

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: 2015-08:29 a.m.
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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 XVIII of XXXIII
(PA3577 – 3784)**

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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 XVIII of XXXIII (PA3577 – 3784)** 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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9
10 **DISTRICT COURT**
CLARK COUNTY, NEVADA

11 STEVEN C. JACOBS,

12 Plaintiff,

13 v.

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

16 Defendants.

17
18 AND ALL RELATED MATTERS.
19
20

CASE NO.: A627691-B

DEPT NO.: XI

Date: n/a

Time: n/a

**LAS VEGAS SANDS CORP.'S FIFTH
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (Nos.
1-24)**

21 TO: STEVEN C. JACOBS, plaintiff

22 TO: JAMES J. PISANELLI, ESQ., TODD L. BICE, ESQ. and DEBRA L. SPINELLI, ESQ.

23 Counsel for Plaintiff

24 Defendant Las Vegas Sands Corp. ("LVSC") hereby responds and objects to Plaintiff
25 Steven C. Jacobs' ("Plaintiff") First Request For Production Of Documents to Las Vegas Sands
26 Corp. ("Requests") as follows:

27 **PRELIMINARY STATEMENT**

28 1. LVSC's responses and objections are made without waiver of the following rights,

1 and are intended to preserve and do preserve the following:

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

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

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

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

13 (e) the right to amend or supplement these responses and objections in the
14 event that any information or documents are unintentionally omitted. Inadvertent identification or
15 production of privileged documents or information by LVSC is not a waiver of any applicable
16 privilege; and

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

19 **GENERAL OBJECTIONS**

20 1. LVSC objects to the Requests to the extent that they purport to impose obligations
21 upon LVSC greater than those contemplated in Rule 26(b) of the Nevada Rules of Civil
22 Procedure.

23 2. LVSC objects to the Requests to the extent that they seek the identification and/or
24 production of documents not in its possession, custody or control.

25 3. LVSC objects to the term "Communication" as defined in the Requests, on the
26 grounds that it is vague, ambiguous, and overbroad, including without limitation, the inclusion of
27 "transmittal of information (in the form of facts, ideas, inquiries or otherwise)" within the
28 definition.

1 4. LVSC objects to the terms “concerning,” “related to,” and “relating to” as defined
2 in the Requests, on the grounds that they are vague, ambiguous, and overbroad as worded.

3 5. LVSC objects to the terms “You and/or Yours” as defined in the Requests, on the
4 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
5 without limitation, the inclusion of “any other affiliated entities, as well as owners, shareholders,
6 officers, employees, attorneys, accountants, agents, investigators, and/or anyone else acting on its
7 behalf and/or its direction and instruction.”

8 6. LVSC objects to the term “Sands China” as defined in the Requests, on the
9 grounds that it is vague, ambiguous, overbroad, and unintelligible as worded, including without
10 limitation, the inclusion of “any of [SCL’s] pre-incorporation, pre-spin-off, pre-IPO entities” and
11 “and/or anyone else acting on its own behalf and/or its direction and instruction” within the
12 definition. LVSC will construe the term “Sands China” or “SCL” to mean LVSC’s subsidiary,
13 Sands China Limited.

14 7. LVSC objects to the terms “Parcels 5 and 6” as defined for the Requests, on the
15 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
16 without limitation, the inclusion of “parcels of property owned by Sands China located on the
17 Cotai Strip” within the definition.

18 8. LVSC objects to all the Requests to the extent that they assume a disputed legal
19 conclusion, namely, that LVSC and/or its employees acted as agents for SCL in conducting
20 business activities in Nevada. LVSC disputes that it or its employees acted as SCL’s agent in
21 Nevada. To the extent that it produces documents in response to these Requests, LVSC does not
22 thereby admit that any agency relationship exists between LVSC and SCL.

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

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

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

5 11. By responding to these Requests, LVSC does not in any way waive any rights or
6 objections, including but not limited to LVSC's objections to participation in this jurisdictional
7 discovery notwithstanding the Nevada Supreme Court's August 26, 2011 Writ of Mandamus and
8 stay of this litigation until the adjudication of the issue of whether the District Court holds
9 personal jurisdiction as to SCL.

10 Without waiving these General Objections, LVSC responds to the Requests as follows:

11 **RESPONSES**

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

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

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

19 LVSC incorporates the Preliminary Statement and each of the General Objections as
20 though fully set forth herein.

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

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

27 LVS00120874 - LVS00120876; LVS00121069 - LVS00121071; LVS00121227 - LVS00121235;
28 LVS00121236 - LVS00121240; LVS00121241 - LVS00121244; LVS00121245 - LVS00121247;

1 LVS00121259 - LVS00121260; LVS00121380 - LVS00121382; LVS00121383 - LVS00121441;
2 LVS00121703 - LVS00121703; LVS00121849 - LVS00121850; LVS00121990 - LVS00121995;
3 LVS00121996 - LVS00122000; LVS00122001 - LVS00122005; LVS00122006 - LVS00122007;
4 LVS00122008 - LVS00122009; LVS00122131 - LVS00122132; LVS00122133 - LVS00122191;
5 LVS00122567 - LVS00122567; LVS00122595 - LVS00122597; LVS00123022 - LVS00123023;
6 LVS00123024 - LVS00123024; LVS00123453 - LVS00123453; LVS00123486 - LVS00123487;
7 LVS00123546 - LVS00123547; LVS00123556 - LVS00123557; LVS00123593 - LVS00123594;
8 LVS00123605 - LVS00123607; LVS00123728 - LVS00123729; LVS00123836 - LVS00123837;
9 LVS00123838 - LVS00123994; LVS00124011 - LVS00124012; LVS00124058 - LVS00124060;
10 LVS00124062 - LVS00124066; LVS00124081 - LVS00124082; LVS00124128 - LVS00124129;
11 LVS00124134 - LVS00124135; LVS00124136 - LVS00124137; LVS00124138 - LVS00124139;
12 LVS00124220 - LVS00124220; LVS00124226 - LVS00124226; LVS00124270 - LVS00124274;
13 LVS00124275 - LVS00124279; LVS00124293 - LVS00124293; LVS00124295 - LVS00124295;
14 LVS00124301 - LVS00124302; LVS00124323 - LVS00124323; LVS00124350 - LVS00124350;
15 LVS00124536 - LVS00124538; LVS00124539 - LVS00124541; LVS00124542 - LVS00124544;
16 LVS00124612 - LVS00124613; LVS00124621 - LVS00124622; LVS00124825 - LVS00124826;
17 LVS00124859 - LVS00124862; LVS00124866 - LVS00124866; LVS00124925 - LVS00124926;
18 LVS00124973 - LVS00124973; LVS00125035 - LVS00125037; LVS00125038 - LVS00125096;
19 LVS00125186 - LVS00125187; LVS00125188 - LVS00125246; LVS00125336 - LVS00125336;
20 LVS00125337 - LVS00125348; LVS00125349 - LVS00125351; LVS00125352 - LVS00125353;
21 LVS00125354 - LVS00125365; LVS00125366 - LVS00125368; LVS00125369 - LVS00125371;
22 LVS00125372 - LVS00125528; LVS00125536 - LVS00125538; LVS00125541 - LVS00125548;
23 LVS00125549 - LVS00125551; LVS00125552 - LVS00125556; LVS00125557 - LVS00125561;
24 LVS00125562 - LVS00125564; LVS00125566 - LVS00125567; LVS00125568 - LVS00125569;
25 LVS00125570 - LVS00125572; LVS00125573 - LVS00125575; LVS00125587 - LVS00125590;
26 LVS00125591 - LVS00125592; LVS00125595 - LVS00125597; LVS00125599 - LVS00125600;
27 LVS00125601 - LVS00125601; LVS00125603 - LVS00125603; LVS00125605 - LVS00125606;
28 LVS00125820 - LVS00125824; LVS00125825 - LVS00125827; LVS00125828 - LVS00125831;

1 LVS00125832 - LVS00125832; LVS00125849 - LVS00125851; LVS00125854 - LVS00125857;
2 LVS00125859 - LVS00125861; LVS00125867 - LVS00125872; LVS00125889 - LVS00125892;
3 LVS00125894 - LVS00125896; LVS00125924 - LVS00125924; LVS00125926 - LVS00125926;
4 LVS00125929 - LVS00125930; LVS00125932 - LVS00125933; LVS00125936 - LVS00125939;
5 LVS00126058 - LVS00126060; LVS00126061 - LVS00126062; LVS00126152 - LVS00126152;
6 LVS00126155 - LVS00126156; LVS00126158 - LVS00126159; LVS00126160 - LVS00126162;
7 LVS00126163 - LVS00126165; LVS00126166 - LVS00126167; LVS00126168 - LVS00126169;
8 LVS00126170 - LVS00126170; LVS00126192 - LVS00126194; LVS00126195 - LVS00126198;
9 LVS00126199 - LVS00126201; LVS00126207 - LVS00126207; LVS00126348 - LVS00126348;
10 LVS00126440 - LVS00126442; LVS00126489 - LVS00126490; LVS00126491 - LVS00126491;
11 LVS00126516 - LVS00126517; LVS00126518 - LVS00126519; LVS00126521 - LVS00126521;
12 LVS00126522 - LVS00126533; LVS00126534 - LVS00126536; LVS00126537 - LVS00126539;
13 LVS00126542 - LVS00126546; LVS00126547 - LVS00126547; LVS00126548 - LVS00126559;
14 LVS00126560 - LVS00126562; LVS00126563 - LVS00126564; LVS00126565 - LVS00126565;
15 LVS00126566 - LVS00126570; LVS00126571 - LVS00126572; LVS00126574 - LVS00126575;
16 LVS00126576 - LVS00126577; LVS00126578 - LVS00126579; LVS00126581 - LVS00126585;
17 LVS00126586 - LVS00126590; LVS00126591 - LVS00126591; LVS00126593 - LVS00126593;
18 LVS00126596 - LVS00126596; LVS00126599 - LVS00126599; LVS00126601 - LVS00126603;
19 LVS00126604 - LVS00126606; LVS00126607 - LVS00126608; LVS00126610 - LVS00126611;
20 LVS00126632 - LVS00126634; LVS00126635 - LVS00126635; LVS00126642 - LVS00126643;
21 LVS00126644 - LVS00126646; LVS00126647 - LVS00126648; LVS00126659 - LVS00126660;
22 LVS00126666 - LVS00126667; LVS00126676 - LVS00126676; LVS00126678 - LVS00126678;
23 LVS00126681 - LVS00126681; LVS00126689 - LVS00126690; LVS00126695 - LVS00126696;
24 LVS00126700 - LVS00126701; LVS00126702 - LVS00126703; LVS00126789 - LVS00126790;
25 LVS00126791 - LVS00126792; LVS00126797 - LVS00126798; LVS00126800 - LVS00126801;
26 LVS00126802 - LVS00126803; LVS00126804 - LVS00126805; LVS00126806 - LVS00126809;
27 LVS00126810 - LVS00126812; LVS00126813 - LVS00126817; LVS00126818 - LVS00126822;
28 LVS00126823 - LVS00126827; LVS00126828 - LVS00126832; LVS00127411 - LVS00127412;

1 LVS00127434 - LVS00127434; LVS00127437 - LVS00127437; LVS00127530 - LVS00127531;
2 LVS00127634 - LVS00127635; LVS00127639 - LVS00127640; LVS00127661 - LVS00127662;
3 LVS00127664 - LVS00127664; LVS00127876 - LVS00127876; LVS00127877 - LVS00127964;
4 LVS00128046 - LVS00128047; LVS00128060 - LVS00128062; LVS00128063 - LVS00128067;
5 LVS00128068 - LVS00128068; LVS00128137 - LVS00128138; LVS00128139 - LVS00128140;
6 LVS00128142 - LVS00128143; LVS00128145 - LVS00128146; LVS00128164 - LVS00128164;
7 LVS00128181 - LVS00128268

8 **REQUEST FOR PRODUCTION NO. 5:**

9 To the extent not produced in response to the preceding requests, please identify and
10 produce all documents that reflect the travels to and from Macau/China/Hong Kong by any LVSC
11 executive and/or employee for work performed on behalf of or directly for Sands China
12 (including, but not limited to, flight logs, travel itineraries) during the time period of January 1,
13 2009, to October 20, 2010.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

15 LVSC incorporates the Preliminary Statement and each of the General Objections as
16 though fully set forth herein.

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

23 LVS00120711 - LVS00120712; LVS00121069 - LVS00121071; LVS00121090 - LVS00121091;
24 LVS00121092 - LVS00121094; LVS00121116 - LVS00121117; LVS00121118 - LVS00121119;
25 LVS00121120 - LVS00121120; LVS00121126 - LVS00121127; LVS00121130 - LVS00121131;
26 LVS00121138 - LVS00121139; LVS00121187 - LVS00121187; LVS00121261 - LVS00121263;
27 LVS00121866 - LVS00121867; LVS00121868 - LVS00121868; LVS00121893 - LVS00121894;
28 LVS00121895 - LVS00121896; LVS00121897 - LVS00121898; LVS00121899 - LVS00121899;

1 LVS00121900 - LVS00121901; LVS00122448 - LVS00122452; LVS00122453 - LVS00122457;
2 LVS00122459 - LVS00122463; LVS00122464 - LVS00122467; LVS00122469 - LVS00122471;
3 LVS00122568 - LVS00122572; LVS00122573 - LVS00122576; LVS00122577 - LVS00122579;
4 LVS00122580 - LVS00122582; LVS00122583 - LVS00122586; LVS00122587 - LVS00122588;
5 LVS00122589 - LVS00122590; LVS00122591 - LVS00122594; LVS00122614 - LVS00122618;
6 LVS00122619 - LVS00122622; LVS00122623 - LVS00122627; LVS00122644 - LVS00122644;
7 LVS00122645 - LVS00122648; LVS00122665 - LVS00122666; LVS00122671 - LVS00122675;
8 LVS00122676 - LVS00122681; LVS00122708 - LVS00122708; LVS00122723 - LVS00122724;
9 LVS00122729 - LVS00122729; LVS00122746 - LVS00122746; LVS00122788 - LVS00122788;
10 LVS00122837 - LVS00122840; LVS00122857 - LVS00122858; LVS00122878 - LVS00122881;
11 LVS00122928 - LVS00122928; LVS00122987 - LVS00122987; LVS00122996 - LVS00122997;
12 LVS00122998 - LVS00122998; LVS00123465 - LVS00123465; LVS00123583 - LVS00123583;
13 LVS00123668 - LVS00123668; LVS00123676 - LVS00123677; LVS00123747 - LVS00123750;
14 LVS00123751 - LVS00123752; LVS00123806 - LVS00123806; LVS00123815 - LVS00123816;
15 LVS00124091 - LVS00124093; LVS00124094 - LVS00124095; LVS00124099 - LVS00124100;
16 LVS00124256 - LVS00124257; LVS00124258 - LVS00124258; LVS00124305 - LVS00124305;
17 LVS00124310 - LVS00124311; LVS00124315 - LVS00124316; LVS00124321 - LVS00124321;
18 LVS00124357 - LVS00124357; LVS00124358 - LVS00124358; LVS00124528 - LVS00124531;
19 LVS00124532 - LVS00124535; LVS00124576 - LVS00124576; LVS00124844 - LVS00124844;
20 LVS00124851 - LVS00124852; LVS00124881 - LVS00124881; LVS00124974 - LVS00124977;
21 LVS00124979 - LVS00124980; LVS00124985 - LVS00124985; LVS00125001 - LVS00125001;
22 LVS00125529 - LVS00125532; LVS00125533 - LVS00125535; LVS00125585 - LVS00125586;
23 LVS00125593 - LVS00125593; LVS00126126 - LVS00126128; LVS00126133 - LVS00126134;
24 LVS00126135 - LVS00126138; LVS00126139 - LVS00126141; LVS00126142 - LVS00126143;
25 LVS00126144 - LVS00126145; LVS00126148 - LVS00126149; LVS00126173 - LVS00126173;
26 LVS00126174 - LVS00126177; LVS00126206 - LVS00126206; LVS00126360 - LVS00126361;
27 LVS00126376 - LVS00126377; LVS00126487 - LVS00126488; LVS00126540 - LVS00126541;
28 LVS00126653 - LVS00126654; LVS00126655 - LVS00126658; LVS00126757 - LVS00126757;

1 LVS00126758 - LVS00126758; LVS00126759 - LVS00126760; LVS00126788 - LVS00126788;
2 LVS00127101 - LVS00127101; LVS00127107 - LVS00127107; LVS00127115 - LVS00127116;
3 LVS00127123 - LVS00127124; LVS00127125 - LVS00127126; LVS00127237 - LVS00127237;
4 LVS00127238 - LVS00127238; LVS00127239 - LVS00127240; LVS00127242 - LVS00127242;
5 LVS00127244 - LVS00127245; LVS00127271 - LVS00127272; LVS00127283 - LVS00127284;
6 LVS00127286 - LVS00127286; LVS00127288 - LVS00127289; LVS00127315 - LVS00127316;
7 LVS00127317 - LVS00127318; LVS00127319 - LVS00127320; LVS00127324 - LVS00127326;
8 LVS00127327 - LVS00127329; LVS00127330 - LVS00127332; LVS00127333 - LVS00127335;
9 LVS00127337 - LVS00127340; LVS00127346 - LVS00127346; LVS00127347 - LVS00127347;
10 LVS00127478 - LVS00127478; LVS00127487 - LVS00127487; LVS00127509 - LVS00127509;
11 LVS00127510 - LVS00127511; LVS00127512 - LVS00127513; LVS00127514 - LVS00127516;
12 LVS00127517 - LVS00127519; LVS00127520 - LVS00127522; LVS00127523 - LVS00127525;
13 LVS00127526 - LVS00127529; LVS00127533 - LVS00127536; LVS00127677 - LVS00127678;
14 LVS00127679 - LVS00127680; LVS00127720 - LVS00127724; LVS00127752 - LVS00127756;
15 LVS00127757 - LVS00127761; LVS00127866 - LVS00127870; LVS00127871 - LVS00127875;
16 LVS00128048 - LVS00128048; LVS00128049 - LVS00128049; LVS00128050 - LVS00128051;
17 LVS00128052 - LVS00128054; LVS00128055 - LVS00128056; LVS00128057 - LVS00128058;
18 LVS00128136 - LVS00128136; LVS00128141 - LVS00128141; LVS00128150 - LVS00128150;
19 LVS00128155 - LVS00128156; LVS00128162 - LVS00128163

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

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

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

26 LVSC incorporates the Preliminary Statement and each of the General Objections as
27 though fully set forth herein.

28 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
5 labeled as:

6 LVS00119564 - LVS00119564; LVS00120136 - LVS00120137; LVS00120295 - LVS00120295;
7 LVS00120310 - LVS00120310; LVS00120311 - LVS00120374; LVS00120409 - LVS00120409;
8 LVS00120410 - LVS00120428; LVS00120450 - LVS00120450; LVS00120465 - LVS00120466;
9 LVS00120467 - LVS00120467; LVS00120674 - LVS00120674; LVS00120681 - LVS00120686;
10 LVS00120687 - LVS00120691; LVS00120692 - LVS00120696; LVS00120697 - LVS00120701;
11 LVS00120702 - LVS00120702; LVS00120714 - LVS00120716; LVS00120727 - LVS00120729;
12 LVS00120730 - LVS00120732; LVS00120733 - LVS00120737; LVS00120738 - LVS00120741;
13 LVS00120742 - LVS00120745; LVS00120746 - LVS00120750; LVS00120751 - LVS00120751;
14 LVS00120752 - LVS00120758; LVS00120759 - LVS00120759; LVS00120765 - LVS00120772;
15 LVS00120786 - LVS00120786; LVS00120787 - LVS00120789; LVS00120790 - LVS00120792;
16 LVS00120793 - LVS00120795; LVS00120796 - LVS00120797; LVS00120801 - LVS00120801;
17 LVS00120802 - LVS00120810; LVS00120822 - LVS00120824; LVS00120825 - LVS00120826;
18 LVS00120827 - LVS00120828; LVS00120829 - LVS00120830; LVS00120831 - LVS00120831;
19 LVS00120832 - LVS00120837; LVS00120838 - LVS00120840; LVS00120841 - LVS00120842;
20 LVS00120843 - LVS00120843; LVS00120844 - LVS00120844; LVS00120845 - LVS00120845;
21 LVS00120846 - LVS00120853; LVS00120854 - LVS00120860; LVS00120861 - LVS00120861;
22 LVS00120862 - LVS00120864; LVS00120865 - LVS00120865; LVS00120866 - LVS00120869;
23 LVS00120870 - LVS00120873; LVS00120874 - LVS00120876; LVS00120877 - LVS00120878;
24 LVS00120879 - LVS00120880; LVS00120881 - LVS00120881; LVS00120883 - LVS00120883;
25 LVS00120996 - LVS00120997; LVS00120998 - LVS00121000; LVS00121001 - LVS00121002;
26 LVS00121003 - LVS00121003; LVS00121004 - LVS00121004; LVS00121005 - LVS00121062;
27 LVS00121066 - LVS00121066; LVS00121067 - LVS00121067; LVS00121068 - LVS00121068;
28 LVS00121069 - LVS00121071; LVS00121072 - LVS00121072; LVS00121073 - LVS00121073;

1 LVS00121074 - LVS00121074; LVS00121075 - LVS00121075; LVS00121076 - LVS00121077;
2 LVS00121078 - LVS00121079; LVS00121080 - LVS00121082; LVS00121083 - LVS00121086;
3 LVS00121087 - LVS00121089; LVS00121095 - LVS00121097; LVS00121098 - LVS00121098;
4 LVS00121099 - LVS00121101; LVS00121102 - LVS00121102; LVS00121103 - LVS00121104;
5 LVS00121105 - LVS00121106; LVS00121107 - LVS00121109; LVS00121110 - LVS00121112;
6 LVS00121113 - LVS00121114; LVS00121115 - LVS00121115; LVS00121121 - LVS00121123;
7 LVS00121124 - LVS00121125; LVS00121132 - LVS00121132; LVS00121156 - LVS00121156;
8 LVS00121169 - LVS00121170; LVS00121172 - LVS00121173; LVS00121176 - LVS00121176;
9 LVS00121177 - LVS00121178; LVS00121183 - LVS00121183; LVS00121184 - LVS00121185;
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11 LVS00126612 - LVS00126612; LVS00126632 - LVS00126634; LVS00126635 - LVS00126635;
12 LVS00126637 - LVS00126638; LVS00126642 - LVS00126643; LVS00126644 - LVS00126646;
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16 LVS00126678 - LVS00126678; LVS00126681 - LVS00126681; LVS00126682 - LVS00126685;
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18 LVS00127302 - LVS00127304; LVS00127305 - LVS00127307; LVS00127308 - LVS00127310;
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1 LVS00127551 - LVS00127551; LVS00127552 - LVS00127552; LVS00127553 - LVS00127553;
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13 LVS00127727 - LVS00127729; LVS00127762 - LVS00127762; LVS00127764 - LVS00127765;
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22 LVS00128181 - LVS00128268; LVS00128269 - LVS00128269; LVS00128321 - LVS00128321;
23 LVS00128344 - LVS00128344

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

25 Please identify and produce all documents that reflect the location of the negotiation and
26 execution of agreements related to the funding of Sands China, during the time period of January
27 1, 2009, to October 20, 2010, including, but not limited to, the raising of pre-IPO funds, the IPO,
28 underwriting for Sites 5 & 6, loan refinancing and/or covenant relief/term modifications pre-IPO,

1 the services of Bank of China to bring high net worth investors/gamblers to buy the Four Seasons
2 Serviced Apartments, and the written proposal of Leonel Alves to obtain strata-title for the Four
3 Seasons Apartments involving Beijing government officials.

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

5 LVSC incorporates the Preliminary Statement and each of the General Objections as
6 though fully set forth herein.

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

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 LVSC Bates
12 labeled as:

13 LVS00119727 - LVS00119727; LVS00119730 - LVS00119733; LVS00119751 - LVS00119754;
14 LVS00119774 - LVS00119778; LVS00119779 - LVS00119783; LVS00119785 - LVS00119792;
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17 LVS00119968 - LVS00119972; LVS00119973 - LVS00119977; LVS00120085 - LVS00120088;
18 LVS00120089 - LVS00120092; LVS00120124 - LVS00120124; LVS00120126 - LVS00120130;
19 LVS00120131 - LVS00120135; LVS00120213 - LVS00120217; LVS00120218 - LVS00120222;
20 LVS00120223 - LVS00120226; LVS00120227 - LVS00120230; LVS00120263 - LVS00120268;
21 LVS00120269 - LVS00120273; LVS00120388 - LVS00120393; LVS00120436 - LVS00120439;
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23 LVS00120578 - LVS00120582; LVS00120595 - LVS00120595; LVS00120596 - LVS00120599;
24 LVS00120627 - LVS00120631; LVS00120667 - LVS00120670; LVS00120713 - LVS00120713;
25 LVS00120717 - LVS00120721; LVS00120722 - LVS00120726; LVS00121140 - LVS00121142;
26 LVS00121146 - LVS00121147; LVS00121148 - LVS00121151; LVS00121152 - LVS00121155;
27 LVS00121171 - LVS00121171; LVS00121666 - LVS00121670; LVS00121671 - LVS00121680;
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1 LVS00121834 - LVS00121834; LVS00121843 - LVS00121843; LVS00121907 - LVS00121907;
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3 LVS00121915 - LVS00121918; LVS00121919 - LVS00121919; LVS00121935 - LVS00121935;
4 LVS00122814 - LVS00122815; LVS00122816 - LVS00122817; LVS00122819 - LVS00122819;
5 LVS00122820 - LVS00122820; LVS00122821 - LVS00122821; LVS00122833 - LVS00122833;
6 LVS00122836 - LVS00122836; LVS00122877 - LVS00122877; LVS00122900 - LVS00122903;
7 LVS00122920 - LVS00122921; LVS00122934 - LVS00122934; LVS00122952 - LVS00122952;
8 LVS00122968 - LVS00122968; LVS00122988 - LVS00122988; LVS00123025 - LVS00123449;
9 LVS00123512 - LVS00123512; LVS00123549 - LVS00123549; LVS00123570 - LVS00123571;
10 LVS00123666 - LVS00123667; LVS00123687 - LVS00123688; LVS00123716 - LVS00123716;
11 LVS00123746 - LVS00123746; LVS00123759 - LVS00123759; LVS00123790 - LVS00123790;
12 LVS00124043 - LVS00124043; LVS00124072 - LVS00124073; LVS00124078 - LVS00124080;
13 LVS00124087 - LVS00124088; LVS00124089 - LVS00124090; LVS00124101 - LVS00124102;
14 LVS00124106 - LVS00124106; LVS00124254 - LVS00124254; LVS00124261 - LVS00124261;
15 LVS00124281 - LVS00124281; LVS00124306 - LVS00124306; LVS00124322 - LVS00124322;
16 LVS00124398 - LVS00124399; LVS00124402 - LVS00124402; LVS00124545 - LVS00124554;
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28 LVS00127094 - LVS00127094; LVS00127095 - LVS00127096; LVS00127097 - LVS00127098;

1 LVS00127148 - LVS00127149; LVS00127160 - LVS00127160; LVS00127195 - LVS00127195;
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3 LVS00127341 - LVS00127341; LVS00127342 - LVS00127343; LVS00127344 - LVS00127345;
4 LVS00127395 - LVS00127397; LVS00127407 - LVS00127407; LVS00127408 - LVS00127408;
5 LVS00127409 - LVS00127409; LVS00127416 - LVS00127416; LVS00127417 - LVS00127418;
6 LVS00127419 - LVS00127420; LVS00127421 - LVS00127423; LVS00127424 - LVS00127425;
7 LVS00127488 - LVS00127489; LVS00127490 - LVS00127491; LVS00127676 - LVS00127676;
8 LVS00128070 - LVS00128070

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

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

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

16 LVSC incorporates the Preliminary Statement and each of the General Objections as
17 though fully set forth herein.

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

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

24 LVS00126725 - LVS00126727; LVS00126728 - LVS00126730; LVS00126731 - LVS00126734;
25 LVS00126735 - LVS00126736; LVS00126737 - LVS00126739; LVS00126740 - LVS00126742;
26 LVS00126748 - LVS00126749; LVS00126750 - LVS00126755

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

28

1 Please identify and produce all documents that reflect work Robert G. Goldstein
2 performed for or on behalf of Sands China, during the time period of January 1, 2009, to October
3 20, 2010, including global gaming and/or international player development efforts, such as active
4 recruitment of VIP players to share between and among LVSC and Sands China properties,
5 details concerning trips with Larry Chu into China to recruit new VIP players, dinners and/or
6 meetings with Cheung Chi Tai, Charles Heung Wah Keung, and/or other VIP promoters, players
7 funding, the transfer of players funds, and the use of Venetian Marketing Services Limited
8 ("VMSL") and/or other entities to secure players and facilitate money transfers.

