

PISANELLI BICE PLLC  
400 SOUTH 7TH STREET, SUITE 300  
LAS VEGAS, NEVADA 89101

IN THE SUPREME COURT OF THE STATE OF NEVADA

\*\*\*\*\*

SANDS CHINA LTD., A Cayman Islands corporation,  
  
Petitioner,  
  
v.  
  
CLARK COUNTY DISTRICT COURT, THE HONORABLE ELIZABETH GONZALEZ, DISTRICT JUDGE, DEPT. 11,  
  
Respondents,  
  
and  
  
STEVEN C. JACOBS,  
  
Real Party in Interest.

Case No.: 68265 Electronically Filed  
Aug 19 2015 04:24 p.m.  
(Consolidated with Case Numbers 68275 and 68309) Jacie K. Lindeman  
Clerk of Supreme Court

MOTION TO SUPPLEMENT  
RECORD WITH  
NEWLY-PRODUCED EVIDENCE

Real Party in Interest Steven C. Jacobs ("Jacobs") moves, pursuant to NRAP 27, to supplement the record in Case No. 68265 with recently-produced evidence from Petitioner Sands China, Ltd. ("Sands China") which contradicts one of its core representations as to the discovery sanctions the District Court imposed. In its Reply Brief to this Court, Sands China represents that the "Macanese government *required* it to redact all personal data from documents" that its own reviewers determined were responsive to jurisdictional discovery. (Pet. Reply at p. 22) (emphasis in original). Sands China went so far as to proclaim this as an "unchallenged" point. *Id.* With those representations, Sands China asserts that it is improper for the District Court to sanction it for the redactions – which effectively rendered the documents useless – since a sovereign foreign government supposedly mandated them.

But Sands China's recent productions in discovery prove otherwise. The Macau government's instructions were only that personal data could not be produced without complying with the Macau Personal Data Privacy Act

1 ("MPDPA"), and one way of doing so is to obtain the consent of the named  
2 individuals. As the District Court found, Sands China had repeatedly made  
3 representations as to how Macau law did not allow it to obtain those consents and  
4 thus it could not comply with the requirements of the Macanese government in  
5 order to produce unredacted documents. (14 PA 43802 at ¶ 49.) Even without the  
6 benefit of recent revelations, the District Court noted that the claimed inability to  
7 obtain consents conflicts with Sands China's own conduct in responding to the  
8 United States government's subpoena issued to its parent, Las Vegas Sands Corp.  
9 ("LVSC"). (14 PA 43803 at ¶ 50.)

10 But Sands China's recent revelations in discovery confirm that it could indeed  
11 obtain MPDPA consents, contrary to its past assertions. Rather, Sands China  
12 simply elected not to obtain any consents so as to frustrate the District Court's  
13 discovery orders and the sanctions it imposed for Sands China and LVSC having  
14 deceived it as to their access to discoverable evidence. Sands China has now  
15 admitted that it can obtain consents in Macau to produce documents. In fact,  
16 according to Sands China, it has obtained nearly two dozen such consents – and is  
17 in the process of obtaining even more. Copies of those recently-produced consents  
18 are attached to this Motion as Exhibit A.

19 Sands China's representation that the Macau government "required" it to  
20 redact all personal data was untrue when made to the District Court nearly three  
21 years ago, and is still untrue today. Sands China could have complied with the  
22 District Court's order. It simply did not want to do so for its own strategic reasons,  
23 as the District Court noted, even before these recent revelations came to light.

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1 Because Sands China has now produced these consents, Jacobs moves to  
2 supplement the record for Petition No. 68265. *See First Alabama Bank v. Parsons*  
3 *Steel, Inc.*, 825 F.2d 1475, 1487 (11th Cir. 1987) ("This court has the discretionary  
4 power to supplement the record on appeal, even to include evidence not reviewed  
5 by the court below.").

