

IN THE SUPREME COURT OF THE STATE OF NEVADA

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Tracie K. Lindeman
Clerk of Supreme Court

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.

Case Number: 68275

District Court Case Number:
A627691-B

**REPLY IN SUPPORT OF
EMERGENCY MOTION TO
STAY UNDER NRAP 27(e)—
IMMEDIATE RELIEF
REQUIRED**

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Sands China Ltd.

Please be advised that Mr. Turnbull has informed Sands China Ltd. ("SCL") that he will not appear for a deposition outside of Hong Kong, notwithstanding SCL's request for him to do so. He remains willing to be deposed in person or by video in Hong Kong on reasonable notice, as SCL has informed the plaintiff and reiterates by this reply. Nevertheless, this Emergency Motion to Stay should be granted because SCL remains subject to sanctions unless the Motion is granted.

The plaintiff's opposition to the Emergency Motion in no way lessens the need for immediate relief, nor does it do more than introduce disputes of fact that this Court should not be concerned with. SCL continues to contend, with the support of law throughout the U.S., that the district court abused its discretion when, without good cause, it ordered SCL to produce Mr. Turnbull for deposition in Hawaii.

MORRIS LAW GROUP

By: /s/ STEVE MORRIS

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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 **REPLY IN SUPPORT OF EMERGENCY MOTION TO STAY UNDER NRAP 27(e)—IMMEDIATE RELIEF REQUIRED** to be hand-served and electronically served on the date and to the addressee(s) shown below:

VIA HAND DELIVERY

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

Respondent

VIA ELECTRONIC SERVICE

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DATED this 23rd day of June, 2015.

By: /s/ PATRICIA FERRUGIA