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

10 LVSC incorporates the Preliminary Statement and each of the General Objections as
11 though fully set forth herein.

12 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
17 labeled as:
18 LVS00119459 - LVS00119461; LVS00119462 - LVS00119462; LVS00119463 - LVS00119464;
19 LVS00119465 - LVS00119466; LVS00119467 - LVS00119468; LVS00119474 - LVS00119476;
20 LVS00119477 - LVS00119478; LVS00119479 - LVS00119480; LVS00119513 - LVS00119514;
21 LVS00119515 - LVS00119516; LVS00119517 - LVS00119518; LVS00119519 - LVS00119521;
22 LVS00119522 - LVS00119523; LVS00119524 - LVS00119525; LVS00119526 - LVS00119527;
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28 LVS00119630 - LVS00119631; LVS00119632 - LVS00119632; LVS00119649 - LVS00119649;

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8 LVS00119706 - LVS00119706; LVS00119711 - LVS00119712; LVS00119713 - LVS00119714;
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26 LVS00119998 - LVS00119999; LVS00120001 - LVS00120009; LVS00120010 - LVS00120010;
27 LVS00120011 - LVS00120013; LVS00120018 - LVS00120019; LVS00120020 - LVS00120020;
28 LVS00120021 - LVS00120021; LVS00120025 - LVS00120026; LVS00120030 - LVS00120031;

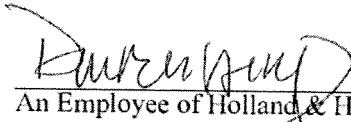
Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

CERTIFICATE OF SERVICE

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

James J. Pisanelli, Esq.
Debra L. Spinelli, Esq.
Todd L. Bice, Esq.
PISANELLI & BICE
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kap@pisanellibice.com – staff
see@pisanellibice.com – staff

Attorney for Plaintiff


An Employee of Holland & Hart, LLP

Dineen Bergsing

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Subject: LV Sands/Jacobs - LV Sands' Eighth Supplemental Responses to Plaintiff's First Request for Production of Documents Nos. 1-24
Attachments: 4679_001

Please see attached LV Sands' Eighth Supplemental Responses to Plaintiff's First Request for Production of Documents Nos. 1-24. A copy to follow by mail.

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15 LVS00230955; LVS00231019 - LVS00231021; LVS00231024 - LVS00231030.

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

17 Please identify and produce all documents that reflect the location of the negotiation and
18 execution of agreements related to the funding of Sands China, during the time period of January
19 1, 2009, to October 20, 2010, including, but not limited to, the raising of pre-IPO funds, the IPO,
20 underwriting for Sites 5 & 6, loan refinancing and/or covenant relief/term modifications pre-IPO,
21 the services of Bank of China to bring high net worth investors/gamblers to buy the Four Seasons
22 Serviced Apartments, and the written proposal of Leonel Alves to obtain strata-title for the Four
23 Seasons Apartments involving Beijing government officials.

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

25 LVSC incorporates the Preliminary Statement and each of the General Objections as
26 though fully set forth herein.

27 LVSC also objects to this request to the extent it calls for the disclosure of information
28 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 Subject to and without waiver of the foregoing objections (including the Preliminary
3 Statement and General Objections), please refer to the documents produced by LVSC Bates
4 labeled as: LVS00206574 - LVS00206578; LVS00206579 - LVS00206580; LVS00206581 -
5 LVS00206626; LVS00206627 - LVS00206660; LVS00206661 - LVS00206693; LVS00206694 -
6 LVS00206726; LVS00206727 - LVS00206735; LVS00206736; LVS00206737; LVS00206747 -
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4 LVS00230881; LVS00230882 - LVS00230884; LVS00231001.

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

6 Please identify and produce all documents that reflect work Robert G. Goldstein
7 performed for or on behalf of Sands China, during the time period of January 1, 2009, to October
8 20, 2010, including global gaming and/or international player development efforts, such as active
9 recruitment of VIP players to share between and among LVSC and Sands China properties,
10 details concerning trips with Larry Chu into China to recruit new VIP players, dinners and/or
11 meetings with Cheung Chi Tai, Charles Heung Wah Keung, and/or other VIP promoters, players
12 funding, the transfer of players funds, and the use of Venetian Marketing Services Limited
13 ("VMSL") and/or other entities to secure players and facilitate money transfers.

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

15 LVSC incorporates the Preliminary Statement and each of the General Objections as
16 though fully set forth herein.

17 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
21 Statement and General Objections), please refer to the documents produced by LVSC Bates
22 labeled as: LVS00206754 - LVS00206823; LVS00206839 - LVS00206874; LVS00206933;
23 LVS00206934; LVS00206935 - LVS00206936; LVS00207031 - LVS00207040; LVS00207041 -
24 LVS00207048; LVS00207083 - LVS00207084; LVS00207187 - LVS00207191; LVS00207192 -
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5 LVS00229032 - LVS00229036; LVS00229038 - LVS00229043; LVS00229807 - LVS00229808;
6 LVS00230232 - LVS00230273.

7 **REQUEST FOR PRODUCTION NO. 10:**

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

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

14 LVSC incorporates the Preliminary Statement and each of the General Objections as
15 though fully set forth herein.

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

19 Subject to and without waiver of the foregoing objections (including the Preliminary
20 Statement and General Objections), please refer to the documents produced by LVSC Bates
21 labeled as: LVS00209107; LVS00210053 - LVS00210056; LVS00210060 - LVS00210063;
22 LVS00215481 - LVS00215484; LVS00217463 - LVS00217466; LVS00217467 - LVS00217470;
23 LVS00217471 - LVS00217473; LVS00217739; LVS00218145; LVS00218287; LVS00218514;
24 LVS00220991 - LVS00220994; LVS00220995 - LVS00220998; LVS00221951 - LVS00221954;
25 LVS00225766 - LVS00225769; LVS00225770 - LVS00225773; LVS00225774 - LVS00225776.

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

27 Please identify and produce all documents, memoranda, emails, and/or other
28 correspondence that reflect services performed by LVSC (including LVSC's executives and/or

1 employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or
2 concerning site design and development oversight of Parcels 5 and 6, during the time period of
3 January 1, 2009, to October 20, 2010.

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

5 LVSC incorporates the Preliminary Statement and each of the General Objections as
6 though fully set forth herein.

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

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 LVSC Bates
12 labeled as: LVS00206903; LVS00206914; LVS00206917; LVS00206966; LVS00206967 -
13 LVS00206974; LVS00206999 - LVS00207000; LVS00207001 - LVS00207002; LVS00207003 -
14 LVS00207006; LVS00207007 - LVS00207010; LVS00207011 - LVS00207013; LVS00207017 -
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20 LVS00215058 - LVS00215062; LVS00215102 - LVS00215102; LVS00215108 - LVS00215109;
21 LVS00215119 - LVS00215120; LVS00215204 - LVS00215205; LVS00215206 - LVS00215207;
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23 LVS00215317 - LVS00215320; LVS00215321 - LVS00215323; LVS00215324 - LVS00215326;
24 LVS00215327 - LVS00215328; LVS00215330 - LVS00215332; LVS00215354 - LVS00215357;
25 LVS00215361 - LVS00215363; LVS00215464 - LVS00215465; LVS00215468 - LVS00215470;
26 LVS00215481 - LVS00215484; LVS00215525 - LVS00215532; LVS00215543 - LVS00215544;
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16 LVS00217431 - LVS00217433; LVS00217434 - LVS00217435; LVS00217436 - LVS00217437;
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21 LVS00217471 - LVS00217473; LVS00217481 - LVS00217483; LVS00217484 - LVS00217486;
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26 LVS00218356 - LVS00218359; LVS00218364 - LVS00218367; LVS00218382 - LVS00218382;
27 LVS00218383 - LVS00218383; LVS00218404 - LVS00218404; LVS00218406 - LVS00218407;
28 LVS00218408 - LVS00218408; LVS00218422 - LVS00218423; LVS00218424 - LVS00218425;

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3 LVS00218531 - LVS00218532; LVS00218533 - LVS00218534; LVS00218535 - LVS00218535;
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9 LVS00219185 - LVS00219187; LVS00219188 - LVS00219189; LVS00219190 - LVS00219190;
10 LVS00219229 - LVS00219230; LVS00219231 - LVS00219231; LVS00219324 - LVS00219324;
11 LVS00219329 - LVS00219329; LVS00219391 - LVS00219391; LVS00219434 - LVS00219434;
12 LVS00219441 - LVS00219441; LVS00219442 - LVS00219442; LVS00219504 - LVS00219504;
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14 LVS00219696 - LVS00219696; LVS00219707 - LVS00219707; LVS00219709 - LVS00219709;
15 LVS00219738 - LVS00219738; LVS00219741 - LVS00219741; LVS00219765 - LVS00219766;
16 LVS00219767 - LVS00219768; LVS00219769 - LVS00219770; LVS00219771 - LVS00219771;
17 LVS00219772 - LVS00219773; LVS00219774 - LVS00219774; LVS00219860 - LVS00219862;
18 LVS00219869 - LVS00219871; LVS00219880 - LVS00219882; LVS00220205 - LVS00220206;
19 LVS00220225 - LVS00220236; LVS00220297 - LVS00220298; LVS00220299 - LVS00220299;
20 LVS00220323 - LVS00220325; LVS00220338 - LVS00220339; LVS00220357 - LVS00220359;
21 LVS00220392 - LVS00220394; LVS00220405 - LVS00220406; LVS00220407 - LVS00220408;
22 LVS00220409 - LVS00220409; LVS00220411 - LVS00220412; LVS00220437 - LVS00220439;
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24 LVS00220549 - LVS00220550; LVS00220560 - LVS00220564; LVS00220578 - LVS00220581;
25 LVS00220619 - LVS00220622; LVS00220686 - LVS00220690; LVS00220691 - LVS00220694;
26 LVS00220701 - LVS00220703; LVS00220718 - LVS00220720; LVS00220726 - LVS00220727;
27 LVS00220766 - LVS00220768; LVS00220769 - LVS00220770; LVS00220773 - LVS00220775;
28 LVS00220814 - LVS00220815; LVS00220816 - LVS00220816; LVS00220869 - LVS00220873;

1 LVS00220877 - LVS00220881; LVS00220884 - LVS00220888; LVS00220965 - LVS00220965;
2 LVS00220966 - LVS00220966; LVS00220969 - LVS00220972; LVS00220973 - LVS00220976;
3 LVS00220991 - LVS00220994; LVS00220995 - LVS00220998; LVS00221001 - LVS00221004;
4 LVS00221005 - LVS00221008; LVS00221009 - LVS00221011; LVS00221012 - LVS00221015;
5 LVS00221016 - LVS00221018; LVS00221022 - LVS00221024; LVS00221027 - LVS00221028;
6 LVS00221037 - LVS00221039; LVS00221047 - LVS00221054; LVS00221055 - LVS00221061;
7 LVS00221069 - LVS00221070; LVS00221071 - LVS00221075; LVS00221134 - LVS00221135;
8 LVS00221136 - LVS00221142; LVS00221144 - LVS00221144; LVS00221146 - LVS00221146;
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11 LVS00221307 - LVS00221309; LVS00221322 - LVS00221322; LVS00221559 - LVS00221560;
12 LVS00221812 - LVS00221813; LVS00221834 - LVS00221837; LVS00221840 - LVS00221842;
13 LVS00221843 - LVS00221844; LVS00221849 - LVS00221850; LVS00221878 - LVS00221879;
14 LVS00221880 - LVS00221882; LVS00221886 - LVS00221890; LVS00221891 - LVS00221895;
15 LVS00221933 - LVS00221936; LVS00221937 - LVS00221939; LVS00221951 - LVS00221954;
16 LVS00221959 - LVS00221966; LVS00222187 - LVS00222191; LVS00222221 - LVS00222224;
17 LVS00222549 - LVS00222977; LVS00223083 - LVS00223582; LVS00223984 - LVS00223997;
18 LVS00224220 - LVS00224251; LVS00224313 - LVS00224317; LVS00224334 - LVS00224334;
19 LVS00224402 - LVS00224446; LVS00224452 - LVS00224503; LVS00224504 - LVS00224541;
20 LVS00224545 - LVS00224596; LVS00224600 - LVS00224651; LVS00224687 - LVS00224785;
21 LVS00224786 - LVS00224827; LVS00224942 - LVS00224945; LVS00225283 - LVS00225364;
22 LVS00225648 - LVS00225732; LVS00225733 - LVS00225733; LVS00225734 - LVS00225736;
23 LVS00225737 - LVS00225738; LVS00225739 - LVS00225740; LVS00225741 - LVS00225743;
24 LVS00225744 - LVS00225745; LVS00225746 - LVS00225746; LVS00225747 - LVS00225749;
25 LVS00225750 - LVS00225751; LVS00225752 - LVS00225754; LVS00225755 - LVS00225756;
26 LVS00225757 - LVS00225759; LVS00225760 - LVS00225763; LVS00225764 - LVS00225765;
27 LVS00225766 - LVS00225769; LVS00225770 - LVS00225773; LVS00225774 - LVS00225776;
28 LVS00225792 - LVS00225797; LVS00225861 - LVS00225912; LVS00225917 - LVS00225992;

1 LVS00225996 - LVS00226077; LVS00226250 - LVS00226254; LVS00226260 - LVS00226261;
2 LVS00226569 - LVS00226573; LVS00226611 - LVS00226614; LVS00226750 - LVS00226753;
3 LVS00227296 - LVS00227309; LVS00227318 - LVS00227399; LVS00227404 - LVS00227482;
4 LVS00227488 - LVS00227539; LVS00227540 - LVS00227577; LVS00227584 - LVS00227628;
5 LVS00227763 - LVS00228191; LVS00228356 - LVS00228421; LVS00228424 - LVS00228453;
6 LVS00228583 - LVS00229007; LVS00229107 - LVS00229111; LVS00229844 - LVS00229847;
7 LVS00230133 - LVS00230231; LVS00230232 - LVS00230273; LVS00230278 - LVS00230282;
8 LVS00230299 - LVS00230299; LVS00230413 - LVS00230444; LVS00230588 - LVS00230653;
9 LVS00230656 - LVS00230685; LVS00230800 - LVS00230803; LVS00230829 - LVS00230844;
10 LVS00230877 - LVS00230881; LVS00230982 - LVS00230985.

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

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

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

18 LVSC incorporates the Preliminary Statement and each of the General Objections as
19 though fully set forth herein.

20 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
24 Statement and General Objections), please refer to the documents produced by LVSC Bates
25 labeled as: LVS00206904; LVS00206907; LVS00206953; LVS00206954 - LVS00206955;
26 LVS00206956; LVS00206957; LVS00206958 - LVS00206962; LVS00206984 - LVS00206986;
27 LVS00206989 - LVS00206991; LVS00206992 - LVS00206995; LVS00206996 - LVS00206998;
28 LVS00207334 - LVS00207336; LVS00207344 - LVS00207346; LVS00207347 - LVS00207348;

1 LVS00207349; LVS00207609; LVS00208050; LVS00208051 - LVS00208052; LVS00208160;
2 LVS00208474; LVS00208475 - LVS00208482; LVS00208547 - LVS00208549; LVS00208550 -
3 LVS00208551; LVS00208742 - LVS00208745; LVS00208746 - LVS00208748; LVS00208758 -
4 LVS00208758; LVS00208766; LVS00208829 - LVS00208833; LVS00208838 - LVS00208839;
5 LVS00208883 - LVS00208886; LVS00208892 - LVS00208895; LVS00208906 - LVS00208909;
6 LVS00208920 - LVS00208921; LVS00208924 - LVS00208926; LVS00208930 - LVS00208932;
7 LVS00208933 - LVS00208934; LVS00208969 - LVS00208971; LVS00208974 - LVS00208977;
8 LVS00208979 - LVS00208981; LVS00208985 - LVS00208987; LVS00209072; LVS00209073 -
9 LVS00209074; LVS00209292 - LVS00209292; LVS00209324 - LVS00209324; LVS00209661 -
10 LVS00209661; LVS00209891 - LVS00209892; LVS00209898 - LVS00209899; LVS00209900;
11 LVS00209901; LVS00209902; LVS00209928 - LVS00209929; LVS00209930; LVS00210052;
12 LVS00210067; LVS00210185 - LVS00210186; LVS00210217; LVS00210367; LVS00210900;
13 LVS00210902 - LVS00210904; LVS00210905 - LVS00210906; LVS00210907; LVS00211229;
14 LVS00211842 - LVS00211844; LVS00211845 - LVS00211846; LVS00211847 - LVS00211848;
15 LVS00212106 - LVS00212107; LVS00212197 - LVS00212197; LVS00212198 - LVS00212198;
16 LVS00212219; LVS00212279 - LVS00212282; LVS00212288 - LVS00212290; LVS00212291 -
17 LVS00212292; LVS00212293 - LVS00212294; LVS00212462 - LVS00212463; LVS00212467;
18 LVS00212468 - LVS00212473; LVS00212525; LVS00212526; LVS00212527 - LVS00212531;
19 LVS00212532 - LVS00212533; LVS00212534; LVS00212562 - LVS00212567; LVS00212568 -
20 LVS00212572; LVS00212573 - LVS00212577; LVS00212632; LVS00212695 - LVS00212696;
21 LVS00212846 - LVS00212847; LVS00212933; LVS00212939 - LVS00212940; LVS00212975;
22 LVS00212976; LVS00212977 - LVS00212986; LVS00212987; LVS00212988; LVS00212989 -
23 LVS00212990; LVS00213079 - LVS00213080; LVS00213143 - LVS00213145; LVS00213146 -
24 LVS00213147; LVS00213148; LVS00213150 - LVS00213151; LVS00213297 - LVS00213298;
25 LVS00213299; LVS00213300; LVS00213331 - LVS00213332; LVS00213333 - LVS00213342;
26 LVS00213343 - LVS00213344; LVS00213350; LVS00213351; LVS00213371 - LVS00213373;
27 LVS00213374 - LVS00213375; LVS00213380 - LVS00213381; LVS00213436 - LVS00213437;
28 LVS00213438 - LVS00213439; LVS00213477 - LVS00213478; LVS00213496 - LVS00213497;

1 LVS00213498 - LVS00213504; LVS00213512 - LVS00213514; LVS00213517 - LVS00213518;
2 LVS00213519; LVS00213530; LVS00213537 - LVS00213538; LVS00213540; LVS00213541;
3 LVS00213643 - LVS00213644; LVS00213710 - LVS00213711; LVS00213734 - LVS00213735;
4 LVS00213736; LVS00213737; LVS00213738; LVS00213797; LVS00213889 - LVS00213890;
5 LVS00213891 - LVS00213893; LVS00213894 - LVS00213895; LVS00213896; LVS00213902 -
6 LVS00213903; LVS00213904 - LVS00213914; LVS00213915 - LVS00213916; LVS00213927 -
7 LVS00213931; LVS00213984 - LVS00213986; LVS00213991; LVS00214035 - LVS00214038;
8 LVS00214216 - LVS00214218; LVS00214636 - LVS00214638; LVS00214639 - LVS00214641;
9 LVS00214642 - LVS00214644; LVS00214781 - LVS00214783; LVS00214975 - LVS00214977;
10 LVS00215048; LVS00215049 - LVS00215052; LVS00215065 - LVS00215067; LVS00215071 -
11 LVS00215073; LVS00215074 - LVS00215075; LVS00215079; LVS00215083 - LVS00215086;
12 LVS00215087 - LVS00215090; LVS00215092 - LVS00215094; LVS00215100 - LVS00215101;
13 LVS00215451 - LVS00215452; LVS00215453; LVS00215456; LVS00215480; LVS00215767;
14 LVS00215908 - LVS00215909; LVS00215960; LVS00216009 - LVS00216012; LVS00216029;
15 LVS00216047; LVS00216069 - LVS00216074; LVS00216075 - LVS00216079; LVS00216096;
16 LVS00216114 - LVS00216115; LVS00216116; LVS00216117; LVS00216129 - LVS00216131;
17 LVS00216134 - LVS00216135; LVS00216154 - LVS00216155; LVS00216156 - LVS00216157;
18 LVS00216158; LVS00216159; LVS00216160 - LVS00216169; LVS00216204 - LVS00216205;
19 LVS00216206; LVS00216207; LVS00216223 - LVS00216224; LVS00216259 - LVS00216260;
20 LVS00216261; LVS00216262; LVS00216263 - LVS00216264; LVS00216316; LVS00216325 -
21 LVS00216326; LVS00216362 - LVS00216363; LVS00216364 - LVS00216365; LVS00216371 -
22 LVS00216372; LVS00216375 - LVS00216376; LVS00216380 - LVS00216381; LVS00216383;
23 LVS00216399 - LVS00216401; LVS00216402; LVS00216403 - LVS00216404; LVS00216409 -
24 LVS00216410; LVS00216418 - LVS00216420; LVS00216422 - LVS00216423; LVS00216712;
25 LVS00217543; LVS00217544 - LVS00217555; LVS00217563; LVS00217564 - LVS00217575;
26 LVS00217582 - LVS00217582; LVS00217583 - LVS00217594; LVS00217595; LVS00217596 -
27 LVS00217607; LVS00217702; LVS00217741 - LVS00217742; LVS00217743; LVS00218227;
28 LVS00218244 - LVS00218248; LVS00218588; LVS00218596 - LVS00218599; LVS00218600 -

1 LVS00218602; LVS00218603 - LVS00218605; LVS00218606 - LVS00218607; LVS00218608 -
2 LVS00218609; LVS00218623; LVS00218699 - LVS00218700; LVS00218701; LVS00218769;
3 LVS00218770 - LVS00218781; LVS00219043 - LVS00219044; LVS00219045; LVS00219071 -
4 LVS00219072; LVS00219073 - LVS00219074; LVS00219299; LVS00219314 - LVS00219318;
5 LVS00219397 - LVS00219398; LVS00219399; LVS00219438 - LVS00219439; LVS00219446;
6 LVS00219447 - LVS00219453; LVS00219508; LVS00219510 - LVS00219510; LVS00219526 -
7 LVS00219527; LVS00219528; LVS00219710; LVS00219711 - LVS00219722; LVS00219883 -
8 LVS00219887; LVS00220448 - LVS00220452; LVS00221040; LVS00221282; LVS00221293 -
9 LVS00221296; LVS00221298 - LVS00221300; LVS00221301 - LVS00221302; LVS00221571 -
10 LVS00221572; LVS00221578 - LVS00221579; LVS00221950; LVS00221989 - LVS00221992;
11 LVS00221996; LVS00222004; LVS00222030; LVS00222073 - LVS00222074; LVS00222119 -
12 LVS00222120.

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

14 Please identify and produce all documents, memoranda, emails, and/or other
15 correspondence that reflect services performed by LVSC (including LVSC's executives and/or
16 employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or
17 concerning marketing of Sands China properties, including its frequency program, the issuance of
18 "Chairman's Club" cards by Sheldon G. Adelson to Cheung Chi Tai, Jack Lam and others, credit
19 limits, floor layouts, the removal of Cheung Chi Tai, Charles Heung Wah Keung, and others from
20 the Guarantor list of VIP promoters, nightclub operations and approval, including but not limited
21 to Lotus Night Club, and/or the hiring of outside consultants, during the time period of January 1,
22 2009, to October 20, 2010.

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

24 LVSC incorporates the Preliminary Statement and each of the General Objections as
25 though fully set forth herein.

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

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 LVSC Bates
3 labeled as: LVS00206890; LVS00206898; LVS00206899; LVS00206900; LVS00206908;
4 LVS00206981 - LVS00206983; LVS00207020 - LVS00207022; LVS00207023 - LVS00207025;
5 LVS00207050 - LVS00207064; LVS00207114 - LVS00207116; LVS00207122 - LVS00207125;
6 LVS00207128 - LVS00207130; LVS00207131 - LVS00207133; LVS00207167 - LVS00207169;
7 LVS00207170 - LVS00207172; LVS00207175 - LVS00207177; LVS00207225; LVS00207226;
8 LVS00207227; LVS00207239 - LVS00207240; LVS00207241; LVS00207306; LVS00207316;
9 LVS00207317; LVS00207318 - LVS00207319; LVS00207469 - LVS00207471; LVS00207479 -
10 LVS00207483; LVS00207484 - LVS00207487; LVS00207492; LVS00207493; LVS00207650;
11 LVS00207651; LVS00207654 - LVS00207655; LVS00207656; LVS00207688; LVS00207703;
12 LVS00207708; LVS00207807 - LVS00207809; LVS00207810 - LVS00207811; LVS00207812 -
13 LVS00207813; LVS00207814 - LVS00207816; LVS00207821; LVS00207898 - LVS00207916;
14 LVS00207984 - LVS00208005; LVS00208043 - LVS00208044; LVS00208049; LVS00208145;
15 LVS00208146 - LVS00208148; LVS00208161 - LVS00208163; LVS00208184 - LVS00208185;
16 LVS00208210; LVS00208221; LVS00208225; LVS00208226 - LVS00208227; LVS00208228;
17 LVS00208261; LVS00208285 - LVS00208286; LVS00208310 - LVS00208312; LVS00208313 -
18 LVS00208315; LVS00208454 - LVS00208454; LVS00208544; LVS00208808; LVS00208811;
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Las Vegas, Nevada 89134

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23 LVS00230934; LVS00230935 - LVS00230936; LVS00230937 - LVS00230939; LVS00230940 -
24 LVS00230942.