6 DATED this 19th day of August, 2015.

7 PISANELLI BICE PLLC

8 By: /s/ Todd L. Bice

9 James J. Pisanelli, Esq., Bar No. 4027  
10 Todd L. Bice, Esq., Bar No. 4534  
11 Debra L. Spinelli, Esq., Bar No. 9695  
12 Jordan T. Smith, Esq., Bar No. 12097  
13 400 South 7th Street, Suite 300  
14 Las Vegas, Nevada 89101

15 Attorneys for Real Party in Interest  
16 Steven C. Jacobs  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of PISANELLI BICE PLLC and that, on this 19th day of August, 2015, I electronically filed and served a true and correct copy of the above and foregoing **MOTION TO SUPPLEMENT RECORD WITH NEWLY-PRODUCED EVIDENCE** to the following:

J. Stephen Peek, Esq.  
Robert J. Cassity, Esq.  
HOLLAND & HART LLP  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
and  
J. Randall Jones, Esq.  
Mark M. Jones, Esq.  
KEMP, JONES & COULTHARD, LLP  
3800 Howard Hughes Parkway, 17th Floor  
Las Vegas, NV 89169  
and  
Steve Morris, Esq.  
Rosa Solis-Rainey, Esq.  
MORRIS LAW GROUP  
300 South Fourth Street, Suite 900  
Las Vegas, NV 89101  
and  
Alan M. Dershowitz  
(*pro hac vice in process*)  
1575 Massachusetts Avenue  
Cambridge, MA 02138  
*Attorneys for Petitioner, Sands China Ltd.*  
  
The Honorable Elizabeth Gonzalez  
Eighth Judicial District court, Dept. XI  
Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155  
*Respondent*

/s/ Kimberly Peets  
An employee of PISANELLI BICE PLLC

# **EXHIBIT A**

**CONSENT FOR TRANSFER OF PERSONAL DATA**

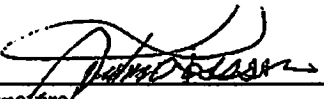
I hereby authorize Venetian Macau Limited ("VML") to process, disclose and transfer my personal data under its control or custody, namely my name, professional contact information, such as email address and telephone number, emails related with VML or any of its Affiliates<sup>1</sup>, to Las Vegas Sands Corp. ("LVSC").

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Notwithstanding my consent, the disclosure and communication of the above mentioned records and emails to Las Vegas Sands Corp. and the Data Recipients shall at all times be subject to the laws of Macau.

I declare that I have been given the opportunity to make due enquiry as to my rights under Macau law.

  
Signature: \_\_\_\_\_

ANTONIO FERREIRA  
Name: \_\_\_\_\_

MACAU, July 6, 2015  
Place and date: \_\_\_\_\_

<sup>1</sup> Affiliates being any person or entity directly or indirectly controlling, controlled or under direct or indirect common control of VML.

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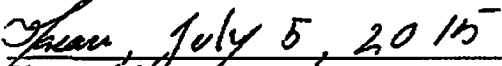
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Signature: \_\_\_\_\_

ANTONIO RAMIREZ  
Name: \_\_\_\_\_

  
Place and date: \_\_\_\_\_

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Signature: \_\_\_\_\_

Ben To  
Name: \_\_\_\_\_

Macao 6/July/2015.  
Place and date: \_\_\_\_\_

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Signature: \_\_\_\_\_

Dave Sun  
Name: \_\_\_\_\_

Macau, July 7, 2015  
Place and date: \_\_\_\_\_

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Signature: \_\_\_\_\_  
DAVID SYLVESTER  
Name: \_\_\_\_\_  
MACAU 14-07-2015  
Place and date: \_\_\_\_\_

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Signature:

Dylan Williams  
Name:

MACAO JULY 3, 2015  
Place and date:

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\_\_\_\_\_  
Signature:

\_\_\_\_\_  
Name: CHAN POU WAN, FBNA

\_\_\_\_\_  
Place and date: Macau 8<sup>th</sup> July 2015

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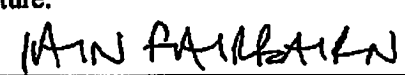
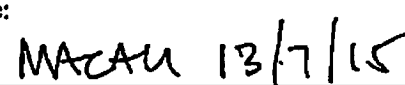
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\_\_\_\_\_  
Signature:  
  
\_\_\_\_\_  
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Place and date:

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 Mark McWhinnie  
Signature: \_\_\_\_\_

MARK. MCWHINNE  
Name: \_\_\_\_\_

MACAU, 3 JULY 2015  
Place and date: \_\_\_\_\_

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Signature: \_\_\_\_\_

  
Michael Gebhard

Name: \_\_\_\_\_

MACAU

10 JUL 2015

Place and date: \_\_\_\_\_

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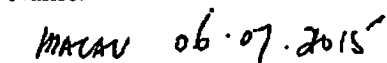
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Name:



