refer to documents bates labeled as SCL00100051 -
10 SCL00100051, SCL00100052 - SCL00100052 and produced herewith.

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12 DATED April 13, 2012

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Brad D. Brian, Esq. (*pro hac admission*)
Henry Weissmann, Esq. (*pro hac admission*)
John B. Owens, Esq. (*pro hac admission*)
Bradley R. Schneider, Esq. (*pro hac admission*)
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and
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9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

Attorneys for Sands China Ltd.

1 CERTIFICATE OF SERVICE

2 Pursuant to Nev. R. Civ. P. 5(b), I certify that on April 13, 2012, I served a true and
3 correct copy of the foregoing **DEFENDANT SANDS CHINA LTD.'S FIRST**
4 **SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR**
5 **PRODUCTION OF DOCUMENTS (Nos. 1-24)** via e-mail and by depositing same in the
6 United States mail, first class postage fully prepaid to the persons and addresses listed below:

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8 Debra L. Spinelli, Esq.
9 Todd L. Bice, Esq.
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13 214-2100
14 214-2101 – fax
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16 dls@pisanellibice.com
17 tlb@pisanellibice.com
18 kap@pisanellibice.com – staff
19 see@pisanellibice.com – staff

20 *Attorney for Plaintiff*

21 
22 An Employee of Mungler, Tolles & Olson LLP

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20 (702) 385-6000
21 (702) 385-6001 – fax
22 m.jones@kempjones.com

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24 Mayer Brown LLP
25 1999 K Street, N.W.
26 Washington, D.C 20006
27 (202) 263-3300
28 mlackey@mayerbrown.com

Attorneys for Sands China, Ltd.

DISTRICT COURT
CLARK COUNTY, NEVADA

20 STEVEN C. JACOBS,

21 Plaintiff,

22 v.

23 LAS VEGAS SANDS CORP., a Nevada
24 corporation; SANDS CHINA LTD., a Cayman
25 Islands corporation; SHELDON G. ADELSON,
26 in his individual and representative capacity;
27 DOES I-X; and ROE CORPORATIONS I-X,

28 Defendants.

27 AND ALL RELATED MATTERS.

CASE NO.: A627691-B
DEPT NO.: XI

Date: n/a
Time: n/a

**SANDS CHINA LTD'S SECOND
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS
(Nos. 1-24)**

1 TO: STEVEN C. JACOBS, plaintiff

2 TO: JAMES J. PISANELLI, ESQ., TODD L. BICE, ESQ. and DEBRA L. SPINELLI, ESQ.
3 Counsel for Plaintiff

4 Defendant Sands China Ltd. ("SCL") hereby responds and objects to Plaintiff Steven C.
5 Jacobs' ("Plaintiff") First Request For Production Of Documents to Sands China Ltd.
6 ("Requests") as follows:

7 **PRELIMINARY STATEMENT**

8 I. SCL's responses and objections are made without waiver of the following rights,
9 and are intended to preserve and do preserve the following:

10 (a) the right to raise all questions of competence, authenticity, foundation,
11 relevance, materiality, privilege, and admissibility as evidence for any purpose of the information
12 identified in response to the Requests which may arise in any subsequent proceedings in, or trial
13 of, this or any other action;

14 (b) the right to object on any ground to the use of such information and/or
15 documents identified in response to the Requests which may arise in any subsequent proceeding
16 in, or trial of, this or any other action;

17 (c) the right to object on any ground to the introduction into evidence of such
18 information and/or documents identified in response to the Requests;

19 (d) the right to object on any ground at any time to other discovery involving
20 such information and/or documents;

21 (e) the right to amend or supplement these responses and objections in the
22 event that any information or documents are unintentionally omitted. Inadvertent identification or
23 production of privileged documents or information by SCL is not a waiver of any applicable
24 privilege; and

25 (f) any and all rights to supplement these responses and objections inasmuch
26 as it may ascertain further information from its own discovery.

GENERAL OBJECTIONS

1
2 1. SCL objects to the Requests to the extent that they purport to impose obligations
3 upon the party greater than those contemplated in Rule 26(b) of the Nevada Rules of Civil
4 Procedure.