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

26 Please identify and produce all documents, memoranda, emails, and/or other
27 correspondence that reflect services performed by LVSC or the involvement of LVSC executives
28 (including LVSC's executives and/or employees and/or consultants and/or agents) for or on

1 behalf of Sands China, related to and/or concerning negotiation of a possible joint venture
2 between Sands China and Harrah's, during the time period of January 1, 2009, to October 20,
3 2010 if such documents exist.

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

5 LVSC incorporates the Preliminary Statement and each of the General Objections as
6 though fully set forth herein.

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

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 LVSC Bates
12 labeled as: LVS00207659 - LVS00207660; LVS00207671 - LVS00207672; LVS00207709 -
13 LVS00207710; LVS00208110 - LVS00208111; LVS00208116 - LVS00208117; LVS00208455;
14 LVS00208490; LVS00214268 - LVS00214270; LVS00214363; LVS00214367 - LVS00214368;
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17 LVS00217110; LVS00217577 - LVS00217578; LVS00217698 - LVS00217699; LVS00217932 -
18 LVS00217934; LVS00218279; LVS00218282 - LVS00218284; LVS00219700; LVS00221424 -
19 LVS00221426.

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

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

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

25 LVSC incorporates the Preliminary Statement and each of the General Objections as
26 though fully set forth herein.

27 LVSC also objects to this request to the extent it calls for the disclosure of information
28 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 Subject to and without waiver of the foregoing objections (including the Preliminary

3 Statement and General Objections), please refer to the documents produced by LVSC Bates

4 labeled as: LVS00206912; LVS00206913; LVS00207391 - LVS00207392; LVS00207414;

5 LVS00207430; LVS00207544; LVS00208828; LVS00208875; LVS00208941 - LVS00208944;

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12 LVS00209302 - LVS00209303; LVS00209304 - LVS00209305; LVS00209309 - LVS00209310;

13 LVS00209336 - LVS00209336; LVS00209342 - LVS00209347; LVS00209384 - LVS00209390;

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22 LVS00211374 - LVS00211376; LVS00211377 - LVS00211378; LVS00211418 - LVS00211419;

23 LVS00211618; LVS00211619; LVS00211620 - LVS00211622; LVS00211661 - LVS00211662;

24 LVS00211895 - LVS00211896; LVS00211897 - LVS00211900; LVS00212233; LVS00212276 -

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2 LVS00229806; LVS00229807 - LVS00229808.

3 **REQUEST FOR PRODUCTION NO. 17:**

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

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

8 LVSC incorporates the Preliminary Statement and each of the General Objections as
9 though fully set forth herein.

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

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 LVSC Bates
15 labeled as: LVS00206837; LVS00206838; LVS00206891 - LVS00206892; LVS00206893 -
16 LVS00206895; LVS00206901; LVS00206946 - LVS00206948; LVS00207106; LVS00207107;
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13 LVS00217657 - LVS00217657; LVS00217925 - LVS00217926; LVS00218002 - LVS00218003;
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LVS00224215 - LVS00224215; LVS00225777; LVS00226748 - LVS00226749.

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:

LVSC incorporates the Preliminary Statement and each of the General Objections as
though fully set forth herein.

1 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
5 Statement and General Objections), please refer to the documents produced by LVSC Bates
6 labeled as: LVS00209147 - LVS00209148; LVS00209187; LVS00209532 - LVS00209536;
7 LVS00209538 - LVS00209542; LVS00209544 - LVS00209548; LVS00209590 - LVS00209592;
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19 LVS00218655 - LVS00218656; LVS00219431 - LVS00219432; LVS00219511; LVS00220473 -
20 LVS00220474; LVS00220565 - LVS00220577; LVS00220920 - LVS00220921; LVS00221136 -
21 LVS00221142; LVS00221144; LVS00221145; LVS00227171 - LVS00227174; LVS00230066 -
22 LVS00230069.

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

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

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

28 LVSC incorporates the Preliminary Statement and each of the General Objections as

1 though fully set forth herein. LVSC objects to this request as beyond the scope of discovery
2 authorized by the Court insofar as it is not limited to communications that occurred in Nevada and
3 that concerned SCL. LVSC also objects to this request as overbroad and unduly burdensome
4 insofar as it seeks "all documents" responsive to the request, rather than an illustrative subset of
5 documents that are sufficient for Plaintiff to make his arguments on personal jurisdiction.

6 LVSC 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 General Objections), please refer to documents bates labeled as: LVS00212555;
11 LVS00212610 - LVS00212612; LVS00214248; LVS00214249 - LVS00214250; LVS00214265 -
12 LVS00214267; LVS00214268 - LVS00214270; LVS00214338; LVS00216503; LVS00216504 -
13 LVS00216505; LVS00216971; LVS00217109 - LVS00217110; LVS00217111 - LVS00217112;
14 LVS00217577 - LVS00217578; LVS00217623 - LVS00217624; LVS00217625 - LVS00217626;
15 LVS00217654 - LVS00217656; LVS00217658 - LVS00217660; LVS00217661 - LVS00217662;
16 LVS00217663 - LVS00217665; LVS00217666 - LVS00217667; LVS00218147 - LVS00218155;
17 LVS00218156 - LVS00218164; LVS00218165 - LVS00218172; LVS00218173 - LVS00218179;
18 LVS00218180 - LVS00218186; LVS00218194 - LVS00218200; LVS00218203 - LVS00218208;
19 LVS00218209 - LVS00218213; LVS00218216 - LVS00218220; LVS00218235 - LVS00218238;
20 LVS00218240 - LVS00218242; LVS00218253 - LVS00218255; LVS00218256 - LVS00218257;
21 LVS00218261 - LVS00218262; LVS00218267; LVS00218282 - LVS00218284; LVS00218410;
22 LVS00218411; LVS00218467; LVS00218468 - LVS00218469; LVS00218474 - LVS00218475;
23 LVS00218480 - LVS00218481; LVS00218739; LVS00218782; LVS00219114; LVS00219117;
24 LVS00219238 - LVS00219246; LVS00219252 - LVS00219260; LVS00219261 - LVS00219268;
25 LVS00219269 - LVS00219275; LVS00219276 - LVS00219282; LVS00219283 - LVS00219288;
26 LVS00219291 - LVS00219295; LVS00219309 - LVS00219312; LVS00219320 - LVS00219321;
27 LVS00219325 - LVS00219325; LVS00219363 - LVS00219365; LVS00219513 - LVS00219515;
28 LVS00219516 - LVS00219517; LVS00219697 - LVS00219698; LVS00219700; LVS00219727 -

1 LVS00219728; LVS00220460 - LVS00220465; LVS00220466 - LVS00220470; LVS00221424 -
2 LVS00221426.

3 **REQUEST FOR PRODUCTION NO. 21:**

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

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

9 LVSC incorporates the Preliminary Statement and each of the General Objections as
10 though fully set forth herein.

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

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 LVSC Bates
16 labeled as: LVS00206914; LVS00206915 - LVS00206916; LVS00206966; LVS00206967 -
17 LVS00206974; LVS00207027 - LVS00207028; LVS00207029; LVS00207202 - LVS00207213;
18 LVS00207282 - LVS00207286; LVS00207323; LVS00207324 - LVS00207327; LVS00207417 -
19 LVS00207422; LVS00207424 - LVS00207428; LVS00207436 - LVS00207439; LVS00207444 -
20 LVS00207446; LVS00207452 - LVS00207454; LVS00207455 - LVS00207457; LVS00207463 -
21 LVS00207465; LVS00207489 - LVS00207490; LVS00207491; LVS00207626; LVS00207627 -
22 LVS00207629; LVS00207676 - LVS00207687; LVS00207792 - LVS00207796; LVS00207799 -
23 LVS00207802; LVS00208125 - LVS00208127; LVS00208181; LVS00208222 - LVS00208223;
24 LVS00208231 - LVS00208232; LVS00208245 - LVS00208246; LVS00208247; LVS00208436 -
25 LVS00208437; LVS00208450 - LVS00208451; LVS00208462 - LVS00208463; LVS00208464 -
26 LVS00208473; LVS00208488; LVS00208545 - LVS00208546; LVS00208622; LVS00208629;
27 LVS00208660; LVS00208689; LVS00208690 - LVS00208692; LVS00208758; LVS00208766;
28 LVS00208787; LVS00208872 - LVS00208873; LVS00208962; LVS00209118 - LVS00209119;

1 LVS00209150 - LVS00209154; LVS00209221 - LVS00209224; LVS00209368 - LVS00209370;
2 LVS00209501 - LVS00209504; LVS00209514 - LVS00209517; LVS00209523 - LVS00209525;
3 LVS00209529 - LVS00209530; LVS00209656 - LVS00209657; LVS00209830 - LVS00209833;
4 LVS00209834 - LVS00209835; LVS00209836 - LVS00209837; LVS00210053 - LVS00210056;
5 LVS00210060 - LVS00210063; LVS00210065; LVS00210068 - LVS00210070; LVS00210071 -
6 LVS00210072; LVS00210103; LVS00210236; LVS00210770 - LVS00210771; LVS00210773 -
7 LVS00210776; LVS00210803 - LVS00210804; LVS00210806 - LVS00210809; LVS00211599 -
8 LVS00211604; LVS00212138 - LVS00212139; LVS00212140 - LVS00212141; LVS00212265 -
9 LVS00212267; LVS00214103; LVS00214110; LVS00214120 - LVS00214122; LVS00214127;
10 LVS00214131; LVS00214159; LVS00214160; LVS00214166 - LVS00214168; LVS00214186 -
11 LVS00214187; LVS00214188 - LVS00214189; LVS00214226; LVS00214227 - LVS00214229;
12 LVS00214242 - LVS00214243; LVS00214281 - LVS00214284; LVS00214285 - LVS00214287;
13 LVS00214288 - LVS00214290; LVS00214291 - LVS00214292; LVS00214553 - LVS00214561;
14 LVS00214603; LVS00214665; LVS00214832 - LVS00214834; LVS00214839 - LVS00214841;
15 LVS00214873 - LVS00214876; LVS00214892 - LVS00214894; LVS00214961 - LVS00214962;
16 LVS00214983 - LVS00214983; LVS00215025 - LVS00215026; LVS00215031; LVS00215354 -
17 LVS00215357; LVS00215361 - LVS00215363; LVS00215364 - LVS00215366; LVS00215481 -
18 LVS00215484; LVS00215913 - LVS00215914; LVS00215988 - LVS00215990; LVS00216529 -
19 LVS00216532; LVS00216533 - LVS00216535; LVS00216569; LVS00216758 - LVS00216767;
20 LVS00217389 - LVS00217389; LVS00217390 - LVS00217397; LVS00217430; LVS00217431 -
21 LVS00217433; LVS00217434 - LVS00217435; LVS00217436 - LVS00217437; LVS00217438 -
22 LVS00217440; LVS00217441 - LVS00217442; LVS00217443; LVS00217444 - LVS00217446;
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25 LVS00217463 - LVS00217466; LVS00217467 - LVS00217470; LVS00217471 - LVS00217473;
26 LVS00217481 - LVS00217483; LVS00217484 - LVS00217486; LVS00217487 - LVS00217490;
27 LVS00217494 - LVS00217496; LVS00218529 - LVS00218530; LVS00218531 - LVS00218532;
28 LVS00218533 - LVS00218534; LVS00218535 - LVS00218535; LVS00218632 - LVS00218635;

1 LVS00219049 - LVS00219050; LVS00219051 - LVS00219052; LVS00219053; LVS00219532 -
2 LVS00219534; LVS00219535 - LVS00219536; LVS00219765 - LVS00219766; LVS00219767 -
3 LVS00219768; LVS00219769 - LVS00219770; LVS00219771; LVS00220357 - LVS00220359;
4 LVS00220367; LVS00220405 - LVS00220406; LVS00220407 - LVS00220408; LVS00220409;
5 LVS00220686 - LVS00220690; LVS00220691 - LVS00220694; LVS00220701 - LVS00220703;
6 LVS00220969 - LVS00220972; LVS00220973 - LVS00220976; LVS00220977 - LVS00220979;
7 LVS00220980 - LVS00220981; LVS00220991 - LVS00220994; LVS00220995 - LVS00220998;
8 LVS00221000; LVS00221046; LVS00221834 - LVS00221837; LVS00221840 - LVS00221842;
9 LVS00221933 - LVS00221936; LVS00221937 - LVS00221939; LVS00221940 - LVS00221942;
10 LVS00221951 - LVS00221954; LVS00225283 - LVS00225364; LVS00225733; LVS00225734 -
11 LVS00225736; LVS00225737 - LVS00225738; LVS00225739 - LVS00225740; LVS00225741 -
12 LVS00225743; LVS00225744 - LVS00225745; LVS00225746; LVS00225747 - LVS00225749;
13 LVS00225750 - LVS00225751; LVS00225752 - LVS00225754; LVS00225755 - LVS00225756;
14 LVS00225757 - LVS00225759; LVS00225760 - LVS00225763; LVS00225764 - LVS00225765;
15 LVS00225766 - LVS00225769; LVS00225770 - LVS00225773; LVS00225774 - LVS00225776.

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

17 To the extent not produced in response to the preceding requests, please identify and
18 produce all documents, memoranda, emails, and/or other correspondence that reflect services
19 performed by LVSC (including LVSC's executives and/or employees and/or consultants and/or
20 agents) for or on behalf of Sands China, during the time period of January 1, 2009, to October 20,
21 2010, including, but not limited to, Yvonne Mao, directions given to Mr. Yueng and/or Eric Chu
22 relating to Hengquin Island, Chu Kong Shipping ("CKS"), the basketball team, the Adelson
23 Center in Beijing, and investigations related to the same; negotiations with Four Seasons,
24 Sheraton and Shangri-La; bonus and remuneration plans; outside counsel's review of Leonel
25 Alves, Foreign Corrupt Practices Act issues and his suitability to serve as counsel for Sands China
26 Limited; International Risk reports on Cheung Chi Tai, Charles Heung, and others commissioned
27 in response to the Reuters' article alleging organized crime; and collection activities relating to
28 patrons and junkets with large outstanding debts due Sands China and/or its subsidiaries.

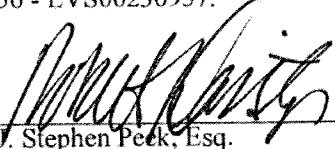
RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

LVSC incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein.

LVSC 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.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), please refer to the documents produced by LVSC Bates labeled as: LVS00206905; LVS00206975 - LVS00206976; LVS00211455; LVS00211527; LVS00212231 - LVS00212232; LVS00212372 - LVS00212374; LVS00212745 - LVS00212747; LVS00212748 - LVS00212749; LVS00212750 - LVS00212751; LVS00212794; LVS00212923 - LVS00212924; LVS00212926; LVS00212934; LVS00212957; LVS00212964 - LVS00212965; LVS00212966; LVS00212973; LVS00212974; LVS00213101; LVS00213121; LVS00213580 - LVS00213585; LVS00213590; LVS00213604; LVS00214633 - LVS00214634; LVS00216118 - LVS00216120; LVS00216121 - LVS00216123; LVS00216124 - LVS00216125; LVS00216170 - LVS00216171; LVS00216176; LVS00216180; LVS00216181; LVS00216190; LVS00216194 - LVS00216195; LVS00216196 - LVS00216197; LVS00216208 - LVS00216209; LVS00219401 - LVS00219402; LVS00219403 - LVS00219404; LVS00221440 - LVS00221441; LVS00221454 - LVS00221455; LVS00221456; LVS00221457; LVS00221458; LVS00221464; LVS00221469; LVS00222005 - LVS00222007; LVS00222008 - LVS00222010; LVS00222011 - LVS00222012; LVS00222013 - LVS00222014; LVS00222015 - LVS00222016; LVS00222017 - LVS00222018; LVS00225107 - LVS00225108; LVS00230956 - LVS00230957.

DATED October 3, 2012.


J. Stephen Peek, Esq.
Robert J. Cassity, Esq.
Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

*Attorneys for Las Vegas Sands Corp. and Sands
China Ltd.*

1 LVS00155865; LVS00155866-LVS00155911; LVS00155943-LVS00155976; LVS00155977;
2 LVS00155978-LVS00155981; LVS00155982-LVS00155984; LVS00155985-LVS00155988;
3 LVS00155989-LVS00155990; LVS00155991-LVS00155994; LVS00155995-LVS00155997;
4 LVS00155998-LVS00156000; LVS00156006; LVS00156011-LVS00156014; LVS00156015;
5 LVS00156070-LVS00156074; LVS00156081; LVS00156082; LVS00156139; LVS00156142;
6 LVS00156146; LVS00156147-LVS00156149; LVS00156151-LVS00156152; LVS00156458-
7 LVS00156493; LVS00157394-LVS00157395; LVS00157400; LVS00157403; LVS00157405-
8 LVS00157407; LVS00157411-LVS00157416; LVS00157417-LVS00157421; LVS00157429-
9 LVS00157435; LVS00157436-LVS00157438; LVS00157609-LVS00157611; LVS00157616-
10 LVS00157617; LVS00157618-LVS00157621; LVS00157622-LVS00157623; LVS00157624-
11 LVS00157626; LVS00158001-LVS00158004; LVS00158005-LVS00158008; LVS00158009-
12 LVS00158010; LVS00158028; LVS00158031; LVS00158032-LVS00158046; LVS00158047-
13 LVS00158048; LVS00158049; LVS00158476-LVS00158478; LVS00158479-LVS00158480;
14 LVS00158484-LVS00158485; LVS00158486-LVS00158486; LVS00158487-LVS00158492;
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16 LVS00158503; LVS00158673-LVS00158675; LVS00158676-LVS00158678; LVS00158679-
17 LVS00158681; LVS00158682-LVS00158683; LVS00158684-LVS00158685; LVS00158686-
18 LVS00158687; LVS00158788-LVS00158837; LVS00158839-LVS00158871; LVS00158933;
19 LVS00159046-LVS00159048; LVS00159049-LVS00159049; LVS00159050-LVS00159051;
20 LVS00159122-LVS00159141; LVS00159476-LVS00159507; LVS00159635-LVS00159636;
21 LVS00159637-LVS00159638; LVS00159644; LVS00159659-LVS00159660; LVS00161927-
22 LVS00161930; LVS00161931-LVS00161934; LVS00163755-LVS00163756; LVS00163757;
23 LVS00163758-LVS00163760; LVS00171652-LVS00171654; LVS00173577; LVS00173583-
24 LVS00173584; LVS00173585; LVS00173587-LVS00173588; LVS00173621-LVS00173622;
25 LVS00173623-LVS00173627; LVS00173628-LVS00173822; LVS00173849; LVS00173854-
26 LVS00173855; LVS00173872-LVS00174303; LVS00174308; LVS00174360-LVS00174361;
27 LVS00174378-LVS00174809; LVS00174814; LVS00174865-LVS00174866; LVS00174883-
28 LVS00175314; LVS00175319-LVS00175322; LVS00175373; LVS00175374-LVS00175375;

1 LVS00175376-LVS00175376; LVS00175378-LVS00175379; LVS00175584-LVS00175585;
2 LVS00175595-LVS00175597; LVS00175604; LVS00175664-LVS00175668; LVS00175671-
3 LVS00175675; LVS00175676-LVS00175678; LVS00175679-LVS00175680; LVS00175681-
4 LVS00175682; LVS00175733-LVS00175735; LVS00175736-LVS00175738; LVS00175739-
5 LVS00175740; LVS00175741-LVS00175742; LVS00175743-LVS00175744; LVS00175746-
6 LVS00175751; LVS00175752-LVS00175754; LVS00175971-LVS00175972; LVS00175973;
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13 LVS00177392; LVS00177393-LVS00177395; LVS00177396-LVS00177398; LVS00177399-
14 LVS00177401; LVS00177573; LVS00178000; LVS00178235; LVS00178236; LVS00178237;
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18 LVS00178349; LVS00178575-LVS00178576; LVS00178593-LVS00179024; LVS00179029;
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21 LVS00179160; LVS00179161; LVS00179162; LVS00179166; LVS00179190; LVS00179193;
22 LVS00179194-LVS00179195; LVS00179196; LVS00179197-LVS00179198; LVS00179199-
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24 LVS00179207; LVS00179209; LVS00179210-LVS00179211; LVS00179243-LVS00179244;
25 LVS00179253; LVS00179254-LVS00179255; LVS00179362-LVS00179364; LVS00179396-
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8 LVS00180072-LVS00180075; LVS00180076; LVS00180288; LVS00181963-LVS00181994;
9 LVS00184021-LVS00184520; LVS00184554-LVS00185056; LVS00185060-LVS00185079;
10 LVS00185081-LVS00185516; LVS00185521-LVS00185539; LVS00185558-LVS00185577;
11 LVS00185582-LVS00185601; LVS00186052-LVS00186491; LVS00186496-LVS00186508;
12 LVS00186524-LVS00186536; LVS00186644-LVS00186654; LVS00186662-LVS00186674;
13 LVS00186682-LVS00186694; LVS00186702-LVS00186715; LVS00186723-LVS00186736;
14 LVS00186749-LVS00186762; LVS00186922-LVS00186936; LVS00186954-LVS00186954;
15 LVS00187092; LVS00187093-LVS00187094; LVS00187095; LVS00187096-LVS00187110;
16 LVS00187111; LVS00187114-LVS00187115; LVS00187132-LVS00187563; LVS00187568-
17 LVS00187576; LVS00187627-LVS00187627; LVS00187628-LVS00187663; LVS00187664-
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19 LVS00191837; LVS00191838; LVS00191840-LVS00191846; LVS00191847-LVS00191848;
20 LVS00191854-LVS00191855; LVS00191864-LVS00191872; LVS00191873-LVS00191874;
21 LVS00191875-LVS00191876; LVS00191877-LVS00191878; LVS00191879-LVS00191882;
22 LVS00191883-LVS00191886; LVS00191888; LVS00191891; LVS00191893-LVS00191897;
23 LVS00191898-LVS00191900; LVS00194758; LVS00194759-LVS00194760; LVS00194766;
24 LVS00194776-LVS00194777; LVS00194793-LVS00194794; LVS00194795-LVS00194796;
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26 LVS00194810; LVS00194811-LVS00194812; LVS00194813-LVS00194815; LVS00194816-
27 LVS00194828; LVS00194829-LVS00194833; LVS00194836-LVS00194840; LVS00194853-
28 LVS00194854; LVS00194855-LVS00194856; LVS00194860; LVS00194864-LVS00194865;

1 LVS00194871-LVS00194872; LVS00194873-LVS00194874; LVS00194875-LVS00194876;
2 LVS00194877-LVS00194878; LVS00194966-LVS00194967; LVS00195015; LVS00195017-
3 LVS00195018; LVS00195019-LVS00195020; LVS00195021; LVS00195083; LVS00195125;
4 LVS00195197; LVS00195220; LVS00195243; LVS00195244; LVS00195245; LVS00195292-
5 LVS00195294; LVS00195305-LVS00195306; LVS00195307-LVS00195308; LVS00195309-
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LVS00206358-LVS00206359; LVS00206360-LVS00206361; LVS00206362.

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:

1 LVSC incorporates the Preliminary Statement and each of the General Objections as
2 though fully set forth herein.

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

6 Subject to and without waiver of the foregoing objections (including the Preliminary
7 Statement and General Objections), please refer to the documents produced by LVSC Bates
8 labeled as: LVS00144163-LVS00144232; LVS00144638-LVS00144773; LVS00144802;
9 LVS00144803-LVS00144906; LVS00144907; LVS00144920; LVS00144948-LVS00145001;
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21 LVS00201605; LVS00201611-LVS00201613; LVS00201614-LVS00201616; LVS00201621-
22 LVS00201626; LVS00201743-LVS00201899; LVS00201902-LVS00201903; LVS00201911;
23 LVS00201912; LVS00201913-LVS00201915; LVS00201916-LVS00201919; LVS00201927-
24 LVS00201928; LVS00201948; LVS00201949-LVS00201958; LVS00201959-LVS00201985;
25 LVS00202185-LVS00202254; LVS00202387; LVS00202388-LVS00202397; LVS00202398-
26 LVS00202424; LVS00202785-LVS00202787; LVS00202788; LVS00202829-LVS00202831;
27 LVS00203155-LVS00203288; LVS00203301-LVS00203427; LVS00203529-LVS00203745;
28 LVS00203766; LVS00203767-LVS00203779; LVS00203780-LVS00203785; LVS00203821-

1 LVS00203823; LVS00203825-LVS00203828; LVS00203829-LVS00203834; LVS00203835;
2 LVS00203836-LVS00203848; LVS00203849-LVS00203854; LVS00203859-LVS00203861;
3 LVS00203992-LVS00203993; LVS00203999-LVS00204068; LVS00204206-LVS00204208;
4 LVS00204323-LVS00204539; LVS00204632-LVS00204848; LVS00205547-LVS00205616;
5 LVS00205749-LVS00205751; LVS00205752-LVS00205757; LVS00205912; LVS00205913-
6 LVS00205925; LVS00205926-LVS00205931; LVS00205933-LVS00205934; LVS00206074-
7 LVS00206095; LVS00206096-LVS00206117; LVS00206363-LVS00206432.

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

9 Please identify and produce all documents that reflect work Robert G. Goldstein
10 performed for or on behalf of Sands China, during the time period of January 1, 2009, to October
11 20, 2010, including global gaming and/or international player development efforts, such as active
12 recruitment of VIP players to share between and among LVSC and Sands China properties,
13 details concerning trips with Larry Chu into China to recruit new VIP players, dinners and/or
14 meetings with Cheung Chi Tai, Charles Heung Wah Keung, and/or other VIP promoters, players
15 funding, the transfer of players funds, and the use of Venetian Marketing Services Limited
16 ("VMSL") and/or other entities to secure players and facilitate money transfers.