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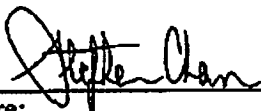
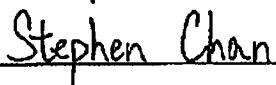
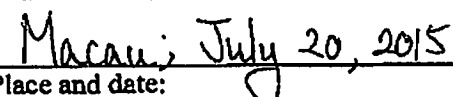
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Name: \_\_\_\_\_  
  
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Signature:

VANESSA ALEXANDRA DA DOREC  
Name:

Macau, 7 July 2015  
Place and date:

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**CONSENT FOR TRANSFER OF PERSONAL DATA**

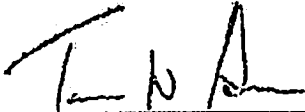
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I declare that I have been given the opportunity to make due enquiry as to my rights under Macau law.



Signature:

Jason Ader

Name:

1370 Avenue of the Americas, 28<sup>th</sup> Floor

New York, NY 10019

8/03/2015

Place and date:

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Signature:

Irwin Chafetz

Name:

Place and date:

8/3/15

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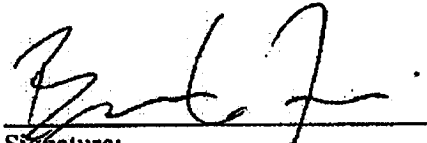
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Signature: \_\_\_\_\_

Bryan Frei  
Name: \_\_\_\_\_

Las Vegas, NV  
Place and date: 7/31/2015

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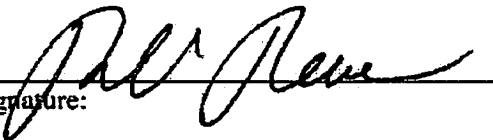
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Signature:

Ron Reese

Name:

Las Vegas, NV

Place and date:

7-31-15

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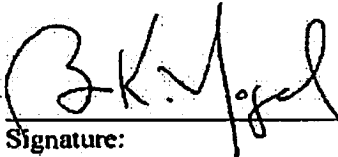
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Signature:

Brian Nagel  
Name:

Las Vegas, NV      8/3/15  
Place and date:

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Signature: \_\_\_\_\_

Andrew Macdonald \_\_\_\_\_

Name: \_\_\_\_\_

Singapore \_\_\_\_\_

Place and date: \_\_\_\_\_

04 AUG 2015

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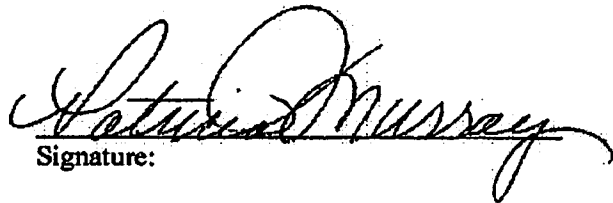
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Signature:

Patricia Murray

Name:

Las Vegas, NV

Place and date:

- 8/3/15

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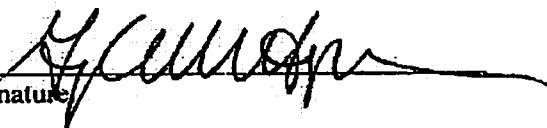
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Signature

Gayle Hyman  
Name:

Las Vegas, NV August 3 2015  
Place and date:

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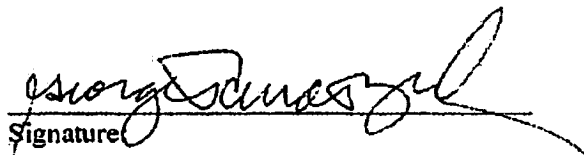
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Signature

George Tanasijevich

Name:

Singapore

Place and date:

2 AUG 15

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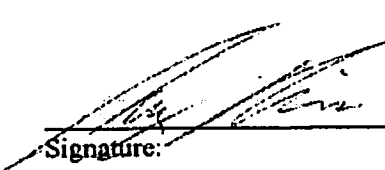
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Signature: \_\_\_\_\_

Larry Chiu  
Name: \_\_\_\_\_

  
Place and date: \_\_\_\_\_

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