5 2. SCL objects to the Requests to the extent that it seeks the identification and/or
6 production of documents not in its possession, custody or control.

7 3. SCL objects to the term "Communication" as defined in the Requests, on the
8 grounds that it is vague, ambiguous, and overbroad, including without limitation, the inclusion of
9 "transmittal of information (in the form of facts, ideas, inquiries or otherwise)" within the
10 definition.

11 4. SCL objects to the terms "concerning," "related to," and "relating to" as defined in
12 the Requests, on the grounds that they are vague, ambiguous, and overbroad as worded.

13 5. SCL objects to the terms "You, Yours, and/or Sands China" as defined for the
14 Requests, on the grounds that they are vague, ambiguous, overbroad, and unintelligible as
15 worded, including without limitation, the inclusion of "any of [SCL's] pre-incorporation, pre-
16 spin-off, pre-IPO entities" and "and/or anyone else acting on its own behalf and/or its direction
17 and instruction" within the definition.

18 6. SCL objects to the terms "Parcels 5 and 6" as defined for the Requests, on the
19 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
20 without limitation, the inclusion of "parcels of property owned by Sands China located on the
21 Cotai Strip" within the definition.

22 7. SCL also objects to the extent that the Requests call for the disclosure of
23 confidential, personal, or proprietary business information, including without limitation, (i)
24 confidential information protected by contractual confidentiality obligations, (ii) confidential
25 information protected by rights of privacy held by SCL and/or other third parties, and (iii)
26 personal information protected from disclosure under Macau law. Such confidential, personal, or
27 proprietary business information will be produced pursuant to a protective order to be entered
28

1 between the parties and/or ordered by the Court.

2 8. SCL further objects to each and every definition and instruction in the Requests to
3 the extent that it attempts or purports to impose obligations exceeding those authorized and
4 imposed by the Nevada Rules of Civil Procedure.

5 Without waiving these General Objections, SCL responds to the Requests as follows:

6 **RESPONSES**

7 **REQUEST FOR PRODUCTION NO. 1:**

8 Please identify and produce all documents that reflect the date, time, and location of each
9 Sands China Board meeting (including the meeting held on April 14, 2010, at 9:00 a.m. Macau
10 Time/April 13, 2010, at 6:00 p.m. Las Vegas time), the location of each Board member who
11 participated in each and every meeting, and the manner/method by which each Board member
12 participated in each and every meeting, during the period of January 1, 2009, to October 20, 2010.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

14 SCL incorporates the Preliminary Statement and each of the General Objections as though
15 fully set forth herein. SCL objects to this request on the grounds that it is overbroad, vague,
16 ambiguous, and unduly burdensome.

17 SCL also objects to this request to the extent it calls for the disclosure of information
18 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
19 and any other privileges by statute, common law, or otherwise.

20 SCL further objects to this request to the extent that it seeks documents and information
21 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
22 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
23 objects to this request because telephonic participation in SCL's Board meetings is insufficient to
24 establish personal jurisdiction over SCL.

25 Subject to and without waiver of the foregoing objections (including the Preliminary
26 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
27 as:

Holland & Hart LLP
 9555 Hillwood Drive, 2nd Floor
 Las Vegas, Nevada 89134

1	Beginning Bates	Ending Bates
2	SCL00100101	SCL00100102
3	SCL00100114	SCL00100114
4	SCL00100116	SCL00100117
5	SCL00100118	SCL00100118
6	SCL00100145	SCL00100150
7	SCL00100191	SCL00100192
8	SCL00100193	SCL00100204
9	SCL00100229	SCL00100230
10	SCL00100231	SCL00100233
11	SCL00100234	SCL00100235
12	SCL00100242	SCL00100242
13	SCL00100252	SCL00100252
14	SCL00100253	SCL00100264
15	SCL00100273	SCL00100274
16	SCL00100275	SCL00100277
17	SCL00100327	SCL00100329
18	SCL00100330	SCL00100331
19	SCL00100332	SCL00100332
20	SCL00100529	SCL00100533
21	SCL00100534	SCL00100534
22	SCL00100535	SCL00100535
23	SCL00100557	SCL00100557
24	SCL00100559	SCL00100560
25	SCL00100561	SCL00100562
26	SCL00100564	SCL00100565
27	SCL00101036	SCL00101036
28	SCL00101037	SCL00101037
	SCL00101038	SCL00101039
	SCL00101040	SCL00101040
	SCL00101041	SCL00101041
	SCL00101042	SCL00101042
	SCL00101043	SCL00101043
	SCL00101044	SCL00101044
	SCL00101045	SCL00101045
	SCL00101046	SCL00101046
	SCL00101047	SCL00101047
	SCL00101048	SCL00101049
	SCL00101050	SCL00101051
	SCL00101052	SCL00101052
	SCL00101053	SCL00101053
	SCL00101054	SCL00101055
	SCL00101065	SCL00101065
	SCL00101067	SCL00101068