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

18 LVSC incorporates the Preliminary Statement and each of the General Objections as
19 though fully set forth herein.

20 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
24 Statement and General Objections), please refer to the documents produced by LVSC Bates
25 labeled as: LVS00144557; LVS00144558; LVS00144559; LVS00144560-LVS00144564;
26 LVS00144565; LVS00144566; LVS00144567-LVS00144569; LVS00144570-LVS00144571;
27 LVS00144572-LVS00144576; LVS00144577-LVS00144578; LVS00144579-LVS00144582;
28 LVS00144583; LVS00144584; LVS00144585; LVS00144586-LVS00144587; LVS00144588-

1 LVS00144589; LVS00144590-LVS00144592; LVS00144593; LVS00144594-LVS00144599;
2 LVS00144600-LVS00144602; LVS00144603; LVS00144604-LVS00144605; LVS00144790-
3 LVS00144792; LVS00144798-LVS00144799; LVS00144800; LVS00144801; LVS00145451-
4 LVS00145452; LVS00145663; LVS00148747-LVS00148748; LVS00148809; LVS00153694;
5 LVS00154555-LVS00154556; LVS00154638-LVS00154644; LVS00155411-LVS00155412;
6 LVS00156079-LVS00156080; LVS00157343-LVS00157345; LVS00157346-LVS00157347;
7 LVS00157348-LVS00157349; LVS00159018-LVS00159019; LVS00159663-LVS00159665;
8 LVS00160011-LVS00160012; LVS00160013; LVS00160017; LVS00160237; LVS00160238;
9 LVS00160239; LVS00160933-LVS00160935; LVS00160936-LVS00160938; LVS00160939-
10 LVS00160942; LVS00160951; LVS00160952-LVS00160955; LVS00176028-LVS00176032;
11 LVS00176036-LVS00176037; LVS00176039-LVS00176040; LVS00176041-LVS00176042;
12 LVS00176060-LVS00176061; LVS00176067-LVS00176068; LVS00176093-LVS00176095;
13 LVS00176096; LVS00176097; LVS00176098-LVS00176099; LVS00176100-LVS00176101;
14 LVS00176102-LVS00176103; LVS00176105-LVS00176106; LVS00176140-LVS00176141;
15 LVS00176142-LVS00176143; LVS00176263-LVS00176264; LVS00194683; LVS00194713;
16 LVS00194715; LVS00194716-LVS00194717; LVS00194718; LVS00194724-LVS00194725;
17 LVS00194726-LVS00194727; LVS00194729-LVS00194730; LVS00194731-LVS00194732;
18 LVS00194733-LVS00194734; LVS00194735-LVS00194736; LVS00194739; LVS00194740-
19 LVS00194741; LVS00194742-LVS00194743; LVS00194744; LVS00194745; LVS00194746;
20 LVS00194747; LVS00194748-LVS00194750; LVS00194751-LVS00194753; LVS00194756;
21 LVS00194757; LVS00194892; LVS00194900-LVS00194901; LVS00194902-LVS00194903;
22 LVS00194904-LVS00194906; LVS00194907-LVS00194909; LVS00194942-LVS00194944;
23 LVS00195223-LVS00195225; LVS00196676; LVS00196679; LVS00196680; LVS00197395;
24 LVS00200996-LVS00200997; LVS00201627; LVS00201628-LVS00201629; LVS00201630;
25 LVS00201631; LVS00201923; LVS00201924-LVS00201925; LVS00201926; LVS00201930;
26 LVS00201986; LVS00201987; LVS00201988-LVS00201989; LVS00202385; LVS00202386;
27 LVS00202469-LVS00202473; LVS00202474-LVS00202476; LVS00203428-LVS00203433;
28 LVS00203434-LVS00203437; LVS00203438-LVS00203439; LVS00203440-LVS00203444;

1 LVS00204991-LVS00204992; LVS00205261-LVS00205263; LVS00205264-LVS00205268;
2 LVS00205269-LVS00205273; LVS00205274-LVS00205276; LVS00205277-LVS00205281;
3 LVS00205898-LVS00205899; LVS00205900-LVS00205902; LVS00205903-LVS00205906;
4 LVS00205907-LVS00205911; LVS00206563-LVS00206567; LVS00206568-LVS00206571;
5 LVS00206572-LVS00206573.

6 **REQUEST FOR PRODUCTION NO. 10:**

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

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

13 LVSC incorporates the Preliminary Statement and each of the General Objections as
14 though fully set forth herein.

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

18 Subject to and without waiver of the foregoing objections (including the Preliminary
19 Statement and General Objections), please refer to the documents produced by LVSC Bates
20 labeled as: LVS00144361; LVS00144362; LVS00144363-LVS00144554; LVS00145982-
21 LVS00145998; LVS00146056-LVS00146071; LVS00156257-LVS00156273; LVS00158989;
22 LVS00158997-LVS00159000; LVS00159015; LVS00159020-LVS00159022; LVS00159183-
23 LVS00159199; LVS00175452; LVS00175453; LVS00176161; LVS00176162; LVS00176452;
24 LVS00182055-LVS00182071; LVS00197349; LVS00201990; LVS00201991; LVS00201992-
25 LVS00202183.

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

27 Please identify and produce all documents, memoranda, emails, and/or other
28 correspondence that reflect services performed by LVSC (including LVSC's executives and/or

1 employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or
2 concerning site design and development oversight of Parcels 5 and 6, during the time period of
3 January 1, 2009, to October 20, 2010.

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

5 LVSC incorporates the Preliminary Statement and each of the General Objections as
6 though fully set forth herein.

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

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 LVSC Bates
12 labeled as: LVS00144160-LVS00144161; LVS00144163-LVS00144232; LVS00144233-
13 LVS00144352; LVS00144607-LVS00144637; LVS00144638-LVS00144773; LVS00144803-
14 LVS00144906; LVS00145110; LVS00145158-LVS00145160; LVS00145169-LVS00145183;
15 LVS00145184-LVS00145193; LVS00145201-LVS00145203; LVS00145204-LVS00145207;
16 LVS00145310-LVS00145313; LVS00145314-LVS00145316; LVS00145321; LVS00145322-
17 LVS00145324; LVS00145373-LVS00145374; LVS00145375-LVS00145376; LVS00145388;
18 LVS00145390-LVS00145391; LVS00145392-LVS00145394; LVS00145395; LVS00145396;
19 LVS00145453; LVS00145454-LVS00145468; LVS00145471-LVS00145472; LVS00145473;
20 LVS00145474-LVS00145475; LVS00145478-LVS00145538; LVS00145539-LVS00145597;
21 LVS00145598-LVS00145626; LVS00145627-LVS00145630; LVS00145639-LVS00145644;
22 LVS00145786-LVS00145804; LVS00145818-LVS00145869; LVS00145874-LVS00145879;
23 LVS00145881-LVS00145886; LVS00145888-LVS00145892; LVS00145898-LVS00145911;
24 LVS00145914; LVS00145917-LVS00145930; LVS00145943-LVS00145948; LVS00145982-
25 LVS00145998; LVS00145999-LVS00146039; LVS00146045-LVS00146047; LVS00146048-
26 LVS00146055; LVS00146056-LVS00146071; LVS00146072-LVS00146096; LVS00146150;
27 LVS00146184-LVS00146188; LVS00146196-LVS00146198; LVS00146211-LVS00146241;
28 LVS00146247; LVS00146257; LVS00146258; LVS00146259-LVS00146260; LVS00146377-

1 LVS00146435; LVS00146951; LVS00146953; LVS00146955; LVS00146975-LVS00146994;
2 LVS00147013-LVS00147014; LVS00147022-LVS00147023; LVS00147024-LVS00147025;
3 LVS00147396-LVS00147409; LVS00147466-LVS00147467; LVS00147912-LVS00148351;
4 LVS00148713-LVS00148726; LVS00148755; LVS00149041-LVS00149042; LVS00149043-
5 LVS00149044; LVS00151498; LVS00153638; LVS00153685-LVS00153686; LVS00154264-
6 LVS00154269; LVS00154448-LVS00154449; LVS00154453-LVS00154456; LVS00155323;
7 LVS00156007-LVS00156010; LVS00157045; LVS00157046-LVS00157047; LVS00157048-
8 LVS00157049; LVS00158555-LVS00158574; LVS00158689; LVS00158690; LVS00158692-
9 LVS00158695; LVS00158696-LVS00158699; LVS00158700-LVS00158702; LVS00158737-
10 LVS00158740; LVS00158741-LVS00158743; LVS00158744; LVS00158890-LVS00158913;
11 LVS00158996; LVS00159013; LVS00159014; LVS00159030-LVS00159031; LVS00159032;
12 LVS00159033; LVS00159034; LVS00159035; LVS00159036; LVS00159037; LVS00159038;
13 LVS00159039; LVS00159040; LVS00159041-LVS00159042; LVS00159043; LVS00159044;
14 LVS00159045; LVS00162427-LVS00162428; LVS00162844-LVS00162845; LVS00163144;
15 LVS00171495; LVS00171496; LVS00171535-LVS00171536; LVS00175455; LVS00175456;
16 LVS00175457; LVS00175684-LVS00175707; LVS00175967-LVS00175968; LVS00175969;
17 LVS00175974-LVS00175975; LVS00175976; LVS00175977; LVS00175978; LVS00175979;
18 LVS00175980-LVS00175981; LVS00175982-LVS00175983; LVS00175984; LVS00175985;
19 LVS00175986; LVS00176158-LVS00176159; LVS00176160; LVS00176165; LVS00176166;
20 LVS00176167; LVS00176851; LVS00177409-LVS00177572; LVS00179447; LVS00179448-
21 LVS00179455; LVS00179459; LVS00179464; LVS00179500; LVS00179501-LVS00179503;
22 LVS00179522-LVS00179533; LVS00180201-LVS00180203; LVS00189937; LVS00189938;
23 LVS00189977-LVS00189978; LVS00192046-LVS00192047; LVS00192346; LVS00193112-
24 LVS00193113; LVS00194761-LVS00194762; LVS00194763-LVS00194765; LVS00194962;
25 LVS00194963; LVS00194964; LVS00194971-LVS00194994; LVS00195009-LVS00195011;
26 LVS00195012-LVS00195014; LVS00195025; LVS00195065; LVS00195066-LVS00195067;
27 LVS00195068; LVS00195069; LVS00195070; LVS00195071; LVS00195074; LVS00195077-
28 LVS00195078; LVS00195079; LVS00195080; LVS00195081; LVS00195082; LVS00195084;

1 LVS00195085; LVS00195086-LVS00195087; LVS00195088; LVS00195089-LVS00195112;
2 LVS00195113; LVS00195114-LVS00195124; LVS00195238-LVS00195239; LVS00195321-
3 LVS00195323; LVS00195324-LVS00195326; LVS00195542-LVS00195543; LVS00195544;
4 LVS00196694-LVS00196695; LVS00196696-LVS00196698; LVS00196850; LVS00196851-
5 LVS00196888; LVS00196889; LVS00196890-LVS00196927; LVS00196928; LVS00196929-
6 LVS00196966; LVS00196968-LVS00196983; LVS00197102; LVS00197103-LVS00197105;
7 LVS00197106-LVS00197107; LVS00197108-LVS00197109; LVS00197118-LVS00197119;
8 LVS00197120-LVS00197121; LVS00197122-LVS00197124; LVS00197125-LVS00197127;
9 LVS00197128-LVS00197130; LVS00197131-LVS00197133; LVS00197134-LVS00197137;
10 LVS00197138-LVS00197140; LVS00197141-LVS00197144; LVS00197145-LVS00197148;
11 LVS00197149-LVS00197152; LVS00197153-LVS00197156; LVS00197157-LVS00197160;
12 LVS00197312-LVS00197316; LVS00197320-LVS00197321; LVS00197322-LVS00197324;
13 LVS00197325-LVS00197328; LVS00199673; LVS00199674-LVS00199697; LVS00199698;
14 LVS00199699-LVS00199709; LVS00200142-LVS00200144; LVS00201015; LVS00201023;
15 LVS00201027-LVS00201028; LVS00201128; LVS00201391; LVS00201392-LVS00201399;
16 LVS00201403; LVS00201404; LVS00201405; LVS00201406; LVS00201407-LVS00201408;
17 LVS00201409; LVS00201412; LVS00201484; LVS00201485-LVS00201486; LVS00201487;
18 LVS00201488-LVS00201490; LVS00201509-LVS00201520; LVS00201606; LVS00202185-
19 LVS00202254; LVS00203999-LVS00204068; LVS00204204; LVS00204234; LVS00205282-
20 LVS00205283; LVS00205547-LVS00205616; LVS00206071-LVS00206073; LVS00206363-
21 LVS00206432; LVS00206561-LVS00206562.

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

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

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

1 LVSC incorporates the Preliminary Statement and each of the General Objections as
2 though fully set forth herein.

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

6 Subject to and without waiver of the foregoing objections (including the Preliminary
7 Statement and General Objections), please refer to the documents produced by LVSC Bates
8 labeled as: LVS00144559; LVS00144560-LVS00144564; LVS00144922; LVS00144924;
9 LVS00145143; LVS00145144; LVS00145659-LVS00145662; LVS00145680-LVS00145681;
10 LVS00145682-LVS00145686; LVS00145687-LVS00145690; LVS00145691-LVS00145692;
11 LVS00146177; LVS00146178-LVS00146181; LVS00153680-LVS00153681; LVS00153768-
12 LVS00153769; LVS00154566-LVS00154569; LVS00176335; LVS00179083-LVS00179084;
13 LVS00197404-LVS00197405; LVS00197406-LVS00197410; LVS00197411-LVS00197414;
14 LVS00197415-LVS00197416; LVS00200937-LVS00200938; LVS00200939-LVS00200954;
15 LVS00200955-LVS00200958; LVS00200959-LVS00200960; LVS00200961-LVS00200962;
16 LVS00200963-LVS00200964; LVS00201929; LVS00202384.

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

18 Please identify and produce all documents, memoranda, emails, and/or other
19 correspondence that reflect services performed by LVSC (including LVSC's executives and/or
20 employees and/or consultants and/or agents) for or on behalf of Sands China, related to and/or
21 concerning marketing of Sands China properties, including its frequency program, the issuance of
22 "Chairman's Club" cards by Sheldon G. Adelson to Cheung Chi Tai, Jack Lam and others, credit
23 limits, floor layouts, the removal of Cheung Chi Tai, Charles Heung Wah Keung, and others from
24 the Guarantor list of VIP promoters, nightclub operations and approval, including but not limited
25 to Lotus Night Club, and/or the hiring of outside consultants, during the time period of January 1,
26 2009, to October 20, 2010.

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

28 LVSC incorporates the Preliminary Statement and each of the General Objections as

1 though fully set forth herein.

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

5 Subject to and without waiver of the foregoing objections (including the Preliminary
6 Statement and General Objections), please refer to the documents produced by LVSC Bates
7 labeled as: LVS00144557; LVS00144558; LVS00144570-LVS00144571; LVS00144572-
8 LVS00144576; LVS00144790-LVS00144792; LVS00144793-LVS00144797; LVS00144908;
9 LVS00144909; LVS00145665-LVS00145679; LVS00148747-LVS00148748; LVS00153694;
10 LVS00154638-LVS00154644; LVS00154813; LVS00155340; LVS00155411-LVS00155412;
11 LVS00156079-LVS00156080; LVS00156164-LVS00156171; LVS00157343-LVS00157345;
12 LVS00157346-LVS00157347; LVS00157348-LVS00157349; LVS00157350; LVS00158726-
13 LVS00158728; LVS00158736; LVS00159016; LVS00159018-LVS00159019; LVS00159663-
14 LVS00159665; LVS00159993; LVS00159994-LVS00159995; LVS00159996; LVS00159997;
15 LVS00159998-LVS00160010; LVS00160011-LVS00160012; LVS00160013; LVS00160014;
16 LVS00160015; LVS00160016; LVS00160017; LVS00160018; LVS00160019-LVS00160021;
17 LVS00160022-LVS00160023; LVS00160024; LVS00160025-LVS00160027; LVS00160028-
18 LVS00160031; LVS00160032-LVS00160034; LVS00160035-LVS00160044; LVS00160045;
19 LVS00160046-LVS00160056; LVS00160057-LVS00160061; LVS00160062-LVS00160066;
20 LVS00160067-LVS00160077; LVS00160078-LVS00160080; LVS00160081-LVS00160085;
21 LVS00160086-LVS00160096; LVS00160097-LVS00160107; LVS00160108-LVS00160115;
22 LVS00160116-LVS00160124; LVS00160125-LVS00160126; LVS00160127; LVS00160128-
23 LVS00160130; LVS00160131-LVS00160133; LVS00160134-LVS00160135; LVS00160136;
24 LVS00160137-LVS00160138; LVS00160139-LVS00160140; LVS00160141; LVS00160142-
25 LVS00160149; LVS00160150-LVS00160156; LVS00160157-LVS00160164; LVS00160165-
26 LVS00160170; LVS00160171-LVS00160174; LVS00160175-LVS00160179; LVS00160180-
27 LVS00160184; LVS00160185-LVS00160187; LVS00160188-LVS00160192; LVS00160193-
28 LVS00160198; LVS00160199-LVS00160200; LVS00160201; LVS00160202-LVS00160216;

1 LVS00160217-LVS00160219; LVS00160220-LVS00160222; LVS00160223-LVS00160226;
2 LVS00160227-LVS00160231; LVS00160232; LVS00160233; LVS00160234; LVS00160235;
3 LVS00160236; LVS00160237; LVS00160238; LVS00160239; LVS00160240-LVS00160242;
4 LVS00160243-LVS00160244; LVS00160245-LVS00160247; LVS00160248-LVS00160250;
5 LVS00160251-LVS00160252; LVS00160253; LVS00160260-LVS00160264; LVS00160265-
6 LVS00160267; LVS00160268-LVS00160269; LVS00160270; LVS00160271; LVS00160272-
7 LVS00160274; LVS00160275-LVS00160276; LVS00160277-LVS00160287; LVS00160288-
8 LVS00160290; LVS00160291; LVS00160292; LVS00160293; LVS00160306; LVS00160307-
9 LVS00160432; LVS00160433-LVS00160436; LVS00160437-LVS00160438; LVS00160439-
10 LVS00160444; LVS00160445-LVS00160448; LVS00160449-LVS00160452; LVS00160453-
11 LVS00160454; LVS00160455-LVS00160595; LVS00160596; LVS00160597-LVS00160600;
12 LVS00160601; LVS00160602-LVS00160763; LVS00160764-LVS00160765; LVS00160766-
13 LVS00160769; LVS00160770-LVS00160779; LVS00160780; LVS00160781-LVS00160785;
14 LVS00160786; LVS00160787-LVS00160791; LVS00160796; LVS00160797-LVS00160801;
15 LVS00160803-LVS00160809; LVS00160856-LVS00160857; LVS00160858-LVS00160861;
16 LVS00160862-LVS00160863; LVS00160864-LVS00160867; LVS00160868; LVS00160869-
17 LVS00160872; LVS00160873; LVS00160874-LVS00160877; LVS00160878-LVS00160880;
18 LVS00160881-LVS00160883; LVS00160884-LVS00160886; LVS00160887-LVS00160889;
19 LVS00160890; LVS00160891; LVS00160892-LVS00160893; LVS00160894-LVS00160895;
20 LVS00160896-LVS00160897; LVS00160898; LVS00160899-LVS00160903; LVS00160904-
21 LVS00160906; LVS00160907-LVS00160909; LVS00160910; LVS00160911-LVS00160914;
22 LVS00160915-LVS00160916; LVS00160917; LVS00160918; LVS00160919-LVS00160923;
23 LVS00160925; LVS00160926; LVS00160927; LVS00160928-LVS00160932; LVS00160933-
24 LVS00160935; LVS00160936-LVS00160938; LVS00160939-LVS00160942; LVS00160943;
25 LVS00160944-LVS00160950; LVS00160951; LVS00160952-LVS00160955; LVS00163208-
26 LVS00163237; LVS00175451; LVS00176027; LVS00176028-LVS00176032; LVS00176036-
27 LVS00176037; LVS00176038; LVS00176039-LVS00176040; LVS00176041-LVS00176042;
28 LVS00176060-LVS00176061; LVS00176062-LVS00176066; LVS00176067-LVS00176068;

1 LVS00176093-LVS00176095; LVS00176096; LVS00176097; LVS00176098-LVS00176099;
2 LVS00176100-LVS00176101; LVS00176102-LVS00176103; LVS00176104; LVS00176105-
3 LVS00176106; LVS00176107-LVS00176111; LVS00176140-LVS00176141; LVS00176142-
4 LVS00176143; LVS00176144-LVS00176148; LVS00176263-LVS00176264; LVS00176265;
5 LVS00176416-LVS00176451; LVS00176453; LVS00176462-LVS00176464; LVS00179484-
6 LVS00179499; LVS00180077; LVS00180078; LVS00180079-LVS00180080; LVS00180081;
7 LVS00180082-LVS00180094; LVS00192410-LVS00192439; LVS00194683; LVS00194712;
8 LVS00194713; LVS00194714; LVS00194715; LVS00194716-LVS00194717; LVS00194718;
9 LVS00194719-LVS00194723; LVS00194724-LVS00194725; LVS00194726-LVS00194727;
10 LVS00194728; LVS00194729-LVS00194730; LVS00194731-LVS00194732; LVS00194733-
11 LVS00194734; LVS00194735-LVS00194736; LVS00194737-LVS00194738; LVS00194739;
12 LVS00194740-LVS00194741; LVS00194742-LVS00194743; LVS00194744; LVS00194745;
13 LVS00194746; LVS00194747; LVS00194748-LVS00194750; LVS00194751-LVS00194753;
14 LVS00194754-LVS00194755; LVS00194756; LVS00194757; LVS00194892; LVS00194893;
15 LVS00194894-LVS00194899; LVS00194900-LVS00194901; LVS00194902-LVS00194903;
16 LVS00194904-LVS00194906; LVS00194907-LVS00194909; LVS00194910-LVS00194912;
17 LVS00194924-LVS00194926; LVS00194942-LVS00194944; LVS00195223-LVS00195225;
18 LVS00195226-LVS00195227; LVS00195228-LVS00195230; LVS00195236-LVS00195237;
19 LVS00195273-LVS00195276; LVS00196676; LVS00196679; LVS00196680; LVS00196833-
20 LVS00196834; LVS00197395; LVS00197418-LVS00197432; LVS00200173; LVS00200996-
21 LVS00200997; LVS00201441-LVS00201456; LVS00201627; LVS00201628-LVS00201629;
22 LVS00201630; LVS00201631; LVS00201910; LVS00201923; LVS00201924-LVS00201925;
23 LVS00201926; LVS00201930; LVS00201986; LVS00201987; LVS00201988-LVS00201989;
24 LVS00202385; LVS00202386; LVS00202468; LVS00202469-LVS00202473; LVS00202474-
25 LVS00202476; LVS00202480; LVS00202481-LVS00202612; LVS00202613-LVS00202616;
26 LVS00202617-LVS00202618; LVS00202629-LVS00202632; LVS00202633-LVS00202634;
27 LVS00202635-LVS00202778; LVS00202779-LVS00202780; LVS00202781-LVS00202784;
28 LVS00202797; LVS00202798-LVS00202801; LVS00202802; LVS00202803-LVS00202806;

1 LVS00202807; LVS00202808-LVS00202812; LVS00202813; LVS00202814-LVS00202817;
2 LVS00202818; LVS00202819-LVS00202822; LVS00202823; LVS00202824-LVS00202828;
3 LVS00202875; LVS00202876-LVS00203046; LVS00203047-LVS00203048; LVS00203049-
4 LVS00203052; LVS00203062; LVS00203063-LVS00203067; LVS00203068; LVS00203069-
5 LVS00203072; LVS00203073; LVS00203074-LVS00203078; LVS00203079; LVS00203080-
6 LVS00203084; LVS00203128-LVS00203129; LVS00203130-LVS00203132; LVS00203133;
7 LVS00203134-LVS00203135; LVS00203136-LVS00203137; LVS00203138-LVS00203140;
8 LVS00203141; LVS00203143-LVS00203145; LVS00203146-LVS00203148; LVS00203149-
9 LVS00203151; LVS00203152; LVS00203153; LVS00203428-LVS00203433; LVS00203434-
10 LVS00203437; LVS00203438-LVS00203439; LVS00203440-LVS00203444; LVS00204991-
11 LVS00204992; LVS00205261-LVS00205263; LVS00205264-LVS00205268; LVS00205269-
12 LVS00205273; LVS00205274-LVS00205276; LVS00205277-LVS00205281; LVS00205898-
13 LVS00205899; LVS00205900-LVS00205902; LVS00205903-LVS00205906; LVS00205907-
14 LVS00205911; LVS00206563-LVS00206567; LVS00206568-LVS00206571; LVS00206572-
15 LVS00206573.

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

17 Please identify and produce all documents, memoranda, emails, and/or other
18 correspondence that reflect services performed by LVSC or the involvement of LVSC executives
19 (including LVSC's executives and/or employees and/or consultants and/or agents) for or on
20 behalf of Sands China, related to and/or concerning negotiation of a possible joint venture
21 between Sands China and Harrah's, during the time period of January 1, 2009, to October 20,
22 2010 if such documents exist.

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

24 LVSC incorporates the Preliminary Statement and each of the General Objections as
25 though fully set forth herein.

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

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 LVSC Bates
3 labeled as: LVS00175970; LVS00195541.

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

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

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

9 LVSC incorporates the Preliminary Statement and each of the General Objections as
10 though fully set forth herein.

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

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 LVSC Bates
16 labeled as: LVS00145645; LVS00197101; LVS00201933; LVS00201934-LVS00201947.

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

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

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

22 LVSC incorporates the Preliminary Statement and each of the General Objections as
23 though fully set forth herein.

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

27 Subject to and without waiver of the foregoing objections (including the Preliminary
28 Statement and General Objections), please refer to the documents produced by LVSC Bates

1 labeled as: LVS00145806-LVS00145815; LVS00146313; LVS00146996-LVS00146998;
2 LVS00150039; LVS00151460-LVS00151462; LVS00153173-LVS00153176; LVS00154469;
3 LVS00175657-LVS00175658; LVS00175659-LVS00175660; LVS00175662-LVS00175663;
4 LVS00179205; LVS00194841; LVS00194843-LVS00194844; LVS00194845-LVS00194846;
5 LVS00201074.

6 **REQUEST FOR PRODUCTION NO. 18:**

7 Please identify and produce all documents that reflect communications by and between
8 Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's
9 behalf) and Bally Technologies, Inc., during the time period of January 1, 2009 to October 20,
10 2010.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

12 LVSC incorporates the Preliminary Statement and each of the General Objections as
13 though fully set forth herein.

14 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
18 Statement and General Objections), please refer to the documents produced by LVSC Bates
19 labeled as: LVS00158707; LVS00158709; LVS00159023; LVS00159024.

20 **REQUEST FOR PRODUCTION NO. 20:**

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

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

26 LVSC incorporates the Preliminary Statement and each of the General Objections as
27 though fully set forth herein.

28 LVSC objects to this request as overbroad and unduly burdensome insofar as it seeks "all

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

6 Subject to and without waiver of the foregoing objections (including the Preliminary
7 Statement and General Objections), please refer to the documents produced by LVSC Bates
8 labeled as: LVS00156601-LVS00156610; LVS00157441-LVS00157443; LVS00157444-
9 LVS00157449; LVS00157450-LVS00157457; LVS00157458-LVS00157460; LVS00157461-
10 LVS00157463; LVS00157464-LVS00157466; LVS00157467-LVS00157473; LVS00157474-
11 LVS00157476; LVS00157497; LVS00157498; LVS00157499-LVS00157502; LVS00157503-
12 LVS00157512; LVS00157535-LVS00157536; LVS00157537-LVS00157538; LVS00157539-
13 LVS00157550; LVS00157551-LVS00157556; LVS00157557-LVS00157561; LVS00157562-
14 LVS00157569; LVS00157570-LVS00157580; LVS00157581-LVS00157585; LVS00157586-
15 LVS00157589; LVS00157590-LVS00157594; LVS00157595-LVS00157604; LVS00157605-
16 LVS00157608; LVS00157740-LVS00157749; LVS00157807-LVS00157808; LVS00157809-
17 LVS00157814; LVS00157815-LVS00157825; LVS00157838-LVS00157857; LVS00157858-
18 LVS00157865; LVS00157866-LVS00157888; LVS00157889-LVS00157899; LVS00157985-
19 LVS00157988; LVS00157989-LVS00158000; LVS00162236; LVS00162250-LVS00162252;
20 LVS00162328-LVS00162329; LVS00162389-LVS00162400; LVS00162401-LVS00162403;
21 LVS00162414-LVS00162416; LVS00162417-LVS00162422; LVS00162423-LVS00162426;
22 LVS00162429-LVS00162448; LVS00162456-LVS00162459; LVS00162574-LVS00162576;
23 LVS00162577-LVS00162578; LVS00162579; LVS00162580-LVS00162581; LVS00162582-
24 LVS00162583; LVS00162584-LVS00162585; LVS00162597-LVS00162599; LVS00162600-
25 LVS00162601; LVS00162626-LVS00162637; LVS00162846-LVS00162850; LVS00162851-
26 LVS00162860; LVS00162861-LVS00162864; LVS00162865-LVS00162870; LVS00162871-
27 LVS00162878; LVS00162879-LVS00162881; LVS00162882-LVS00162884; LVS00162885-
28 LVS00162891; LVS00162892-LVS00162894; LVS00162942-LVS00162943; LVS00162944-

1 LVS00162949; LVS00162950-LVS00162969; LVS00162970-LVS00162979; LVS00163020-
2 LVS00163023; LVS00163024-LVS00163034; LVS00163035-LVS00163040; LVS00163041-
3 LVS00163045; LVS00163046-LVS00163047; LVS00163157-LVS00163159; LVS00163167;
4 LVS00163168-LVS00163169; LVS00163377-LVS00163409; LVS00166006-LVS00166031;
5 LVS00166048-LVS00166073; LVS00171176-LVS00171185; LVS00171243-LVS00171244;
6 LVS00171245-LVS00171250; LVS00171251-LVS00171261; LVS00171274-LVS00171293;
7 LVS00171294-LVS00171301; LVS00171302-LVS00171324; LVS00171325-LVS00171335;
8 LVS00171421-LVS00171424; LVS00171425-LVS00171436; LVS00171439-LVS00171441;
9 LVS00171442-LVS00171447; LVS00171448-LVS00171455; LVS00171456-LVS00171458;
10 LVS00171459-LVS00171461; LVS00171462-LVS00171464; LVS00171465-LVS00171471;
11 LVS00171472-LVS00171474; LVS00171497-LVS00171500; LVS00171501-LVS00171510;
12 LVS00171533-LVS00171534; LVS00171537-LVS00171548; LVS00171549-LVS00171554;
13 LVS00171555-LVS00171559; LVS00171560-LVS00171567; LVS00171568-LVS00171578;
14 LVS00171579-LVS00171583; LVS00171584-LVS00171587; LVS00171588-LVS00171592;
15 LVS00171593-LVS00171602; LVS00171603-LVS00171606; LVS00171758-LVS00171843;
16 LVS00171847-LVS00171852; LVS00175851; LVS00179873-LVS00179875; LVS00179876-
17 LVS00179887; LVS00189325-LVS00189330; LVS00189405-LVS00189490; LVS00189617-
18 LVS00189626; LVS00189684-LVS00189685; LVS00189686-LVS00189691; LVS00189692-
19 LVS00189702; LVS00189715-LVS00189734; LVS00189735-LVS00189742; LVS00189743-
20 LVS00189765; LVS00189766-LVS00189776; LVS00189862-LVS00189865; LVS00189866-
21 LVS00189877; LVS00189881-LVS00189883; LVS00189884-LVS00189889; LVS00189890-
22 LVS00189897; LVS00189898-LVS00189900; LVS00189901-LVS00189903; LVS00189904-
23 LVS00189906; LVS00189907-LVS00189913; LVS00189914-LVS00189916; LVS00189939-
24 LVS00189942; LVS00189943-LVS00189952; LVS00189975-LVS00189976; LVS00189979-
25 LVS00189990; LVS00189991-LVS00189996; LVS00189997-LVS00190001; LVS00190002-
26 LVS00190009; LVS00190010-LVS00190020; LVS00190021-LVS00190025; LVS00190026-
27 LVS00190029; LVS00190030-LVS00190034; LVS00190035-LVS00190044; LVS00190045-
28 LVS00190048; LVS00192048-LVS00192052; LVS00192053-LVS00192062; LVS00192063-

LVS00192066; LVS00192067-LVS00192072; LVS00192073-LVS00192080; LVS00192081-
LVS00192083; LVS00192084-LVS00192086; LVS00192087-LVS00192093; LVS00192094-
LVS00192096; LVS00192144-LVS00192145; LVS00192146-LVS00192151; LVS00192152-
LVS00192171; LVS00192172-LVS00192181; LVS00192222-LVS00192225; LVS00192226-
LVS00192236; LVS00192237-LVS00192242; LVS00192243-LVS00192247; LVS00192248-
LVS00192249; LVS00192359-LVS00192361; LVS00192369; LVS00192370-LVS00192371;
LVS00192579-LVS00192611; LVS00193014-LVS00193015; LVS00193075-LVS00193085;
LVS00193086-LVS00193088; LVS00193099-LVS00193101; LVS00193102-LVS00193107;
LVS00193108-LVS00193111; LVS00193114-LVS00193133; LVS00193141-LVS00193144;
LVS00193259-LVS00193261; LVS00193262-LVS00193263; LVS00193264; LVS00193265-
LVS00193266; LVS00193267-LVS00193268; LVS00193269-LVS00193270; LVS00193282-
LVS00193284; LVS00193285-LVS00193286; LVS00193311-LVS00193322; LVS00193730;
LVS00193744-LVS00193746; LVS00194175-LVS00194235; LVS00195324-LVS00195326;
LVS00195331; LVS00195377; LVS00195378; LVS00195599-LVS00195624; LVS00199175-
LVS00199200; LVS00201576-LVS00201587.

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:

LVSC incorporates the Preliminary Statement and each of the General Objections as
though fully set forth herein.

LVSC 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.

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

1 labeled as: LVS00145454-LVS00145468; LVS00145473; LVS00146258; LVS00158744;
2 LVS00159006-LVS00159007; LVS00159008-LVS00159009; LVS00159010; LVS00159011-
3 LVS00159012; LVS00159025; LVS00159026-LVS00159027; LVS00159028-LVS00159029;
4 LVS00161176-LVS00161294; LVS00161478-LVS00161538; LVS00162449-LVS00162455;
5 LVS00162814-LVS00162820; LVS00179447; LVS00179448-LVS00179455; LVS00179500;
6 LVS00179501-LVS00179503; LVS00192016-LVS00192022; LVS00193134-LVS00193140;
7 LVS00196851-LVS00196888; LVS00196890-LVS00196927; LVS00196929-LVS00196966;
8 LVS00198314-LVS00198315; LVS00201015; LVS00201016-LVS00201017; LVS00201023;
9 LVS00201024-LVS00201026; LVS00201027-LVS00201028; LVS00201128; LVS00201129-
10 LVS00201131; LVS00201391; LVS00201392-LVS00201399; LVS00201407-LVS00201408;
11 LVS00201484; LVS00201485-LVS00201486; LVS00201487; LVS00201488-LVS00201490;
12 LVS00201606; LVS00201607-LVS00201610.

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

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

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

27 LVSC incorporates the Preliminary Statement and each of the General Objections as
28 though fully set forth herein.

1 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
5 Statement and General Objections), please refer to the documents produced by LVSC Bates
6 labeled as: LVS00145208; LVS00151490; LVS00154815; LVS00158691; LVS00158703;
7 LVS00158704-LVS00158705; LVS00158707; LVS00158709; LVS00158710; LVS00158711;
8 LVS00158712; LVS00158744; LVS00158988; LVS00159003; LVS00159004; LVS00159005;
9 LVS00159006-LVS00159007; LVS00159008-LVS00159009; LVS00159010; LVS00159011-
10 LVS00159012; LVS00159024; LVS00159025; LVS00159026-LVS00159027; LVS00159028-
11 LVS00159029; LVS00163753-LVS00163754; LVS00176076-LVS00176078; LVS00176857;
12 LVS00176904; LVS00191862; LVS00191863; LVS00198395; LVS00200140-LVS00200141;
13 LVS00201907; LVS00201908; LVS00201909.

14 DATED September 17, 2012.

15 
16 J. Stephen Peek, Esq.
17 Robert J. Cassity, Esq.,
18 Holland & Hart LLP
19 9555 Hillwood Drive, 2nd Floor
20 Las Vegas, Nevada 89134

21 *Attorneys for Las Vegas Sands Corp. and Sands*
22 *China Ltd.*

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

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b), I certify that on September 17, 2012, I served a true and correct copy of the foregoing **LAS VEGAS SANDS CORP.'S SEVENTH SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-24)** by depositing same in the United States mail, first class postage fully prepaid to the persons and addresses listed below:

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13 *Attorneys for Las Vegas Sands Corp.*
14 *and 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
21 Islands corporation; SHELDON G. ADELSON,
in his individual and representative capacity;
22 DOES I-X; and ROE CORPORATIONS I-X,

23 Defendants.

24 LAS VEGAS SANDS CORP., a Nevada
25 corporation,

26 Counterclaimant,

27 v.

28 STEVEN C. JACOBS,

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

Date: n/a
Time: n/a

**LAS VEGAS SANDS CORP.'S EIGHTH
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS
(Nos. 1-24)**

Counterdefendant.

TO: STEVEN C. JACOBS, plaintiff

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

Defendant Las Vegas Sands Corp. ("LVSC") hereby responds and objects to Plaintiff Steven C. Jacobs' ("Plaintiff") First Request For Production Of Documents to Las Vegas Sands Corp. ("Requests") as follows:

PRELIMINARY STATEMENT

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

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

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

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

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

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

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

3 **GENERAL OBJECTIONS**

4 1. LVSC objects to the Requests, including the definitions and instructions therein, to
5 the extent that they purport to impose obligations upon LVSC greater than those authorized and
6 imposed by the Nevada Rules of Civil Procedure, including but not limited to Rule 26(b) therein.

7 2. LVSC objects to the Requests to the extent that they seek the identification and/or
8 production of documents not in its possession, custody or control.

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

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

15 5. LVSC objects to the terms "You and/or Yours" as defined in the Requests, on the
16 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
17 without limitation, the inclusion of "any other affiliated entities, as well as owners, shareholders,
18 officers, employees, attorneys, accountants, agents, investigators, and/or anyone else acting on its
19 behalf and/or its direction and instruction."

20 6. LVSC objects to the term "Sands China" as defined in the Requests, on the
21 grounds that it is vague, ambiguous, overbroad, and unintelligible as worded, including without
22 limitation, the inclusion of "any of [SCL's] pre-incorporation, pre-spin-off, pre-IPO entities" and
23 "and/or anyone else acting on its own behalf and/or its direction and instruction" within the
24 definition. LVSC will construe the term "Sands China" or "SCL" to mean LVSC's subsidiary,
25 Sands China Limited.

26 7. LVSC objects to the terms "Parcels 5 and 6" as defined for the Requests, on the
27 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
28 without limitation, the inclusion of "parcels of property owned by Sands China located on the

1 Cotai Strip" within the definition.

2 8. LVSC objects to all the Requests to the extent that they assume a disputed legal
3 conclusion, namely, that LVSC and/or its employees acted as agents for SCL in conducting
4 business activities in Nevada. LVSC disputes that it or its employees acted as SCL's agent in
5 Nevada. To the extent that it produces documents in response to these Requests, LVSC does not
6 thereby admit that any agency relationship exists between LVSC and SCL.

7 9. LVSC objects to the extent that the Requests call for the disclosure of confidential,
8 personal, or proprietary business information, including without limitation, (i) confidential
9 information protected by contractual confidentiality obligations, (ii) confidential information
10 protected by rights of privacy held by SCL and/or other third parties, and (iii) personal
11 information protected from disclosure under Macau law. Such confidential, personal, or
12 proprietary business information will be produced pursuant to a protective order to be entered
13 among the parties and/or ordered by the Court.

14 10. LVSC further objects that the Requests are unduly burdensome and oppressive to
15 the extent that LVSC is asked to identify each produced document responsive to each Request, as
16 such comprehensive listing is impractical under the circumstances. Rather LVSC only undertakes
17 reasonable efforts to provide such identifications, rather than comprehensive identifications with
18 respect to every produced document.

19 11. By responding to these Requests, LVSC does not in any way waive any rights or
20 objections, including but not limited to LVSC's objections to participation in this jurisdictional
21 discovery notwithstanding the Nevada Supreme Court's August 26, 2011 Writ of Mandamus and
22 stay of this litigation until the adjudication of the issue of whether the District Court holds
23 personal jurisdiction as to SCL.

24 Without waiving these General Objections, LVSC responds to the Requests as follows:

25 **RESPONSES**

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

27 Please identify and produce all documents that reflect the date, time, and location of each
28 Sands China Board meeting (including the meeting held on April 14, 2010, at 9:00 a.m. Macau

1 Time/April 13, 2010, at 6:00 p.m. Las Vegas time), the location of each Board member who
2 participated in each and every meeting, and the manner/method by which each Board member
3 participated in each and every meeting, during the period of January 1, 2009, to October 20, 2010.

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

5 LVSC incorporates the Preliminary Statement and each of the General Objections as
6 though fully set forth herein.

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

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 LVSC Bates
12 labeled as: LVS00206977 – LVS00206978; LVS00206979; LVS00206980; LVS00207089;
13 LVS00207090 – LVS00207093; LVS00207094 – LVS00207097; LVS00207161 –
14 LVS00207165; LVS00207280; LVS00207281; LVS00207359 – LVS00207362; LVS00207363 –
15 LVS00207365; LVS00207431 – LVS00207433; LVS00207495 – LVS00207506; LVS00207515
16 – LVS00207531; LVS00207553 – LVS00207567; LVS00207578 – LVS00207594;
17 LVS00207610 – LVS00207612; LVS00207614 – LVS00207615; LVS00207661 –
18 LVS00207662; LVS00207673 – LVS00207674; LVS00208154 – LVS00208155; LVS00208158;
19 LVS00208159; LVS00208189 – LVS00208202; LVS00208318 – LVS00208318; LVS00208339
20 – LVS00208340; LVS00208346 – LVS00208349; LVS00208356 – LVS00208357;
21 LVS00208358; LVS00208379 – LVS00208380; LVS00208386 – LVS00208389; LVS00208492;
22 LVS00208493 – LVS00208508; LVS00208519 – LVS00208532; LVS00208552; LVS00208553
23 – LVS00208599; LVS00208614 – LVS00208615; LVS00208679; LVS00208701 –
24 LVS00208702; LVS00208703 – LVS00208727; LVS00208809 – LVS00208810; LVS00208896
25 – LVS00208898; LVS00208904 – LVS00208905; LVS00209023; LVS00209024;
26 LVS00209028; LVS00209029; LVS00209030; LVS00209034 – LVS00209036; LVS00209076 –
27 LVS00209077; LVS00209086; LVS00209087 – LVS00209089; LVS00209091 – LVS00209093;
28 LVS00209096 – LVS00209097; LVS00209098; LVS00209108 – LVS00209109; LVS00209118

1 – LVS00209119; LVS00209130; LVS00209299 – LVS00209301; LVS00209319 –
2 LVS00209321; LVS00209322 – LVS00209323; LVS00209340 – LVS00209341; LVS00209348
3 – LVS00209349; LVS00209350 – LVS00209352; LVS00209353 – LVS00209354;
4 LVS00209436; LVS00209953 – LVS00209966; LVS00210027 – LVS00210040; LVS00210053
5 – LVS00210056; LVS00210060 – LVS00210063; LVS00210128 – LVS00210141;
6 LVS00210641 – LVS00210642; LVS00210834 – LVS00210835; LVS00210918 –
7 LVS00210924; LVS00211157; LVS00211266 – LVS00211267; LVS00211268 – LVS00211269;
8 LVS00211302 – LVS00211321; LVS00211336 – LVS00211355; LVS00211607 –
9 LVS00211608; LVS00211609 – LVS00211610; LVS00211611 – LVS00211612; LVS00211613;
10 LVS00211685 – LVS00211686; LVS00211740 – LVS00211742; LVS00211852 –
11 LVS00211857; LVS00212238 – LVS00212242; LVS00212243 – LVS00212246; LVS00212247
12 – LVS00212252; LVS00212253 – LVS00212257; LVS00212260 – LVS00212264;
13 LVS00212268 – LVS00212271; LVS00212272 – LVS00212275; LVS00213118 –
14 LVS00213119; LVS00213970 – LVS00213971; LVS00213972; LVS00213976 – LVS00213978;
15 LVS00214180; LVS00214201; LVS00214202 – LVS00214205; LVS00214206 – LVS00214209;
16 LVS00214365; LVS00214410; LVS00214480 – LVS00214484; LVS00214485 – LVS00214489;
17 LVS00214490 – LVS00214493; LVS00214552; LVS00214567 – LVS00214590; LVS00214695
18 – LVS00214698; LVS00214731 – LVS00214736; LVS00214774; LVS00214788 –
19 LVS00214791; LVS00214792 – LVS00214794; LVS00214795 – LVS00214797; LVS00214798
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21 LVS00214858; LVS00215063 – LVS00215064; LVS00215108 – LVS00215109; LVS00215110
22 – LVS00215112; LVS00215119 – LVS00215120; LVS00215121 – LVS00215123;
23 LVS00215148 – LVS00215149; LVS00215295 – LVS00215296; LVS00215297 –
24 LVS00215298; LVS00215299; LVS00215302 – LVS00215303; LVS00215481 – LVS00215484;
25 LVS00215753 – LVS00215755; LVS00215785; LVS00215864 – LVS00215865; LVS00215969
26 – LVS00215972; LVS00215973 – LVS00215977; LVS00215978 – LVS00215981;
27 LVS00215983 – LVS00215987; LVS00215991 – LVS00215994; LVS00215995 –
28 LVS00215998; LVS00215999 – LVS00216002; LVS00216003 – LVS00216005; LVS00216006

1 - LVS00216008; LVS00216415 - LVS00216416; LVS00216643 - LVS00216646;
2 LVS00216719; LVS00216720; LVS00216721 - LVS00216722; LVS00216734 - LVS00216736;
3 LVS00216773 - LVS00216775; LVS00216776 - LVS00216778; LVS00216837; LVS00216838
4 - LVS00216861; LVS00216868 - LVS00216869; LVS00216870; LVS00216871 -
5 LVS00216882; LVS00216888 - LVS00216899; LVS00216901; LVS00216902 - LVS00216913;
6 LVS00216919 - LVS00216930; LVS00216931; LVS00216932 - LVS00216954; LVS00216960
7 - LVS00216963; LVS00216964; LVS00216974 - LVS00216975; LVS00216976 -
8 LVS00216977; LVS00216978; LVS00216990 - LVS00216991; LVS00216992 - LVS00217015;
9 LVS00217027 - LVS00217028; LVS00217029 - LVS00217051; LVS00217062 -
10 LVS00217063; LVS00217064 - LVS00217075; LVS00217082 - LVS00217092; LVS00217107
11 - LVS00217108; LVS00217175 - LVS00217176; LVS00217177 - LVS00217178;
12 LVS00217179 - LVS00217181; LVS00217185; LVS00217186 - LVS00217188; LVS00217191
13 - LVS00217197; LVS00217198 - LVS00217199; LVS00217200 - LVS00217202;
14 LVS00217203 - LVS00217206; LVS00217207 - LVS00217211; LVS00217212 -
15 LVS00217216; LVS00217345 - LVS00217349; LVS00217351 - LVS00217383; LVS00217384
16 - LVS00217388; LVS00217400 - LVS00217402; LVS00217504 - LVS00217527;
17 LVS00217556; LVS00217557 - LVS00217562; LVS00217673; LVS00217674 - LVS00217679;
18 LVS00217760 - LVS00217762; LVS00218288; LVS00218289 - LVS00218294; LVS00218307
19 - LVS00218309; LVS00218496; LVS00218526 - LVS00218528; LVS00218537 -
20 LVS00218542; LVS00218546 - LVS00218550; LVS00218551 - LVS00218555; LVS00218562
21 - LVS00218565; LVS00218566 - LVS00218568; LVS00218569 - LVS00218571;
22 LVS00218575 - LVS00218577; LVS00218578 - LVS00218579; LVS00218580; LVS00218581;
23 LVS00218741; LVS00218742 - LVS00218746; LVS00218747 - LVS00218749; LVS00218753
24 - LVS00218755; LVS00219029 - LVS00219041; LVS00219054; LVS00219055 -
25 LVS00219056; LVS00219057 - LVS00219061; LVS00219065 - LVS00219067; LVS00219236
26 - LVS00219237; LVS00219333 - LVS00219335; LVS00219337 - LVS00219339;
27 LVS00219345; LVS00219346 - LVS00219351; LVS00219352; LVS00219353 - LVS00219358;
28 LVS00219369 - LVS00219370; LVS00219548 - LVS00219550; LVS00219557 -

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3 LVS00219575 – LVS00219576; LVS00219577; LVS00219578; LVS00219608 – LVS00219610;
4 LVS00219611 – LVS00219613; LVS00219615 – LVS00219616; LVS00219617 –
5 LVS00219618; LVS00219619; LVS00219620; LVS00219628 – LVS00219631; LVS00219639 –
6 LVS00219642; LVS00219650 – LVS00219653; LVS00219661 – LVS00219664; LVS00219672
7 – LVS00219675; LVS00219683 – LVS00219686; LVS00219699; LVS00219775 –
8 LVS00219780; LVS00219784 – LVS00219788; LVS00219789 – LVS00219793; LVS00219797
9 – LVS00219800; LVS00219804 – LVS00219806; LVS00219807 – LVS00219808;
10 LVS00219809; LVS00219810; LVS00219814 – LVS00219816; LVS00219892; LVS00219893 –
11 LVS00219898; LVS00220062; LVS00220063 – LVS00220068; LVS00220069; LVS00220070 –
12 LVS00220074; LVS00220084; LVS00220085 – LVS00220090; LVS00220104 – LVS00220106;
13 LVS00220166 – LVS00220167; LVS00220168 – LVS00220169; LVS00220170 –
14 LVS00220181; LVS00220188 – LVS00220198; LVS00220205 – LVS00220206; LVS00220207;
15 LVS00220208 – LVS00220219; LVS00220225 – LVS00220236; LVS00220238 –
16 LVS00220241; LVS00220242; LVS00220253 – LVS00220276; LVS00220277; LVS00220300 –
17 LVS00220304; LVS00220305 – LVS00220309; LVS00220310 – LVS00220313; LVS00220327;
18 LVS00220345; LVS00220346 – LVS00220349; LVS00220350 – LVS00220353; LVS00220360;
19 LVS00220386 – LVS00220388; LVS00220389 – LVS00220390; LVS00220391; LVS00220395
20 – LVS00220396; LVS00220397; LVS00220398; LVS00220410; LVS00220411 –
21 LVS00220412; LVS00220413 – LVS00220417; LVS00220418 – LVS00220420; LVS00220484;
22 LVS00220485 – LVS00220488; LVS00220489 – LVS00220492; LVS00220507 –
23 LVS00220511; LVS00220614 – LVS00220616; LVS00220643 – LVS00220644; LVS00220653
24 – LVS00220654; LVS00220722 – LVS00220723; LVS00220724; LVS00220725; LVS00220771
25 – LVS00220772; LVS00220800; LVS00220874 – LVS00220876; LVS00220882 –
26 LVS00220883; LVS00220898; LVS00220899; LVS00220900; LVS00220901; LVS00220902;
27 LVS00220904 – LVS00220906; LVS00220907 – LVS00220909; LVS00220910 –
28 LVS00220911; LVS00220912; LVS00220926 – LVS00220928; LVS00220929 – LVS00220930;

1 LVS00220991 – LVS00220994; LVS00220995 – LVS00220998; LVS00221161 –
2 LVS00221162; LVS00221178 – LVS00221179; LVS00221180 – LVS00221181; LVS00221699
3 – LVS00221701; LVS00221713 – LVS00221715; LVS00221716 – LVS00221718;
4 LVS00221740 – LVS00221744; LVS00221745 – LVS00221748; LVS00221774 –
5 LVS00221775; LVS00221829 – LVS00221830; LVS00221896 – LVS00221897; LVS00221899
6 – LVS00221901; LVS00221902 – LVS00221904; LVS00221930 – LVS00221931;
7 LVS00221951 – LVS00221954; LVS00222227; LVS00222234; LVS00222236; LVS00222240 –
8 LVS00222241; LVS00222242; LVS00222346 – LVS00222350; LVS00222453 – LVS00222476;
9 LVS00222477 – LVS00222491; LVS00223001 – LVS00223004; LVS00223056 –
10 LVS00223070; LVS00224027 – LVS00224031; LVS00224032 – LVS00224035; LVS00224166
11 – LVS00224189; LVS00224190 – LVS00224204; LVS00225233 – LVS00225234;
12 LVS00225792 – LVS00225797; LVS00226225 – LVS00226226; LVS00226227; LVS00226248
13 – LVS00226249; LVS00226255 – LVS00226258; LVS00226259; LVS00226260 –
14 LVS00226261; LVS00226544 – LVS00226545; LVS00226546; LVS00226567 – LVS00226568;
15 LVS00226574 – LVS00226577; LVS00227744 – LVS00227758; LVS00228582; LVS00229082
16 – LVS00229083; LVS00229084; LVS00229085 – LVS00229104; LVS00229105 –
17 LVS00229106; LVS00229107 – LVS00229111; LVS00229112 – LVS00229115; LVS00230877
18 – LVS00230881.

19 **REQUEST FOR PRODUCTION NO. 5:**

20 To the extent not produced in response to the preceding requests, please identify and
21 produce all documents that reflect the travels to and from Macau/China/Hong Kong by any LVSC
22 executive and/or employee for work performed on behalf of or directly for Sands China
23 (including, but not limited to, flight logs, travel itineraries) during the time period of January 1,
24 2009, to October 20, 2010.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

26 LVSC incorporates the Preliminary Statement and each of the General Objections as
27 though fully set forth herein.

28 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
5 labeled as: LVS00211842 - LVS00211844; LVS00211845 - LVS00211846; LVS00211847 -
6 LVS00211848; LVS00211851; LVS00218476 - LVS00218477; LVS00219853 - LVS00219854.