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1	SCL00101132	SCL00101134
	SCL00101135	SCL00101136
2	SCL00101137	SCL00101293
3	SCL00101294	SCL00101295
	SCL00101306	SCL00101307
4	SCL00101308	SCL00101308
	SCL00101309	SCL00101310
5	SCL00101311	SCL00101312
6	SCL00101313	SCL00101315
	SCL00101316	SCL00101317
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REQUEST FOR PRODUCTION NO. 5:

To the extent not produced in response to the preceding requests, please identify and produce all documents that reflect the travels to and from Macau/China/Hong Kong by any LVSC executive and/or employee for work performed on behalf of or directly for Sands China (including, but not limited to, flight logs, travel itineraries) during the time period of January 1, 2009, to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to the phrase "on behalf of or directly for Sands China" on the grounds that it is vague, ambiguous, and calls for a legal conclusion. To the extent that it produces documents in response to this request, SCL is not making any admission as to the legal significance of those documents and specifically denies that LVSC acted as the agent for SCL. SCL further objects to this request as overbroad and unduly burdensome insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction. SCL also objects to the terms "executive," and "employee" because those terms are overbroad, vague, and ambiguous.

SCL also objects to this request to the extent it calls for the disclosure of information

1 protected from disclosure under the attorney-client privilege, the attorney work-product privilege
2 and any other privileges by statute, common law, or otherwise.

3 SCL further objects to this request to the extent that it seeks documents and information
4 that are not relevant to the determination of personal jurisdiction over SCL in Nevada's district
5 courts and not calculated to lead to the discovery of admissible evidence. In this regard, SCL
6 objects to this Request because the travel by any LVSC representative outside of Nevada is
7 irrelevant to whether SCL has sufficient contacts with Nevada such that a Nevada court may
8 assert personal jurisdiction over SCL.

9 Subject to and without waiver of the foregoing objections (including the Preliminary
10 Statement and General Objections), SCL states that it will produce non-privileged documents
11 sufficient to show travel by officers of LVSC to Macau, China and Hong Kong in connection with
12 work for SCL during the time period of January 1, 2009 to October 20, 2010, to the extent such
13 documents can be located through reasonable diligence.

14 Subject to and without waiver of the foregoing objections (including the Preliminary
15 Statement and General Objections), please refer to the documents produced by SCL Bates labeled
16 as:

Beginning Bates	Ending Bates
SCL00100221	SCL00100223
SCL00100226	SCL00100228
SCL00100236	SCL00100236
SCL00100243	SCL00100243
SCL00100244	SCL00100244
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SCL00101587	SCL00101592
SCL00101764	SCL00101764
SCL00102044	SCL00102044
SCL00102046	SCL00102049
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REQUEST FOR PRODUCTION NO. 6:

Please identify and produce all documents and/or communications that reflect and/or are related to Michael A. Leven's service as CEO of Sands China and/or the Executive Director of Sands China Board of Directors, and/or the Special Assistant to the Board during the time period of January 1, 2009 to October 20, 2010.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

SCL incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein. SCL objects to this request on the grounds that it is vastly overbroad and unduly burdensome insofar as it seek "all documents and/or communications that reflect and/or are related to" Mr. Leven's service as CEO, Executive Director, or Special Assistant to the Board of SCL, regardless of where those services were performed. There are many documents that fall within the literal scope of this request, most if not all of which are wholly irrelevant to the issue of personal jurisdiction. The burden and expense on SCL of searching for and producing all