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

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

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

13 LVSC incorporates the Preliminary Statement and each of the General Objections as
14 though fully set forth herein.

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

18 Subject to and without waiver of the foregoing objections (including the Preliminary
19 Statement and General Objections), please refer to the documents produced by LVSC Bates
20 labeled as: LVS00206581 - LVS00206626; LVS00206627 - LVS00206660; LVS00206661 -
21 LVS00206693; LVS00206694 - LVS00206726; LVS00206727 - LVS00206735; LVS00206752 -
22 LVS00206753; LVS00206889; LVS00206897; LVS00206902; LVS00206909; LVS00206910 -
23 LVS00206911; LVS00206915 - LVS00206916; LVS00206950 - LVS00206952; LVS00206963 -
24 LVS00206965; LVS00206977 - LVS00206978; LVS00207026; LVS00207049; LVS00207065 -
25 LVS00207067; LVS00207068 - LVS00207069; LVS00207070 - LVS00207071; LVS00207072 -
26 LVS00207073; LVS00207074 - LVS00207077; LVS00207078 - LVS00207080; LVS00207081 -
27 LVS00207082; LVS00207085; LVS00207086; LVS00207087 - LVS00207088; LVS00207090 -
28 LVS00207093; LVS00207094 - LVS00207097; LVS00207101 - LVS00207103; LVS00207104 -

1 LVS00207105; LVS00207109 - LVS00207111; LVS00207112 - LVS00207113; LVS00207117 -
2 LVS00207118; LVS00207136; LVS00207137 - LVS00207139; LVS00207140 - LVS00207141;
3 LVS00207142 - LVS00207143; LVS00207144 - LVS00207146; LVS00207147 - LVS00207148;
4 LVS00207149 - LVS00207150; LVS00207151; LVS00207152; LVS00207153; LVS00207161 -
5 LVS00207165; LVS00207166; LVS00207178 - LVS00207179; LVS00207186; LVS00207232 -
6 LVS00207233; LVS00207242 - LVS00207243; LVS00207244; LVS00207250; LVS00207287 -
7 LVS00207292; LVS00207293 - LVS00207294; LVS00207296; LVS00207297; LVS00207298 -
8 LVS00207300; LVS00207301 - LVS00207302; LVS00207305; LVS00207309 - LVS00207315;
9 LVS00207320; LVS00207328; LVS00207329; LVS00207338 - LVS00207343; LVS00207350;
10 LVS00207355 - LVS00207358; LVS00207359 - LVS00207362; LVS00207363 - LVS00207365;
11 LVS00207366 - LVS00207369; LVS00207370 - LVS00207372; LVS00207373 - LVS00207374;
12 LVS00207375 - LVS00207380; LVS00207382 - LVS00207386; LVS00207393 - LVS00207400;
13 LVS00207401 - LVS00207405; LVS00207406 - LVS00207410; LVS00207411 - LVS00207413;
14 LVS00207415 - LVS00207416; LVS00207431 - LVS00207433; LVS00207434 - LVS00207435;
15 LVS00207473; LVS00207474 - LVS00207478; LVS00207610 - LVS00207612; LVS00207613;
16 LVS00207614 - LVS00207615; LVS00207616; LVS00207617; LVS00207641; LVS00207642 -
17 LVS00207649; LVS00207652 - LVS00207653; LVS00207657 - LVS00207658; LVS00207661 -
18 LVS00207662; LVS00207663 - LVS00207670; LVS00207673 - LVS00207674; LVS00207704 -
19 LVS00207705; LVS00207711 - LVS00207712; LVS00207734 - LVS00207741; LVS00207742;
20 LVS00207743; LVS00207755 - LVS00207766; LVS00207769; LVS00207770 - LVS00207780;
21 LVS00207781 - LVS00207791; LVS00207797; LVS00207817; LVS00207818; LVS00207819 -
22 LVS00207820; LVS00208053; LVS00208084; LVS00208085 - LVS00208095; LVS00208096 -
23 LVS00208109; LVS00208123; LVS00208124; LVS00208149 - LVS00208153; LVS00208154 -
24 LVS00208155; LVS00208158; LVS00208164 - LVS00208165; LVS00208166; LVS00208184 -
25 LVS00208185; LVS00208209; LVS00208210; LVS00208233 - LVS00208241; LVS00208265 -
26 LVS00208272; LVS00208273 - LVS00208274; LVS00208275; LVS00208276 - LVS00208277;
27 LVS00208278 - LVS00208284; LVS00208285 - LVS00208286; LVS00208287 - LVS00208293;
28 LVS00208299; LVS00208300; LVS00208301 - LVS00208303; LVS00208310 - LVS00208312;

1 LVS00208316; LVS00208350 - LVS00208352; LVS00208353; LVS00208354 - LVS00208355;
2 LVS00208393 - LVS00208394; LVS00208395 - LVS00208397; LVS00208398 - LVS00208399;
3 LVS00208400 - LVS00208402; LVS00208403; LVS00208404; LVS00208441 - LVS00208442;
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17 LVS00128377 - LVS00128379; LVS00128380 - LVS00128380

18 **REQUEST FOR PRODUCTION NO. 10:**

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

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

24 LVSC incorporates the Preliminary Statement and each of the General Objections as
25 though fully set forth herein.

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

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 LVSC Bates
3 labeled as:

4 LVS00119481 - LVS00119481; LVS00119482 - LVS00119507; LVS00119508 - LVS00119508

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

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

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

12 LVSC incorporates the Preliminary Statement and each of the General Objections as
13 though fully set forth herein.

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

20 LVS00119796 - LVS00119798; LVS00119862 - LVS00119866; LVS00119881 - LVS00119884;
21 LVS00119904 - LVS00119910; LVS00119927 - LVS00119929; LVS00119955 - LVS00119956;
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6 LVS00123673 - LVS00123675; LVS00123737 - LVS00123739; LVS00123756 - LVS00123758;
7 LVS00123763 - LVS00123763; LVS00123764 - LVS00123766; LVS00123767 - LVS00123773;
8 LVS00123774 - LVS00123775; LVS00123819 - LVS00123822; LVS00123829 - LVS00123833;
9 LVS00123838 - LVS00123994; LVS00124002 - LVS00124003; LVS00124004 - LVS00124005;
10 LVS00124008 - LVS00124010; LVS00124019 - LVS00124020; LVS00124021 - LVS00124028;
11 LVS00124044 - LVS00124050; LVS00124051 - LVS00124057; LVS00124084 - LVS00124084;
12 LVS00124085 - LVS00124086; LVS00124096 - LVS00124098; LVS00124099 - LVS00124100;
13 LVS00124111 - LVS00124116; LVS00124117 - LVS00124123; LVS00124125 - LVS00124127;
14 LVS00124130 - LVS00124131; LVS00124228 - LVS00124230; LVS00124262 - LVS00124266;
15 LVS00124267 - LVS00124268; LVS00124285 - LVS00124287; LVS00124298 - LVS00124298;
16 LVS00124299 - LVS00124300; LVS00124307 - LVS00124308; LVS00124309 - LVS00124309;
17 LVS00124319 - LVS00124320; LVS00124326 - LVS00124332; LVS00124337 - LVS00124341;
18 LVS00124342 - LVS00124346; LVS00124383 - LVS00124385; LVS00124503 - LVS00124508;
19 LVS00124512 - LVS00124513; LVS00124514 - LVS00124515; LVS00124516 - LVS00124520;
20 LVS00124521 - LVS00124525; LVS00124528 - LVS00124531; LVS00124532 - LVS00124535;
21 LVS00124569 - LVS00124574; LVS00124579 - LVS00124580; LVS00124583 - LVS00124583;
22 LVS00124584 - LVS00124586; LVS00124587 - LVS00124588; LVS00124589 - LVS00124590;
23 LVS00124591 - LVS00124593; LVS00124596 - LVS00124599; LVS00124600 - LVS00124603;
24 LVS00124604 - LVS00124606; LVS00124607 - LVS00124611; LVS00124837 - LVS00124838;
25 LVS00124840 - LVS00124842; LVS00124856 - LVS00124858; LVS00124910 - LVS00124911;
26 LVS00124912 - LVS00124914; LVS00124915 - LVS00124915; LVS00124916 - LVS00124918;
27 LVS00124919 - LVS00124921; LVS00124922 - LVS00124923; LVS00124927 - LVS00124930;
28 LVS00124931 - LVS00124935; LVS00124953 - LVS00124953; LVS00124967 - LVS00124969;

1 LVS00124974 - LVS00124977; LVS00124981 - LVS00124984; LVS00124986 - LVS00124989;
2 LVS00125027 - LVS00125028; LVS00125029 - LVS00125029; LVS00125038 - LVS00125096;
3 LVS00125188 - LVS00125246; LVS00125337 - LVS00125348; LVS00125354 - LVS00125365;
4 LVS00125372 - LVS00125528; LVS00125529 - LVS00125532; LVS00125533 - LVS00125535;
5 LVS00125539 - LVS00125540; LVS00126132 - LVS00126132; LVS00126522 - LVS00126533;
6 LVS00126548 - LVS00126559; LVS00126655 - LVS00126658; LVS00126661 - LVS00126662;
7 LVS00126911 - LVS00126912; LVS00126913 - LVS00126950; LVS00126979 - LVS00126982;
8 LVS00126983 - LVS00126987; LVS00126988 - LVS00126992; LVS00126993 - LVS00126997;
9 LVS00127008 - LVS00127010; LVS00127014 - LVS00127014; LVS00127015 - LVS00127017;
10 LVS00127018 - LVS00127018; LVS00127019 - LVS00127021; LVS00127038 - LVS00127039;
11 LVS00127040 - LVS00127042; LVS00127043 - LVS00127045; LVS00127046 - LVS00127049;
12 LVS00127050 - LVS00127053; LVS00127056 - LVS00127059; LVS00127101 - LVS00127101;
13 LVS00127107 - LVS00127107; LVS00127115 - LVS00127116; LVS00127123 - LVS00127124;
14 LVS00127125 - LVS00127126; LVS00127150 - LVS00127152; LVS00127153 - LVS00127155;
15 LVS00127161 - LVS00127161; LVS00127164 - LVS00127164; LVS00127165 - LVS00127166;
16 LVS00127169 - LVS00127174; LVS00127175 - LVS00127181; LVS00127182 - LVS00127188;
17 LVS00127189 - LVS00127194; LVS00127196 - LVS00127202; LVS00127203 - LVS00127209;
18 LVS00127213 - LVS00127213; LVS00127214 - LVS00127215; LVS00127251 - LVS00127252;
19 LVS00127253 - LVS00127254; LVS00127255 - LVS00127257; LVS00127267 - LVS00127269;
20 LVS00127273 - LVS00127273; LVS00127274 - LVS00127274; LVS00127275 - LVS00127276;
21 LVS00127277 - LVS00127279; LVS00127280 - LVS00127282; LVS00127321 - LVS00127321;
22 LVS00127348 - LVS00127349; LVS00127350 - LVS00127351; LVS00127352 - LVS00127353;
23 LVS00127354 - LVS00127358; LVS00127359 - LVS00127364; LVS00127365 - LVS00127370;
24 LVS00127373 - LVS00127375; LVS00127376 - LVS00127378; LVS00127379 - LVS00127382;
25 LVS00127383 - LVS00127386; LVS00127387 - LVS00127390; LVS00127391 - LVS00127394;
26 LVS00127398 - LVS00127399; LVS00127400 - LVS00127402; LVS00127403 - LVS00127403;
27 LVS00127410 - LVS00127410; LVS00127415 - LVS00127415; LVS00127426 - LVS00127426;
28 LVS00127427 - LVS00127428; LVS00127460 - LVS00127464; LVS00127467 - LVS00127469;

1 LVS00127470 - LVS00127474; LVS00127479 - LVS00127481; LVS00127482 - LVS00127483;
2 LVS00127504 - LVS00127507; LVS00127557 - LVS00127557; LVS00127559 - LVS00127560;
3 LVS00127565 - LVS00127567; LVS00127574 - LVS00127576; LVS00127630 - LVS00127631;
4 LVS00127636 - LVS00127638; LVS00127654 - LVS00127655; LVS00127656 - LVS00127657;
5 LVS00127658 - LVS00127660; LVS00127672 - LVS00127672; LVS00127677 - LVS00127678;
6 LVS00127683 - LVS00127684; LVS00127720 - LVS00127724; LVS00127866 - LVS00127870;
7 LVS00127871 - LVS00127875; LVS00127877 - LVS00127964; LVS00127965 - LVS00127965;
8 LVS00127966 - LVS00128045; LVS00128147 - LVS00128147; LVS00128151 - LVS00128154;
9 LVS00128157 - LVS00128160; LVS00128181 - LVS00128268

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

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

16
17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

18 LVSC incorporates the Preliminary Statement and each of the General Objections as
19 though fully set forth herein.

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

26 LVS00119627 - LVS00119628; LVS00119726 - LVS00119726; LVS00120022 - LVS00120024;
27 LVS00120429 - LVS00120430; LVS00120431 - LVS00120431; LVS00120617 - LVS00120618;
28 LVS00120681 - LVS00120686; LVS00120687 - LVS00120691; LVS00120692 - LVS00120696;

1 LVS00120697 - LVS00120701; LVS00121248 - LVS00121248; LVS00121249 - LVS00121249;
2 LVS00121292 - LVS00121295; LVS00121635 - LVS00121635; LVS00122012 - LVS00122012;
3 LVS00122013 - LVS00122013; LVS00122014 - LVS00122014; LVS00122074 - LVS00122076;
4 LVS00122298 - LVS00122298; LVS00122299 - LVS00122300; LVS00122361 - LVS00122361;
5 LVS00122364 - LVS00122366; LVS00122640 - LVS00122641; LVS00122642 - LVS00122643;
6 LVS00122645 - LVS00122648; LVS00122668 - LVS00122669; LVS00122670 - LVS00122670;
7 LVS00122751 - LVS00122751; LVS00122752 - LVS00122759; LVS00122760 - LVS00122760;
8 LVS00122761 - LVS00122767; LVS00122769 - LVS00122769; LVS00122770 - LVS00122777;
9 LVS00122778 - LVS00122784; LVS00122789 - LVS00122789; LVS00122790 - LVS00122797;
10 LVS00122798 - LVS00122798; LVS00122799 - LVS00122805; LVS00122843 - LVS00122846;
11 LVS00122907 - LVS00122909; LVS00123548 - LVS00123548; LVS00123608 - LVS00123608;
12 LVS00123662 - LVS00123664; LVS00123689 - LVS00123689; LVS00123690 - LVS00123696;
13 LVS00123697 - LVS00123697; LVS00123698 - LVS00123705; LVS00123706 - LVS00123712;
14 LVS00123753 - LVS00123755; LVS00123776 - LVS00123776; LVS00123777 - LVS00123784;
15 LVS00123785 - LVS00123786; LVS00123789 - LVS00123789; LVS00123810 - LVS00123812;
16 LVS00124016 - LVS00124018; LVS00124074 - LVS00124077; LVS00124132 - LVS00124133;
17 LVS00124252 - LVS00124253; LVS00124312 - LVS00124314; LVS00124317 - LVS00124318;
18 LVS00124347 - LVS00124347; LVS00124360 - LVS00124361; LVS00124362 - LVS00124377;
19 LVS00124526 - LVS00124527; LVS00124577 - LVS00124578; LVS00124863 - LVS00124863;
20 LVS00124949 - LVS00124952; LVS00126069 - LVS00126074; LVS00126075 - LVS00126080;
21 LVS00126081 - LVS00126085; LVS00126086 - LVS00126090; LVS00126094 - LVS00126097;
22 LVS00126098 - LVS00126101; LVS00126102 - LVS00126105; LVS00126174 - LVS00126177;
23 LVS00126349 - LVS00126351; LVS00126352 - LVS00126354; LVS00126355 - LVS00126357;
24 LVS00126358 - LVS00126359; LVS00126649 - LVS00126652; LVS00126693 - LVS00126694;
25 LVS00126697 - LVS00126699; LVS00126707 - LVS00126710; LVS00126763 - LVS00126778;
26 LVS00126951 - LVS00126951; LVS00126952 - LVS00126959; LVS00126960 - LVS00126961;
27 LVS00126962 - LVS00126962; LVS00126963 - LVS00126969; LVS00126970 - LVS00126970;
28 LVS00126971 - LVS00126978; LVS00127000 - LVS00127000; LVS00127001 - LVS00127007;

1 LVS00127291 - LVS00127292; LVS00127293 - LVS00127295; LVS00127296 - LVS00127298;
2 LVS00127299 - LVS00127301; LVS00127302 - LVS00127304; LVS00127305 - LVS00127307;
3 LVS00127308 - LVS00127310; LVS00127311 - LVS00127314; LVS00127439 - LVS00127441;
4 LVS00127449 - LVS00127452; LVS00127492 - LVS00127494; LVS00127495 - LVS00127497;
5 LVS00127730 - LVS00127731; LVS00127732 - LVS00127744; LVS00127745 - LVS00127751;
6 LVS00128321 - LVS00128321

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

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

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

18 LVSC incorporates the Preliminary Statement and each of the General Objections as
19 though fully set forth herein.

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

26 LVS00119459 - LVS00119461; LVS00119462 - LVS00119462; LVS00119463 - LVS00119464;
27 LVS00119465 - LVS00119466; LVS00119467 - LVS00119468; LVS00119474 - LVS00119476;
28 LVS00119477 - LVS00119478; LVS00119479 - LVS00119480; LVS00119513 - LVS00119514;

1 LVS00119515 - LVS00119516; LVS00119517 - LVS00119518; LVS00119519 - LVS00119521;
2 LVS00119522 - LVS00119523; LVS00119524 - LVS00119525; LVS00119526 - LVS00119527;
3 LVS00119528 - LVS00119529; LVS00119530 - LVS00119531; LVS00119532 - LVS00119534;
4 LVS00119535 - LVS00119536; LVS00119537 - LVS00119538; LVS00119539 - LVS00119541;
5 LVS00119542 - LVS00119544; LVS00119545 - LVS00119546; LVS00119547 - LVS00119551;
6 LVS00119552 - LVS00119555; LVS00119556 - LVS00119558; LVS00119559 - LVS00119561;
7 LVS00119562 - LVS00119563; LVS00119567 - LVS00119571; LVS00119572 - LVS00119612;
8 LVS00119613 - LVS00119615; LVS00119616 - LVS00119617; LVS00119618 - LVS00119621;
9 LVS00119622 - LVS00119623; LVS00119624 - LVS00119625; LVS00119627 - LVS00119628;
10 LVS00119629 - LVS00119629; LVS00119630 - LVS00119631; LVS00119632 - LVS00119632;
11 LVS00119633 - LVS00119634; LVS00119635 - LVS00119635; LVS00119636 - LVS00119648;
12 LVS00119649 - LVS00119649; LVS00119650 - LVS00119650; LVS00119651 - LVS00119651;
13 LVS00119652 - LVS00119652; LVS00119654 - LVS00119655; LVS00119656 - LVS00119657;
14 LVS00119662 - LVS00119664; LVS00119665 - LVS00119666; LVS00119667 - LVS00119668;
15 LVS00119669 - LVS00119670; LVS00119671 - LVS00119672; LVS00119673 - LVS00119674;
16 LVS00119675 - LVS00119677; LVS00119678 - LVS00119682; LVS00119683 - LVS00119686;
17 LVS00119687 - LVS00119689; LVS00119690 - LVS00119692; LVS00119693 - LVS00119694;
18 LVS00119697 - LVS00119700; LVS00119701 - LVS00119701; LVS00119702 - LVS00119703;
19 LVS00119707 - LVS00119708; LVS00119709 - LVS00119710; LVS00119711 - LVS00119712;
20 LVS00119713 - LVS00119714; LVS00119715 - LVS00119722; LVS00119734 - LVS00119734;
21 LVS00119735 - LVS00119739; LVS00119740 - LVS00119740; LVS00119741 - LVS00119745;
22 LVS00119747 - LVS00119750; LVS00119755 - LVS00119769; LVS00119770 - LVS00119771;
23 LVS00119784 - LVS00119784; LVS00119793 - LVS00119793; LVS00119802 - LVS00119802;
24 LVS00119803 - LVS00119807; LVS00119808 - LVS00119809; LVS00119810 - LVS00119811;
25 LVS00119815 - LVS00119819; LVS00119830 - LVS00119830; LVS00119831 - LVS00119835;
26 LVS00119840 - LVS00119840; LVS00119841 - LVS00119841; LVS00119851 - LVS00119853;
27 LVS00119854 - LVS00119856; LVS00119857 - LVS00119860; LVS00119861 - LVS00119861;
28 LVS00119867 - LVS00119867; LVS00119868 - LVS00119868; LVS00119892 - LVS00119892;

1 LVS00119922 - LVS00119922; LVS00119924 - LVS00119926; LVS00119933 - LVS00119933;
2 LVS00119934 - LVS00119938; LVS00119939 - LVS00119939; LVS00119940 - LVS00119941;
3 LVS00119942 - LVS00119942; LVS00119945 - LVS00119949; LVS00119978 - LVS00119979;
4 LVS00119980 - LVS00119980; LVS00119981 - LVS00119985; LVS00119986 - LVS00119986;
5 LVS00119987 - LVS00119991; LVS00119992 - LVS00119992; LVS00119993 - LVS00119997;
6 LVS00119998 - LVS00119999; LVS00120014 - LVS00120017; LVS00120018 - LVS00120019;
7 LVS00120020 - LVS00120020; LVS00120025 - LVS00120026; LVS00120030 - LVS00120031;
8 LVS00120034 - LVS00120036; LVS00120037 - LVS00120037; LVS00120038 - LVS00120042;
9 LVS00120043 - LVS00120044; LVS00120051 - LVS00120051; LVS00120052 - LVS00120056;
10 LVS00120057 - LVS00120057; LVS00120058 - LVS00120062; LVS00120063 - LVS00120063;
11 LVS00120064 - LVS00120068; LVS00120069 - LVS00120070; LVS00120071 - LVS00120072;
12 LVS00120084 - LVS00120084; LVS00120093 - LVS00120094; LVS00120098 - LVS00120098;
13 LVS00120099 - LVS00120103; LVS00120104 - LVS00120104; LVS00120105 - LVS00120105;
14 LVS00120106 - LVS00120106; LVS00120107 - LVS00120107; LVS00120108 - LVS00120112;
15 LVS00120113 - LVS00120115; LVS00120116 - LVS00120117; LVS00120122 - LVS00120123;
16 LVS00120156 - LVS00120157; LVS00120158 - LVS00120159; LVS00120160 - LVS00120160;
17 LVS00120161 - LVS00120165; LVS00120186 - LVS00120186; LVS00120187 - LVS00120191;
18 LVS00120192 - LVS00120192; LVS00120193 - LVS00120197; LVS00120198 - LVS00120198;
19 LVS00120199 - LVS00120203; LVS00120204 - LVS00120204; LVS00120231 - LVS00120234;
20 LVS00120235 - LVS00120237; LVS00120238 - LVS00120238; LVS00120239 - LVS00120243;
21 LVS00120244 - LVS00120244; LVS00120245 - LVS00120249; LVS00120250 - LVS00120250;
22 LVS00120251 - LVS00120255; LVS00120256 - LVS00120256; LVS00120257 - LVS00120259;
23 LVS00120261 - LVS00120261; LVS00120274 - LVS00120274; LVS00120282 - LVS00120282;
24 LVS00120283 - LVS00120287; LVS00120288 - LVS00120288; LVS00120289 - LVS00120289;
25 LVS00120290 - LVS00120294; LVS00120308 - LVS00120309; LVS00120377 - LVS00120378;
26 LVS00120383 - LVS00120385; LVS00120394 - LVS00120395; LVS00120401 - LVS00120401;
27 LVS00120402 - LVS00120402; LVS00120405 - LVS00120405; LVS00120406 - LVS00120406;
28 LVS00120451 - LVS00120453; LVS00120455 - LVS00120455; LVS00120456 - LVS00120460;

1 LVS00120461 - LVS00120462; LVS00120463 - LVS00120464; LVS00120468 - LVS00120469;
2 LVS00120482 - LVS00120482; LVS00120483 - LVS00120487; LVS00120489 - LVS00120489;
3 LVS00120503 - LVS00120503; LVS00120570 - LVS00120571; LVS00120572 - LVS00120572;
4 LVS00120573 - LVS00120573; LVS00120577 - LVS00120577; LVS00120583 - LVS00120583;
5 LVS00120584 - LVS00120588; LVS00120589 - LVS00120589; LVS00120590 - LVS00120594;
6 LVS00120602 - LVS00120602; LVS00120603 - LVS00120603; LVS00120610 - LVS00120612;
7 LVS00120632 - LVS00120632; LVS00120633 - LVS00120633; LVS00120635 - LVS00120640;
8 LVS00120641 - LVS00120642; LVS00120643 - LVS00120643; LVS00120654 - LVS00120654;
9 LVS00120655 - LVS00120659; LVS00120660 - LVS00120660; LVS00121166 - LVS00121166;
10 LVS00121167 - LVS00121168; LVS00121174 - LVS00121175; LVS00121290 - LVS00121290;
11 LVS00121378 - LVS00121379; LVS00121535 - LVS00121536; LVS00121578 - LVS00121579;
12 LVS00121920 - LVS00121920; LVS00121921 - LVS00121921; LVS00121925 - LVS00121925;
13 LVS00121927 - LVS00121927; LVS00121931 - LVS00121932; LVS00122861 - LVS00122861;
14 LVS00123456 - LVS00123456; LVS00123457 - LVS00123457; LVS00123678 - LVS00123678;
15 LVS00123679 - LVS00123680; LVS00123681 - LVS00123681; LVS00124219 - LVS00124219;
16 LVS00124245 - LVS00124246; LVS00124292 - LVS00124292; LVS00124354 - LVS00124354;
17 LVS00124886 - LVS00124886; LVS00124944 - LVS00124945; LVS00125031 - LVS00125034;
18 LVS00125577 - LVS00125577; LVS00125578 - LVS00125578; LVS00125579 - LVS00125580;
19 LVS00125581 - LVS00125582; LVS00125583 - LVS00125583; LVS00126151 - LVS00126151;
20 LVS00126189 - LVS00126191; LVS00126202 - LVS00126202; LVS00126203 - LVS00126204;
21 LVS00126205 - LVS00126205; LVS00126669 - LVS00126669; LVS00126692 - LVS00126692;
22 LVS00127246 - LVS00127246; LVS00127247 - LVS00127248; LVS00127249 - LVS00127249;
23 LVS00127458 - LVS00127458; LVS00127541 - LVS00127541; LVS00127554 - LVS00127555;
24 LVS00127605 - LVS00127606; LVS00128270 - LVS00128270; LVS00128271 - LVS00128276;
25 LVS00128277 - LVS00128277; LVS00128322 - LVS00128322; LVS00128323 - LVS00128326;
26 LVS00128327 - LVS00128331; LVS00128332 - LVS00128332; LVS00128337 - LVS00128340;
27 LVS00128345 - LVS00128346; LVS00128347 - LVS00128348; LVS00128349 - LVS00128350;
28 LVS00128351 - LVS00128352; LVS00128353 - LVS00128355; LVS00128356 - LVS00128357;

1 LVS00128358 - LVS00128359; LVS00128363 - LVS00128363; LVS00128364 - LVS00128365;
2 LVS00128366 - LVS00128367; LVS00128368 - LVS00128368; LVS00128371 - LVS00128372;
3 LVS00128373 - LVS00128374; LVS00128375 - LVS00128376; LVS00128377 - LVS00128379

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

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

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

9 LVSC incorporates the Preliminary Statement and each of the General Objections as
10 though fully set forth herein.

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

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 LVSC Bates
16 labeled as:
17 LVS00119877 - LVS00119878; LVS00119886 - LVS00119886; LVS00120262 - LVS00120262;
18 LVS00120379 - LVS00120382; LVS00120434 - LVS00120435; LVS00120470 - LVS00120470;
19 LVS00120471 - LVS00120471; LVS00120500 - LVS00120502; LVS00120621 - LVS00120622;
20 LVS00120623 - LVS00120624; LVS00120664 - LVS00120664; LVS00127108 - LVS00127108

21 **REQUEST FOR PRODUCTION NO. 17:**

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

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

26 LVSC incorporates the Preliminary Statement and each of the General Objections as
27 though fully set forth herein.

28 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
5 labeled as:

6 LVS00119469 - LVS00119473; LVS00119509 - LVS00119512; LVS00119565 - LVS00119565;
7 LVS00119566 - LVS00119566; LVS00119658 - LVS00119661; LVS00119695 - LVS00119695;
8 LVS00119696 - LVS00119696; LVS00119723 - LVS00119725; LVS00119812 - LVS00119814;
9 LVS00119820 - LVS00119822; LVS00119823 - LVS00119825; LVS00119911 - LVS00119912;
10 LVS00119950 - LVS00119954; LVS00119958 - LVS00119959; LVS00119963 - LVS00119965;
11 LVS00119966 - LVS00119967; LVS00120027 - LVS00120029; LVS00120075 - LVS00120075;
12 LVS00120076 - LVS00120081; LVS00120083 - LVS00120083; LVS00120207 - LVS00120210;
13 LVS00120386 - LVS00120387; LVS00120432 - LVS00120432; LVS00120434 - LVS00120435;
14 LVS00120472 - LVS00120475; LVS00120476 - LVS00120477; LVS00120575 - LVS00120576;
15 LVS00120613 - LVS00120614; LVS00120623 - LVS00120624; LVS00120625 - LVS00120626;
16 LVS00120760 - LVS00120764; LVS00120773 - LVS00120778; LVS00120779 - LVS00120785;
17 LVS00121778 - LVS00121782; LVS00121783 - LVS00121786; LVS00121787 - LVS00121790;
18 LVS00121791 - LVS00121793; LVS00122562 - LVS00122562; LVS00122601 - LVS00122603;
19 LVS00122604 - LVS00122605; LVS00122606 - LVS00122606; LVS00122607 - LVS00122609;
20 LVS00122610 - LVS00122611; LVS00123686 - LVS00123686; LVS00123761 - LVS00123762;
21 LVS00123825 - LVS00123826; LVS00127022 - LVS00127022; LVS00127023 - LVS00127024;
22 LVS00127031 - LVS00127033; LVS00127642 - LVS00127643; LVS00127644 - LVS00127645;
23 LVS00127646 - LVS00127648; LVS00127666 - LVS00127667; LVS00127668 - LVS00127670;
24 LVS00128360 - LVS00128362; LVS00128369 - LVS00128370

25 **REQUEST FOR PRODUCTION NO. 18:**

26 Please identify and produce all documents that reflect communications by and between
27 Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's
28

1 behalf) and Bally Technologies, Inc., during the time period of January 1, 2009 to October 20,
2 2010.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

4 LVSC incorporates the Preliminary Statement and each of the General Objections as
5 though fully set forth herein.

6 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
11 labeled as:

12 LVS00126740 - LVS00126742; LVS00126748 - LVS00126749; LVS00126750 - LVS00126755

13 **REQUEST FOR PRODUCTION NO. 21:**

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

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

19 LVSC incorporates the Preliminary Statement and each of the General Objections as
20 though fully set forth herein.

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

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

27 LVS00120410 - LVS00120428; LVS00120862 - LVS00120864; LVS00120887 - LVS00120995;
28 LVS00122716 - LVS00122722; LVS00122948 - LVS00122951; LVS00123001 - LVS00123004;

1 LVS00123513 - LVS00123515; LVS00123819 - LVS00123822; LVS00124084 - LVS00124084;
2 LVS00124298 - LVS00124298; LVS00127043 - LVS00127045; LVS00127046 - LVS00127049;
3 LVS00127050 - LVS00127053; LVS00127056 - LVS00127059; LVS00127966 - LVS00128045;
4 LVS00128165 - LVS00128165

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

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

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

19 LVSC incorporates the Preliminary Statement and each of the General Objections as
20 though fully set forth herein.

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

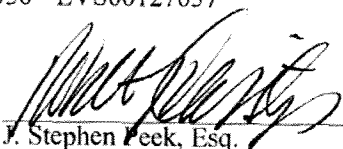
24 Subject to and without waiver of the foregoing objections (including the Preliminary
25 Statement and General Objections), please refer to the documents produced by LVSC Bates
26 labeled as:

27 LVS00121159 - LVS00121161; LVS00121162 - LVS00121165; LVS00121922 - LVS00121924;
28 LVS00122961 - LVS00122962; LVS00123713 - LVS00123715; LVS00123823 - LVS00123824;

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1 LVS00123995 - LVS00123997; LVS00124041 - LVS00124042; LVS00124107 - LVS00124109;
2 LVS00124938 - LVS00124941; LVS00124956 - LVS00124958; LVS00124959 - LVS00124960;
3 LVS00124961 - LVS00124962; LVS00127025 - LVS00127026; LVS00127027 - LVS00127028;
4 LVS00127029 - LVS00127030; LVS00127036 - LVS00127037

5 DATED August 14, 2012.

6 
7 J. Stephen Peek, Esq.
8 Robert J. Cassity, Esq.,
9 Holland & Hart LLP
10 9555 Hillwood Drive, 2nd Floor
11 Las Vegas, Nevada 89134

12 *Attorneys for Las Vegas Sands Corp. and Sands*
13 *China Ltd.*

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Las Vegas, Nevada 89134

CERTIFICATE OF SERVICE

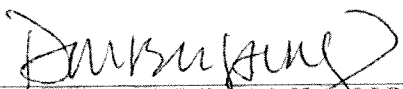
Pursuant to Nev. R. Civ. P. 5(b), I certify that on August 14, 2012, I served a true and correct copy of the foregoing **LAS VEGAS SANDS CORP.'S FIFTH SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-24)** by depositing same in the United States mail, first class postage fully prepaid to the persons and addresses listed below:

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Debra L. Spinelli, Esq.
Todd L. Bice, Esq.
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3883 Howard Hughes Parkway, Suite 800
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Attorneys for Defendant Sands China Ltd.


An Employee of Holland & Hart LLP

Dineen Bergsing

From: Dineen Bergsing
Sent: Tuesday, August 14, 2012 3:28 PM
To: James Pisanelli; 'Debra Spinelli'; Todd Bice; 'kap@pisanellibice.com'; 'see@pisanellibice.com'
Subject: LV Sands/Jacobs - LV Sands' Fifth Supplemental Responses to Plaintiff's First Request for Production of Documents (Nos. 1-24)
Attachments: 3177_001; 2012-08-08 - Letter to Pisanelli enclosing LVS00119459-LVS00128380.pdf

Please see attached LV Sands' Fifth Supplemental Responses to Plaintiff's First Request for Production of Documents (Nos. 1-24). A copy to follow by mail.

The documents have already been delivered to you on 8-8-12. See attached letter.

Thank you.

Dineen M. Bergsing

*Legal Assistant to J. Stephen Peek,
Justin C. Jones, David J. Freeman
and Nicole E. Lovelock*
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9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
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CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail. Thank you.

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21 *Attorneys for Sands China, LTD.*

DISTRICT COURT
CLARK COUNTY, NEVADA

18 STEVEN C. JACOBS,

19 Plaintiff,

20 v.

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

24 Defendants.

25 _____ /
26 AND ALL RELATED MATTERS.
27 _____
28

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

Date: n/a
Time: n/a

**LAS VEGAS SANDS CORP.'S SIXTH
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 Las Vegas Sands Corp. ("LVSC") hereby responds and objects to Plaintiff
5 Steven C. Jacobs' ("Plaintiff") First Request For Production Of Documents to Las Vegas Sands
6 Corp. ("Requests") as follows:

7 **PRELIMINARY STATEMENT**

8 1. LVSC'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
12 information identified in response to the Requests which may arise in any subsequent
13 proceedings in, or trial 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
16 proceeding 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
23 identification or production of privileged documents or information by LVSC is not a
24 waiver of any applicable 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.

27 **GENERAL OBJECTIONS**

28 1. LVSC objects to the Requests to the extent that they purport to impose obligations

1 upon LVSC greater than those contemplated in Rule 26(b) of the Nevada Rules of Civil
2 Procedure.

3 2. LVSC objects to the Requests to the extent that they seek the identification and/or
4 production of documents not in its possession, custody or control.

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

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

11 5. LVSC objects to the terms "You and/or Yours" as defined in the Requests, on the
12 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
13 without limitation, the inclusion of "any other affiliated entities, as well as owners, shareholders,
14 officers, employees, attorneys, accountants, agents, investigators, and/or anyone else acting on its
15 behalf and/or its direction and instruction."

16 6. LVSC objects to the term "Sands China" as defined in the Requests, on the
17 grounds that it is vague, ambiguous, overbroad, and unintelligible as worded, including without
18 limitation, the inclusion of "any of [SCL's] pre-incorporation, pre-spin-off, pre-IPO entities" and
19 "and/or anyone else acting on its own behalf and/or its direction and instruction" within the
20 definition. LVSC will construe the term "Sands China" or "SCL" to mean LVSC's subsidiary,
21 Sands China Limited.

22 7. LVSC objects to the terms "Parcels 5 and 6" as defined for the Requests, on the
23 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
24 without limitation, the inclusion of "parcels of property owned by Sands China located on the
25 Cotai Strip" within the definition.

26 8. LVSC objects to all the Requests to the extent that they assume a disputed legal
27 conclusion, namely, that LVSC and/or its employees acted as agents for SCL in conducting
28 business activities in Nevada. LVSC disputes that it or its employees acted as SCL's agent in

1 Nevada. To the extent that it produces documents in response to these Requests, LVSC does not
2 thereby admit that any agency relationship exists between LVSC and SCL.

3 9. LVSC objects to the extent that the Requests call for the disclosure of confidential,
4 personal, or proprietary business information, including without limitation, (i) confidential
5 information protected by contractual confidentiality obligations, (ii) confidential information
6 protected by rights of privacy held by SCL and/or other third parties, and (iii) personal
7 information protected from disclosure under Macau law. Such confidential, personal, or
8 proprietary business information will be produced pursuant to a protective order to be entered
9 among the parties and/or ordered by the Court.

10 10. LVSC further objects to each and every definition and instruction in the Requests
11 to the extent that it attempts or purports to impose obligations exceeding those authorized and
12 imposed by the Nevada Rules of Civil Procedure.

13 11. By responding to these Requests, LVSC does not in any way waive any rights or
14 objections, including but not limited to LVSC's objections to participation in this jurisdictional
15 discovery notwithstanding the Nevada Supreme Court's August 26, 2011 Writ of Mandamus and
16 stay of this litigation until the adjudication of the issue of whether the District Court holds
17 personal jurisdiction as to SCL.

18 Without waiving these General Objections, LVSC responds to the Requests as follows:

19 **RESPONSES**

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

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

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

27 LVSC incorporates the Preliminary Statement and each of the General Objections as
28 though fully set forth herein.

1 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
5 Statement and General Objections), please refer to the documents produced by LVSC Bates
6 labeled as: LVS00128811-LVS00128812; LVS00129783-LVS00129784; LVS00129799-
7 LVS00129800; LVS00130291-LVS00130294; LVS00130400; LVS00130401-LVS00130404;
8 LVS00130877-LVS00130878; LVS00130889-LVS00130893; LVS00130894-LVS00130895;
9 LVS00130896; LVS00131104-LVS00131105; LVS00131106-LVS00131110; LVS00131111-
10 LVS00131305; LVS00131307-LVS00131323; LVS00131331; LVS00131352-LVS00131353;
11 LVS00131387; LVS00131388-LVS00131389; LVS00132142-LVS00132143; LVS00132144-
12 LVS00132145; LVS00132175-LVS00132198; LVS00132199-LVS00132213; LVS00132215-
13 LVS00132237; LVS00132256-LVS00132267; LVS00132306-LVS00132308; LVS00132364-
14 LVS00132366; LVS00132369-LVS00132370; LVS00132385-LVS00132386; LVS00132879-
15 LVS00132880; LVS00132881; LVS00132882-LVS00132893; LVS00132899-LVS00132910;
16 LVS00133033-LVS00133034; LVS00133035-LVS00133039; LVS00133040-LVS00133234;
17 LVS00133236-LVS00133252; LVS00133260; LVS00133271-LVS00133272; LVS00133273-
18 LVS00133274; LVS00133304-LVS00133327; LVS00133328-LVS00133342; LVS00133344-
19 LVS00133366; LVS00133385-LVS00133396; LVS00133425; LVS00133426-LVS00133437;
20 LVS00133438-LVS00133440; LVS00133441; LVS00133442-LVS00133443; LVS00133923-
21 LVS00133924; LVS00133937-LVS00133939; LVS00133943-LVS00133945; LVS00133961-
22 LVS00133963; LVS00133971; LVS00133972-LVS00133983; LVS00133984-LVS00133986;
23 LVS00133992; LVS00133993-LVS00134001; LVS00134004; LVS00134056-LVS00134057;
24 LVS00134058; LVS00134180-LVS00134194; LVS00134234-LVS00134316; LVS00134556-
25 LVS00134558; LVS00134806-LVS00134807; LVS00135122-LVS00135128; LVS00135233-
26 LVS00135236; LVS00135237-LVS00135239; LVS00135240; LVS00135354-LVS00135358;
27 LVS00135359; LVS00135360-LVS00135365; LVS00135376-LVS00135377; LVS00135417-
28 LVS00135419; LVS00135434-LVS00135436; LVS00135720-LVS00135721; LVS00135722-

1 LVS00135727; LVS00135728-LVS00135730; LVS00135731-LVS00135736; LVS00135740-
2 LVS00135744; LVS00135748-LVS00135752; LVS00135756-LVS00135760; LVS00135772-
3 LVS00135777; LVS00135778-LVS00135782; LVS00135795-LVS00135797; LVS00135798-
4 LVS00135799; LVS00135800-LVS00135801; LVS00135802; LVS00136116-LVS00136122;
5 LVS00136123; LVS00136124-LVS00136132; LVS00136133-LVS00136134; LVS00136135;
6 LVS00136136-LVS00136147; LVS00136153-LVS00136164; LVS00136228-LVS00136229;
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10 LVS00136789; LVS00136819-LVS00136842; LVS00136843-LVS00136857; LVS00136859-
11 LVS00136881; LVS00136900-LVS00136911; LVS00136934-LVS00136937; LVS00136938-
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17 LVS00138191; LVS00138192; LVS00138193-LVS00138196; LVS00138197-LVS00138199;
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20 LVS00138772; LVS00138773-LVS00138777; LVS00138778-LVS00138972; LVS00138974-
21 LVS00138990; LVS00138998; LVS00138999-LVS00139000; LVS00139001-LVS00139002;
22 LVS00139032-LVS00139055; LVS00139056-LVS00139070; LVS00139072-LVS00139094;
23 LVS00139113-LVS00139124; LVS00139154-LVS00139156; LVS00139160-LVS00139162;
24 LVS00139174-LVS00139176; LVS00139177-LVS00139178; LVS00139179-LVS00139335;
25 LVS00139336; LVS00139337-LVS00139345; LVS00139346-LVS00139347; LVS00139348-
26 LVS00139349; LVS00139350; LVS00139469-LVS00139471; LVS00139487-LVS00139492;
27 LVS00139550-LVS00139551; LVS00139552; LVS00139866-LVS00139872; LVS00139873-
28 LVS00139876; LVS00139877-LVS00139878; LVS00139879; LVS00139985; LVS00139986-

1 LVS00139991; LVS00140030-LVS00140031; LVS00140046-LVS00140047; LVS00140543-
2 LVS00140545; LVS00140556-LVS00140558; LVS00140563-LVS00140564; LVS00140565-
3 LVS00140567; LVS00140568-LVS00140570; LVS00140571-LVS00140573; LVS00140643-
4 LVS00140644; LVS00140645-LVS00140647; LVS00140648-LVS00140650; LVS00140741-
5 LVS00140743; LVS00140778-LVS00140779; LVS00140780; LVS00140781; LVS00140782-
6 LVS00140784; LVS00140791-LVS00140796; LVS00140854-LVS00140855; LVS00140870-
7 LVS00140871; LVS00141460-LVS00141461; LVS00141462-LVS00141464; LVS00141471-
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24 LVS00144142; LVS00144143; LVS00144144-LVS00144146.

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

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

1 of January 1, 2009 to October 20, 2010.

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

3 LVSC incorporates the Preliminary Statement and each of the General Objections as
4 though fully set forth herein.

5 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
10 labeled as: LVS00128381; LVS00128382-LVS00128389; LVS00128390; LVS00128391;
11 LVS00128392-LVS00128404; LVS00128405; LVS00128406-LVS00128408; LVS00128409;
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28 LVS00141717; LVS00141718-LVS00141719; LVS00141724-LVS00141727; LVS00141728-

1 LVS00141750; LVS00141790; LVS00141864-LVS00141866; LVS00141867-LVS00141870;
2 LVS00141871-LVS00141874; LVS00141875-LVS00141876; LVS00141877; LVS00141878;
3 LVS00141879-LVS00141886; LVS00141887-LVS00141890; LVS00141891-LVS00141894;
4 LVS00141895-LVS00141898; LVS00141899-LVS00141900; LVS00141901; LVS00141902;
5 LVS00141903; LVS00141904-LVS00141905; LVS00141906; LVS00141907; LVS00141908;
6 LVS00141909-LVS00141910; LVS00141912-LVS00141992; LVS00141993-LVS00142015;
7 LVS00142016; LVS00142017-LVS00142019; LVS00142020-LVS00142042; LVS00142043-
8 LVS00142046; LVS00142047-LVS00142050; LVS00142051-LVS00142052; LVS00142053-
9 LVS00142057; LVS00142058-LVS00142252; LVS00142253; LVS00142271-LVS00142272;
10 LVS00142273-LVS00142277; LVS00142279; LVS00142280; LVS00142281-LVS00142283;
11 LVS00142284; LVS00142285-LVS00142309; LVS00142311; LVS00142312-LVS00142333;
12 LVS00142355-LVS00142495; LVS00142496-LVS00142636; LVS00142637-LVS00142647;
13 LVS00142758-LVS00142759; LVS00142760-LVS00142818; LVS00142819-LVS00142879;
14 LVS00142880-LVS00142907; LVS00142908-LVS00142909; LVS00142910-LVS00142970;
15 LVS00142971-LVS00143029; LVS00143030-LVS00143058; LVS00143061-LVS00143067;
16 LVS00143068-LVS00143086; LVS00143087; LVS00143088-LVS00143097; LVS00143098-
17 LVS00143100; LVS00143153-LVS00143154; LVS00143155; LVS00143158-LVS00143163;
18 LVS00143164-LVS00143219; LVS00143221; LVS00143224-LVS00143225; LVS00143230-
19 LVS00143231; LVS00143234-LVS00143235; LVS00143237-LVS00143238; LVS00143383-
20 LVS00143384; LVS00143491-LVS00143492; LVS00143493-LVS00143494; LVS00143495-
21 LVS00143499; LVS00143500-LVS00143694; LVS00143721; LVS00143722-LVS00143779;
22 LVS00143783-LVS00143784; LVS00144109-LVS00144115; LVS00144116-LVS00144118;
23 LVS00144123; LVS00144128-LVS00144130; LVS00144134-LVS00144136; LVS00144137;
24 LVS00144138-LVS00144140; LVS00144141-LVS00144142; LVS00144144-LVS00144146;
25 LVS00144147-LVS00144149; LVS00144150-LVS00144154; LVS00144155-LVS00144159.

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

27 Please identify and produce all documents that reflect the location of the negotiation and
28 execution of agreements related to the funding of Sands China, during the time period of January

1 1, 2009, to October 20, 2010, including, but not limited to, the raising of pre-IPO funds, the IPO,
2 underwriting for Sites 5 & 6, loan refinancing and/or covenant relief/term modifications pre-IPO,
3 the services of Bank of China to bring high net worth investors/gamblers to buy the Four Seasons
4 Serviced Apartments, and the written proposal of Leonel Alves to obtain strata-title for the Four
5 Seasons Apartments involving Beijing government officials.

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

7 LVSC incorporates the Preliminary Statement and each of the General Objections as
8 though fully set forth herein.

9 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
13 Statement and General Objections), please refer to the documents produced by LVSC Bates
14 labeled as: LVS00128382-LVS00128389; LVS00128666-LVS00128723; LVS00128726-
15 LVS00128731; LVS00128736-LVS00128739; LVS00128751-LVS00128766; LVS00128775-
16 LVS00128782; LVS00128793-LVS00128801; LVS00128802-LVS00128810; LVS00128813;
17 LVS00128814-LVS00128945; LVS00128986-LVS00129121; LVS00129122-LVS00129130;
18 LVS00129132-LVS00129140; LVS00129142-LVS00129170; LVS00129401-LVS00129406;
19 LVS00129479; LVS00129480-LVS00129526; LVS00129535-LVS00129614; LVS00129615;
20 LVS00129657-LVS00129733; LVS00129739-LVS00129746; LVS00129783-LVS00129784;
21 LVS00129801-LVS00130232; LVS00130406-LVS00130413; LVS00130418; LVS00130978-
22 LVS00131000; LVS00131096-LVS00131099; LVS00131100-LVS00131102; LVS00131106-
23 LVS00131110; LVS00131111-LVS00131305; LVS00131388-LVS00131389; LVS00131438;
24 LVS00131958-LVS00131963; LVS00132076-LVS00132127; LVS00132144-LVS00132145;
25 LVS00132175-LVS00132198; LVS00132238-LVS00132243; LVS00132244-LVS00132255;
26 LVS00132268-LVS00132287; LVS00132302-LVS00132303; LVS00132326-LVS00132328;
27 LVS00132343; LVS00132369-LVS00132370; LVS00132387-LVS00132818; LVS00132912-
28 LVS00132914; LVS00133035-LVS00133039; LVS00133040-LVS00133234; LVS00133261-

1 LVS00133263; LVS00133273-LVS00133274; LVS00133304-LVS00133327; LVS00133367-
2 LVS00133372; LVS00133397-LVS00133416; LVS00133426-LVS00133437; LVS00133442-
3 LVS00133443; LVS00133899-LVS00133906; LVS00133934-LVS00133935; LVS00133937-
4 LVS00133939; LVS00133940-LVS00133942; LVS00133960; LVS00133972-LVS00133983;
5 LVS00133993-LVS00134001; LVS00134140-LVS00134162; LVS00134164-LVS00134165;
6 LVS00134180-LVS00134194; LVS00134214-LVS00134216; LVS00134217-LVS00134219;
7 LVS00134234-LVS00134316; LVS00134317-LVS00134533; LVS00134571-LVS00134573;
8 LVS00134574-LVS00134576; LVS00134720-LVS00134725; LVS00134832-LVS00134859;
9 LVS00134860-LVS00135121; LVS00135233-LVS00135236; LVS00135322-LVS00135344;
10 LVS00135360-LVS00135365; LVS00135378-LVS00135380; LVS00135439-LVS00135446;
11 LVS00135448-LVS00135455; LVS00135457-LVS00135526; LVS00135722-LVS00135727;
12 LVS00135731-LVS00135736; LVS00135740-LVS00135744; LVS00135745-LVS00135747;
13 LVS00135748-LVS00135752; LVS00135753-LVS00135755; LVS00135772-LVS00135777;
14 LVS00135826-LVS00135853; LVS00135854-LVS00136115; LVS00136124-LVS00136132;
15 LVS00136230-LVS00136234; LVS00136235-LVS00136429; LVS00136450-LVS00136454;
16 LVS00136460-LVS00136464; LVS00136610-LVS00136632; LVS00136720-LVS00136742;
17 LVS00136782-LVS00136783; LVS00136788-LVS00136789; LVS00136819-LVS00136842;
18 LVS00136882-LVS00136887; LVS00136912-LVS00136931; LVS00136961-LVS00136962;
19 LVS00136979-LVS00137410; LVS00137467-LVS00137481; LVS00137485-LVS00137490;
20 LVS00137646-LVS00137648; LVS00137658; LVS00137674-LVS00137676; LVS00137677-
21 LVS00137678; LVS00137695-LVS00138126; LVS00138143-LVS00138181; LVS00138182-
22 LVS00138184; LVS00138200-LVS00138201; LVS00138218-LVS00138649; LVS00138738-
23 LVS00138740; LVS00138773-LVS00138777; LVS00138778-LVS00138972; LVS00139001-
24 LVS00139002; LVS00139032-LVS00139055; LVS00139095-LVS00139100; LVS00139125-
25 LVS00139144; LVS00139146-LVS00139153; LVS00139154-LVS00139156; LVS00139157-
26 LVS00139159; LVS00139179-LVS00139335; LVS00139337-LVS00139345; LVS00139432-
27 LVS00139454; LVS00139487-LVS00139492; LVS00139576-LVS00139603; LVS00139604-
28 LVS00139865; LVS00139873-LVS00139876; LVS00139961-LVS00139983; LVS00139986-

1 LVS00139991; LVS00140030-LVS00140031; LVS00140048-LVS00140479; LVS00140541-
2 LVS00140542; LVS00140548-LVS00140555; LVS00140589-LVS00140597; LVS00140598-
3 LVS00140640; LVS00140782-LVS00140784; LVS00140785-LVS00140787; LVS00140791-
4 LVS00140796; LVS00140854-LVS00140855; LVS00140872-LVS00141303; LVS00141378;
5 LVS00141379-LVS00141380; LVS00141537-LVS00141538; LVS00141568-LVS00141591;
6 LVS00141631-LVS00141636; LVS00141661-LVS00141680; LVS00141720-LVS00141721;
7 LVS00141751-LVS00141774; LVS00141814-LVS00141819; LVS00141844-LVS00141863;
8 LVS00141875-LVS00141876; LVS00142053-LVS00142057; LVS00142058-LVS00142252;
9 LVS00142310; LVS00142760-LVS00142818; LVS00142819-LVS00142879; LVS00142910-
10 LVS00142970; LVS00142971-LVS00143029; LVS00143030-LVS00143058; LVS00143101-
11 LVS00143152; LVS00143158-LVS00143163; LVS00143221; LVS00143222-LVS00143223;
12 LVS00143239-LVS00143240; LVS00143270-LVS00143293; LVS00143333-LVS00143338;
13 LVS00143363-LVS00143382; LVS00143495-LVS00143499; LVS00143500-LVS00143694;
14 LVS00143809-LVS00143836; LVS00143837-LVS00144098; LVS00144109-LVS00144115;
15 LVS00144144-LVS00144146.

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

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

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

26 LVSC incorporates the Preliminary Statement and each of the General Objections as
27 though fully set forth herein.

28 LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
5 labeled as: LVS00128726-LVS00128731; LVS00128735; LVS00128736-LVS00128739;
6 LVS00128747-LVS00128749; LVS00128771-LVS00128773; LVS00128949-LVS00128953;
7 LVS00128961-LVS00128963; LVS00128973-LVS00128976; LVS00128977-LVS00128979;
8 LVS00128980; LVS00128981; LVS00129464-LVS00129466; LVS00129471-LVS00129473;
9 LVS00129474; LVS00129475-LVS00129476; LVS00129477-LVS00129478; LVS00129528-
10 LVS00129530; LVS00129531-LVS00129533; LVS00129772-LVS00129773; LVS00129774-
11 LVS00129776; LVS00132021-LVS00132022; LVS00135527-LVS00135646; LVS00141465-
12 LVS00141466; LVS00141467-LVS00141468; LVS00141469-LVS00141470.

13 **REQUEST FOR PRODUCTION NO. 10:**

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

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

19 LVSC incorporates the Preliminary Statement and each of the General Objections as
20 though fully set forth herein.

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

24 Subject to and without waiver of the foregoing objections (including the Preliminary
25 Statement and General Objections), please refer to the documents produced by LVSC Bates
26 labeled as: LVS00128410-LVS00128503; LVS00128520-LVS00128657; LVS00128666-
27 LVS00128723; LVS00128751-LVS00128766; LVS00129480-LVS00129526; LVS00129535-
28 LVS00129614; LVS00129616-LVS00129636; LVS00129657-LVS00129733; LVS00129739-

1 LVS00129746; LVS00129801-LVS00130232; LVS00130755-LVS00130864; LVS00131111-
2 LVS00131305; LVS00131331; LVS00131776-LVS00131885; LVS00132076-LVS00132127;
3 LVS00132146-LVS00132147; LVS00132268-LVS00132287; LVS00132387-LVS00132818;
4 LVS00133040-LVS00133234; LVS00133260; LVS00133275-LVS00133276; LVS00133397-
5 LVS00133416; LVS00133788-LVS00133897; LVS00133940-LVS00133942; LVS00134020-
6 LVS00134052; LVS00134180-LVS00134194; LVS00134234-LVS00134316; LVS00134317-
7 LVS00134533; LVS00134693-LVS00134704; LVS00134705-LVS00134712; LVS00134832-
8 LVS00134859; LVS00134860-LVS00135121; LVS00135130-LVS00135187; LVS00135376-
9 LVS00135377; LVS00135527-LVS00135646; LVS00135826-LVS00135853; LVS00135854-
10 LVS00136115; LVS00136167-LVS00136224; LVS00136235-LVS00136429; LVS00136455;
11 LVS00136790-LVS00136791; LVS00136912-LVS00136931; LVS00136979-LVS00137410;
12 LVS00137467-LVS00137481; LVS00137695-LVS00138126; LVS00138218-LVS00138649;
13 LVS00138778-LVS00138972; LVS00138998; LVS00139003-LVS00139004; LVS00139125-
14 LVS00139144; LVS00139576-LVS00139603; LVS00139604-LVS00139865; LVS00140048-
15 LVS00140479; LVS00140653-LVS00140710; LVS00140872-LVS00141303; LVS00141484-
16 LVS00141495; LVS00141496-LVS00141503; LVS00141504-LVS00141508; LVS00141539-
17 LVS00141540; LVS00141661-LVS00141680; LVS00141722-LVS00141723; LVS00141844-
18 LVS00141863; LVS00142058-LVS00142252; LVS00142278; LVS00142648-LVS00142757;
19 LVS00142819-LVS00142879; LVS00142910-LVS00142970; LVS00143101-LVS00143152;
20 LVS00143241-LVS00143242; LVS00143363-LVS00143382; LVS00143491-LVS00143492;
21 LVS00143500-LVS00143694; LVS00143720; LVS00143722-LVS00143779; LVS00143809-
22 LVS00143836; LVS00143837-LVS00144098.

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

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

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

LVSC incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein.

LVSC 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.

Subject to and without waiver of the foregoing objections (including the Preliminary Statement and General Objections), please refer to the documents produced by LVSC Bates labeled as: LVS00128410-LVS00128503; LVS00129401-LVS00129406; LVS00129801-LVS00130232; LVS00130324-LVS00130325; LVS00130327-LVS00130328; LVS00130333; LVS00130345-LVS00130349; LVS00130350-LVS00130353; LVS00130441-LVS00130461; LVS00130879; LVS00131058-LVS00131061; LVS00131092-LVS00131095; LVS00131340-LVS00131342; LVS00131343-LVS00131345; LVS00131346-LVS00131348; LVS00131349-LVS00131351; LVS00131388-LVS00131389; LVS00131462-LVS00131482; LVS00131953-LVS00131954; LVS00131958-LVS00131963; LVS00132076-LVS00132127; LVS00132140-LVS00132141; LVS00132144-LVS00132145; LVS00132215-LVS00132237; LVS00132387-LVS00132818; LVS00132881; LVS00132942-LVS00133021; LVS00133273-LVS00133274; LVS00133344-LVS00133366; LVS00133426-LVS00133437; LVS00133442-LVS00133443; LVS00133474-LVS00133494; LVS00133972-LVS00133983; LVS00133993-LVS00134001; LVS00134005-LVS00134007; LVS00134166; LVS00134167-LVS00134169; LVS00134534-LVS00134541; LVS00134615-LVS00134618; LVS00134649-LVS00134652; LVS00134720-LVS00134725; LVS00135346-LVS00135348; LVS00135411-LVS00135414; LVS00136124-LVS00136132; LVS00136458-LVS00136459; LVS00136511-LVS00136514; LVS00136788-LVS00136789; LVS00136979-LVS00137410; LVS00137485-LVS00137490; LVS00137549-LVS00137628; LVS00137650-LVS00137651; LVS00137695-LVS00138126; LVS00138218-LVS00138649; LVS00139001-LVS00139002; LVS00139179-LVS00139335; LVS00139337-LVS00139345; LVS00139487-LVS00139492; LVS00140048-LVS00140479; LVS00140780; LVS00140791-LVS00140796; LVS00140872-LVS00141303; LVS00141387-LVS00141393;

1 LVS00141474-LVS00141476; LVS00141477; LVS00141478-LVS00141480; LVS00141504-
2 LVS00141508; LVS00141512-LVS00141514; LVS00141515-LVS00141522; LVS00141529-
3 LVS00141530; LVS00141531-LVS00141532; LVS00141533-LVS00141534; LVS00141537-
4 LVS00141538; LVS00141720-LVS00141721; LVS00142334-LVS00142354; LVS00142760-
5 LVS00142818; LVS00142971-LVS00143029; LVS00143101-LVS00143152; LVS00143158-
6 LVS00143163; LVS00143239-LVS00143240.

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

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

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

14 LVSC incorporates the Preliminary Statement and each of the General Objections as
15 though fully set forth herein.

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

19 Subject to and without waiver of the foregoing objections (including the Preliminary
20 Statement and General Objections), please refer to the documents produced by LVSC Bates
21 labeled as: LVS00128732-LVS00128733; LVS00128734; LVS00130373-LVS00130377;
22 LVS00130401-LVS00130404; LVS00130866-LVS00130871; LVS00131380-LVS00131383;
23 LVS00131384-LVS00131386; LVS00131405-LVS00131406; LVS00131888-LVS00131905;
24 LVS00131906-LVS00131924; LVS00132035-LVS00132036; LVS00132037-LVS00132043;
25 LVS00132128-LVS00132129; LVS00132131-LVS00132133; LVS00132137-LVS00132138;
26 LVS00132345-LVS00132348; LVS00133988-LVS00133990; LVS00134196-LVS00134199;
27 LVS00134203-LVS00134205; LVS00134542-LVS00134544; LVS00135662-LVS00135665;
28 LVS00135669-LVS00135671; LVS00135676-LVS00135678; LVS00135680-LVS00135683;

1 LVS00138186-LVS00138188; LVS00138193-LVS00138196; LVS00142281-LVS00142283;
2 LVS00144124-LVS00144127; LVS00144131-LVS00144133.

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

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

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

14 LVSC incorporates the Preliminary Statement and each of the General Objections as
15 though fully set forth herein.

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

19 Subject to and without waiver of the foregoing objections (including the Preliminary
20 Statement and General Objections), please refer to the documents produced by LVSC Bates
21 labeled as: LVS00128726-LVS00128731; LVS00128735; LVS00128736-LVS00128739;
22 LVS00128747-LVS00128749; LVS00128771-LVS00128773; LVS00128961-LVS00128963;
23 LVS00128977-LVS00128979; LVS00128980; LVS00129251-LVS00129384; LVS00129528-
24 LVS00129530; LVS00129531-LVS00129533; LVS00129772-LVS00129773; LVS00130321-
25 LVS00130322; LVS00130755-LVS00130864; LVS00131776-LVS00131885; LVS00132034;
26 LVS00133788-LVS00133897; LVS00142648-LVS00142757.

27 **REQUEST FOR PRODUCTION NO. 15:**

28 Please identify and produce all documents, memoranda, emails, and/or other

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

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

6 LVSC incorporates the Preliminary Statement and each of the General Objections as
7 though fully set forth herein.

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

11 Subject to and without waiver of the foregoing objections (including the Preliminary
12 Statement and General Objections), please refer to the documents produced by LVSC Bates
13 labeled as: LVS00130317; LVS00131004; LVS00131947-LVS00131950.

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

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

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

19 LVSC incorporates the Preliminary Statement and each of the General Objections as
20 though fully set forth herein.

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

24 Subject to and without waiver of the foregoing objections (including the Preliminary
25 Statement and General Objections), please refer to the documents produced by LVSC Bates
26 labeled as: LVS00128659-LVS00128664; LVS00128784-LVS00128790; LVS00129390-
27 LVS00129394; LVS00132296-LVS00132301; LVS00132338-LVS00132342; LVS00133927-
28 LVS00133933; LVS00134666-LVS00134670.

1 **REQUEST FOR PRODUCTION NO. 17:**

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

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

6 LVSC incorporates the Preliminary Statement and each of the General Objections as
7 though fully set forth herein.

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

11 Subject to and without waiver of the foregoing objections (including the Preliminary
12 Statement and General Objections), please refer to the documents produced by LVSC Bates
13 labeled as: LVS00128659-LVS00128664; LVS00128784-LVS00128790; LVS00129390-
14 LVS00129394; LVS00132296-LVS00132301; LVS00132338-LVS00132342; LVS00133927-
15 LVS00133933; LVS00134666-LVS00134670.

16 **REQUEST FOR PRODUCTION NO. 18:**

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

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

22 LVSC incorporates the Preliminary Statement and each of the General Objections as
23 though fully set forth herein.

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

27 Subject to and without waiver of the foregoing objections (including the Preliminary
28 Statement and General Objections), please refer to the documents produced by LVSC Bates

1 labeled as: LVS00128659-LVS00128664; LVS00128784-LVS00128790; LVS00129390-
2 LVS00129394; LVS00132296-LVS00132301; LVS00132338-LVS00132342; LVS00133927-
3 LVS00133933; LVS00134666-LVS00134670.

4 **REQUEST FOR PRODUCTION NO. 20:**

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

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

10 LVSC incorporates the Preliminary Statement and each of the General Objections as
11 though fully set forth herein.

12 LVSC objects to this request as overbroad and unduly burdensome insofar as it seeks "all
13 documents" responsive to the request, rather than an illustrative subset of documents that are
14 sufficient for Plaintiff to make his arguments on personal jurisdiction. LVSC also objects to this
15 request to the extent it calls for the disclosure of information protected from disclosure under the
16 attorney-client privilege, the attorney work-product privilege and any other privileges by statute,
17 common law, or otherwise.

18 Subject to and without waiver of the foregoing objections (including the Preliminary
19 Statement and General Objections), please refer to the documents produced by LVSC Bates
20 labeled as: LVS00129535-LVS00129614; LVS00132199-LVS00132213; LVS00132238-
21 LVS00132243; LVS00132244-LVS00132255; LVS00133328-LVS00133342; LVS00133367-
22 LVS00133372; LVS00133373-LVS00133384; LVS00134559-LVS00134570; LVS00135783-
23 LVS00135794; LVS00136843-LVS00136857; LVS00136888-LVS00136899; LVS00139056-
24 LVS00139070; LVS00139101-LVS00139112; LVS00139472-LVS00139483; LVS00141592-
25 LVS00141606; LVS00141637-LVS00141648; LVS00141775-LVS00141789; LVS00141820-
26 LVS00141831; LVS00143294-LVS00143308; LVS00143339-LVS00143350.

27 **REQUEST FOR PRODUCTION NO. 21:**

28 Please identify and produce all documents that reflect communications by and between

1 Sands China and/or LVSC (and/or any individual and/or entity acting for or on Sands China's
2 behalf) and site designers, developers, and specialists for Parcels 5 and 6, during the time period
3 of January 1, 2009 to October 20, 2010.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

5 LVSC incorporates the Preliminary Statement and each of the General Objections as
6 though fully set forth herein.

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

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 LVSC Bates
12 labeled as: LVS00130333; LVS00130334-LVS00130341; LVS00130345-LVS00130349;
13 LVS00130350-LVS00130353; LVS00131340-LVS00131342; LVS00131343-LVS00131345;
14 LVS00131346-LVS00131348; LVS00131349-LVS00131351.

15 DATED September 4, 2012.

16 
17 J. Stephen Peek, Esq.
18 Robert J. Cassity, Esq.
19 Holland & Hart LLP
20 9555 Hillwood Drive, 2nd Floor
21 Las Vegas, Nevada 89134

22 *Attorneys for Las Vegas Sands Corp. and Sands*
23 *China Ltd.*
24
25
26
27
28

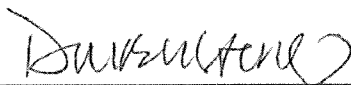
Holland & Hart LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134

CERTIFICATE OF SERVICE

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

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Attorney for Plaintiff


An Employee of Holland & Hart LLP

Dineen Bergsing

From: Dineen Bergsing
Sent: Tuesday, September 04, 2012 12:26 PM
To: 'jjp@pisanellibice.com'; 'dis@pisanellibice.com'; 'tlb@pisanellibice.com';
'kap@pisanellibice.com'; 'see@pisanellibice.com'
Subject: LV Sands/Jacobs - Defendants' Sixth Supplemental Responses to Plaintiff's First Request for
Production of Documents (Nos. 1-24)
Attachments: 3697_001

Please see attached Defendants' Sixth Supplemental Responses to Plaintiff's First Request for Production of Documents (Nos. 1-24). A copy to follow by mail.

Dineen M. Bergsing

*Legal Assistant to J. Stephen Peek,
Justin C. Jones, David J. Freeman
and Nicole E. Lovelock*
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13 *Attorneys for Las Vegas Sands Corp.*
14 *and Sands China, LTD.*

15
16 DISTRICT COURT
17 CLARK COUNTY, NEVADA

18 STEVEN C. JACOBS,
19 Plaintiff,
20 v.

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

Date: n/a
Time: n/a

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

23 Defendants.

**LAS VEGAS SANDS CORP.'S SEVENTH
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS
(Nos. 1-24)**

24
25 AND ALL RELATED MATTERS.
26

27 ///

28 ///

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 Las Vegas Sands Corp. ("LVSC") hereby responds and objects to Plaintiff
5 Steven C. Jacobs' ("Plaintiff") First Request For Production Of Documents to Las Vegas Sands
6 Corp. ("Requests") as follows:

7 **PRELIMINARY STATEMENT**

8 1. LVSC'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 LVSC 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.

27 **GENERAL OBJECTIONS**

28 1. LVSC objects to the Requests to the extent that they purport to impose obligations

1 upon LVSC greater than those contemplated in Rule 26(b) of the Nevada Rules of Civil
2 Procedure.

3 2. LVSC objects to the Requests to the extent that they seek the identification and/or
4 production of documents not in its possession, custody or control.

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

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

11 5. LVSC objects to the terms "You and/or Yours" as defined in the Requests, on the
12 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
13 without limitation, the inclusion of "any other affiliated entities, as well as owners, shareholders,
14 officers, employees, attorneys, accountants, agents, investigators, and/or anyone else acting on its
15 behalf and/or its direction and instruction."

16 6. LVSC objects to the term "Sands China" as defined in the Requests, on the
17 grounds that it is vague, ambiguous, overbroad, and unintelligible as worded, including without
18 limitation, the inclusion of "any of [SCL's] pre-incorporation, pre-spin-off, pre-IPO entities" and
19 "and/or anyone else acting on its own behalf and/or its direction and instruction" within the
20 definition. LVSC will construe the term "Sands China" or "SCL" to mean LVSC's subsidiary,
21 Sands China Limited.

22 7. LVSC objects to the terms "Parcels 5 and 6" as defined for the Requests, on the
23 grounds that they are vague, ambiguous, overbroad, and unintelligible as worded, including
24 without limitation, the inclusion of "parcels of property owned by Sands China located on the
25 Cotai Strip" within the definition.

26 8. LVSC objects to all the Requests to the extent that they assume a disputed legal
27 conclusion, namely, that LVSC and/or its employees acted as agents for SCL in conducting
28 business activities in Nevada. LVSC disputes that it or its employees acted as SCL's agent in

1 Nevada. To the extent that it produces documents in response to these Requests, LVSC does not
2 thereby admit that any agency relationship exists between LVSC and SCL.

3 9. LVSC objects to the extent that the Requests call for the disclosure of confidential,
4 personal, or proprietary business information, including without limitation, (i) confidential
5 information protected by contractual confidentiality obligations, (ii) confidential information
6 protected by rights of privacy held by SCL and/or other third parties, and (iii) personal
7 information protected from disclosure under Macau law. Such confidential, personal, or
8 proprietary business information will be produced pursuant to a protective order to be entered
9 among the parties and/or ordered by the Court.

10 10. LVSC further objects to each and every definition and instruction in the Requests
11 to the extent that it attempts or purports to impose obligations exceeding those authorized and
12 imposed by the Nevada Rules of Civil Procedure.

13 11. By responding to these Requests, LVSC does not in any way waive any rights or
14 objections, including but not limited to LVSC's objections to participation in this jurisdictional
15 discovery notwithstanding the Nevada Supreme Court's August 26, 2011 Writ of Mandamus and
16 stay of this litigation until the adjudication of the issue of whether the District Court holds
17 personal jurisdiction as to SCL.

18 Without waiving these General Objections, LVSC responds to the Requests as follows:

19 **RESPONSES**

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

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

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

27 LVSC incorporates the Preliminary Statement and each of the General Objections as
28 though fully set forth herein.

1 LVSC 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 Subject to and without waiver of the foregoing objections (including the Preliminary
5 Statement and General Objections), please refer to the documents produced by LVSC Bates
6 labeled as: LVS00144910; LVS00144912; LVS00144913; LVS00144914; LVS00144915;
7 LVS00144916; LVS00144917; LVS00144918; LVS00144920; LVS00144938; LVS00144940;
8 LVS00144941; LVS00144943; LVS00144945; LVS00145002; LVS00145024; LVS00145078;
9 LVS00145082; LVS00145087; LVS00145089; LVS00145093; LVS00145095; LVS00145099;
10 LVS00145101; LVS00145103; LVS00145105; LVS00145109; LVS00145110; LVS00145112;
11 LVS00145114; LVS00145118; LVS00145125; LVS00145127; LVS00145129; LVS00145134;
12 LVS00145140; LVS00145142; LVS00145152; LVS00145154; LVS00145155; LVS00145156;
13 LVS00145157; LVS00145194-LVS00145196; LVS00145197-LVS00145198; LVS00145199-
14 LVS00145200; LVS00145288-LVS00145290; LVS00145291-LVS00145293; LVS00145476-
15 LVS00145477; LVS00145539-LVS00145597; LVS00146314-LVS00146315; LVS00146377-
16 LVS00146435; LVS00147010-LVS00147010; LVS00148811-LVS00148811; LVS00148812-
17 LVS00148870; LVS00150037-LVS00150038; LVS00153956-LVS00153958; LVS00154020-
18 LVS00154078; LVS00154108-LVS00154110; LVS00154111-LVS00154169; LVS00154270-
19 LVS00154277; LVS00154278-LVS00154286; LVS00154287-LVS00154294; LVS00155244;
20 LVS00155524; LVS00155586-LVS00155644; LVS00155678; LVS00155679-LVS00155737;
21 LVS00155841; LVS00155943-LVS00155976; LVS00156070-LVS00156074; LVS00157399;
22 LVS00157400; LVS00157401; LVS00157402; LVS00157403; LVS00157404; LVS00158009-
23 LVS00158010; LVS00158028; LVS00158029-LVS00158030; LVS00158032-LVS00158046;
24 LVS00158047-LVS00158048; LVS00158049; LVS00158508-LVS00158521; LVS00158533-
25 LVS00158546; LVS00158555-LVS00158574; LVS00158582-LVS00158583; LVS00158584-
26 LVS00158607; LVS00161927-LVS00161930; LVS00161931-LVS00161934; LVS00173583-
27 LVS00173584; LVS00173586; LVS00173587-LVS00173588; LVS00173589; LVS00173590-
28 LVS00173601; LVS00173607-LVS00173618; LVS00173620; LVS00173621-LVS00173622;

1 LVS00173623-LVS00173627; LVS00173628-LVS00173822; LVS00173824-LVS00173840;
2 LVS00173848; LVS00173850-LVS00173852; LVS00173853; LVS00173854-LVS00173855;
3 LVS00173870-LVS00173871; LVS00174359; LVS00174360-LVS00174361; LVS00174376-
4 LVS00174377; LVS00174865-LVS00174866; LVS00174881-LVS00174882; LVS00175374-
5 LVS00175375; LVS00175378-LVS00175379; LVS00175476-LVS00175477; LVS00175478-
6 LVS00175500; LVS00175507-LVS00175508; LVS00175509-LVS00175532; LVS00175584-
7 LVS00175585; LVS00175630-LVS00175643; LVS00175746-LVS00175751; LVS00175755;
8 LVS00176609-LVS00176620; LVS00176628-LVS00176641; LVS00176715; LVS00176817-
9 LVS00176850; LVS00177573; LVS00178000; LVS00178102-LVS00178135; LVS00178237;
10 LVS00178238-LVS00178239; LVS00178240-LVS00178241; LVS00178242-LVS00178243;
11 LVS00178244-LVS00178245; LVS00178246-LVS00178247; LVS00178248-LVS00178249;
12 LVS00178251-LVS00178265; LVS00178267-LVS00178349; LVS00178575-LVS00178576;
13 LVS00178591-LVS00178592; LVS00179206-LVS00179207; LVS00179208; LVS00179254-
14 LVS00179255; LVS00179256; LVS00179443-LVS00179444; LVS00179445; LVS00179446;
15 LVS00179456-LVS00179457; LVS00179458; LVS00179463; LVS00179476; LVS00179504-
16 LVS00179505; LVS00179507-LVS00179508; LVS00179509; LVS00179510-LVS00179521;
17 LVS00179522-LVS00179533; LVS00179537; LVS00179538-LVS00179546; LVS00179547-
18 LVS00179548; LVS00179863-LVS00179870; LVS00179871-LVS00179872; LVS00179888-
19 LVS00179890; LVS00179912-LVS00179913; LVS00179914-LVS00180070; LVS00183646-
20 LVS00183647; LVS00186898-LVS00186921; LVS00186922-LVS00186936; LVS00186954-
21 LVS00186954; LVS00187056-LVS00187089; LVS00187092; LVS00187093-LVS00187094;
22 LVS00187096-LVS00187110; LVS00187111; LVS00187112-LVS00187113; LVS00187114-
23 LVS00187115; LVS00187130-LVS00187131; LVS00191887; LVS00191888; LVS00191889;
24 LVS00191890; LVS00191891; LVS00191892; LVS00194966-LVS00194967; LVS00195017-
25 LVS00195018; LVS00195019-LVS00195020; LVS00195500; LVS00196404; LVS00196699;
26 LVS00196700-LVS00196701; LVS00196831-LVS00196832; LVS00196836-LVS00196849;
27 LVS00197093-LVS00197098; LVS00199710; LVS00200145; LVS00200146-LVS00200147;
28 LVS00200148-LVS00200149; LVS00200150-LVS00200151; LVS00200152-LVS00200153;

LVS00200154-LVS00200155; LVS00200157-LVS00200171; LVS00200174-LVS00200175;
LVS00200190-LVS00200191; LVS00200970-LVS00200971; LVS00200972-LVS00200974;
LVS00200975-LVS00200976; LVS00200977-LVS00200978; LVS00200979-LVS00200980;
LVS00200981-LVS00200983; LVS00200984-LVS00200986; LVS00200987-LVS00200988;
LVS00200989; LVS00200991; LVS00200992; LVS00200993; LVS00200994; LVS00200995;
LVS00201075-LVS00201076; LVS00201077; LVS00201133-LVS00201134; LVS00201135;
LVS00201387-LVS00201388; LVS00201389; LVS00201390; LVS00201400-LVS00201401;
LVS00201402; LVS00201411; LVS00201436; LVS00201491-LVS00201492; LVS00201494-
LVS00201495; LVS00201496; LVS00201497-LVS00201508; LVS00201509-LVS00201520;
LVS00201524; LVS00201525-LVS00201533; LVS00201534-LVS00201534; LVS00201568-
LVS00201569; LVS00201570-LVS00201572; LVS00201573-LVS00201575; LVS00201588-
LVS00201591; LVS00201592-LVS00201594; LVS00201611-LVS00201613; LVS00201620;
LVS00201621-LVS00201626; LVS00201709-LVS00201710; LVS00201711-LVS00201712;
LVS00201713-LVS00201714; LVS00201715-LVS00201717; LVS00201718-LVS00201722;
LVS00201723-LVS00201727; LVS00201728-LVS00201732; LVS00201733-LVS00201737;
LVS00201738-LVS00201739; LVS00201741-LVS00201742; LVS00201743-LVS00201899;
LVS00203289-LVS00203300; LVS00203446-LVS00203528; LVS00204240-LVS00204322;
LVS00204549-LVS00204631.

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:

LVSC incorporates the Preliminary Statement and each of the General Objections as though fully set forth herein.

LVSC 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 General Objections), please refer to the documents produced by LVSC Bates
5 labeled as: LVS00145633-LVS00145635; LVS00145636-LVS00145637; LVS00145638;
6 LVS00145639-LVS00145644; LVS00145872-LVS00145873; LVS00145874-LVS00145879;
7 LVS00145880; LVS00145881-LVS00145886; LVS00145888-LVS00145892; LVS00145894-
8 LVS00145895; LVS00154263; LVS00154264-LVS00154269; LVS00154817; LVS00155341-
9 LVS00155343; LVS00156143-LVS00156145; LVS00158706; LVS00187090-LVS00187091;
10 LVS00194802-LVS00194803; LVS00194804-LVS00194807; LVS00195501; LVS00196999-
11 LVS00197000; LVS00197092; LVS00197099-LVS00197100; LVS00200137; LVS00201905-
12 LVS00201906.

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

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

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

19 LVSC incorporates the Preliminary Statement and each of the General Objections as
20 though fully set forth herein.

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

24 Subject to and without waiver of the foregoing objections (including the Preliminary
25 Statement and General Objections), please refer to the documents produced by LVSC Bates
26 labeled as: LVS00144162; LVS00144353-LVS00144360; LVS00144606; LVS00144774-
27 LVS00144789; LVS00144910; LVS00144911; LVS00144912; LVS00144913; LVS00144914;
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