



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

**CERTIFICATE OF SERVICE**

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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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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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Signature:

ANTONIO RAMIREZ

Name:

Macau, July 5, 2015

Place and date:

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

Ben Toh.  
\_\_\_\_\_  
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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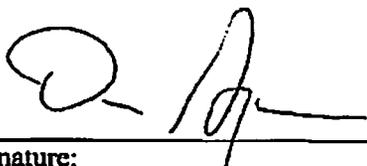
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Signature:

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:

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

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

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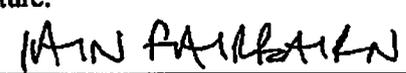
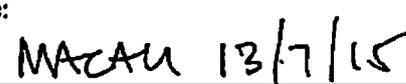
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Signature: \_\_\_\_\_

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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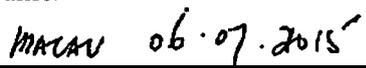
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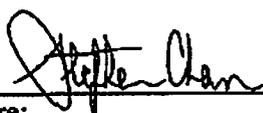
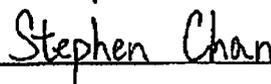
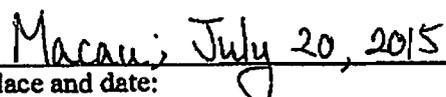
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Vanessa Dorec  
Signature:

VANESSA JOCEFINA DA DOREC  
Name:

Macau, 7 July 2015  
Place and date:

---

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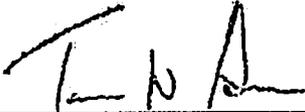
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Signature:

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: \_\_\_\_\_

\_\_\_\_\_ 8/3/15  
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.

**CONSENT FOR TRANSFER OF PERSONAL DATA**

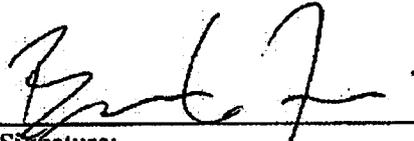
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I hereby also acknowledge and consent to the communication of the above information to: (1) Plaintiff Steven C. Jacobs and his counsel and any additional personnel working at their direction; (2) Defendants Las Vegas Sands Corp., Sands China Ltd. and Sheldon G. Adelson and their counsel and any additional personnel working at their direction; and (3) the Nevada Court in the United States of America (the "Data Recipients") in connection with the matter of *Steven C. Jacobs v. Las Vegas Sands Corp., et al.*, Case No. A-10-627691-B (Clark Co., Nev.), which is currently pending in the Nevada District Court if determined to be required by law.

At any time, I have the right to view my personal data, request additional information about its storage and processing, require any necessary amendments or refuse or withdraw the consent herein, in any case without cost.

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:

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

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

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Signature: 

Ron Reese  
Name:

Las Vegas, NV      7-31-15  
Place and date:

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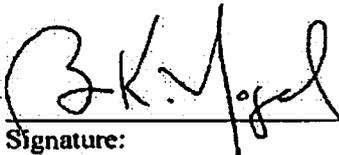
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\_\_\_\_\_  
Signature:

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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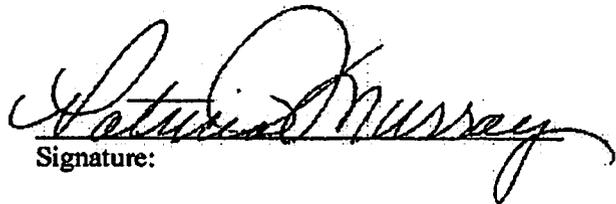
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Signature:

Patricia Murray

Name:

Las Vegas, NV

Place and date:

- 8/3/15

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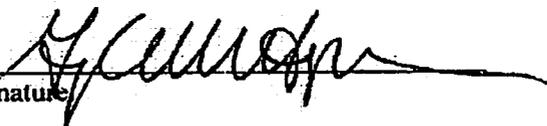
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Signature

Gayle Hyman  
Name:

Las Vegas, NV  
Place and date: August 3 2015

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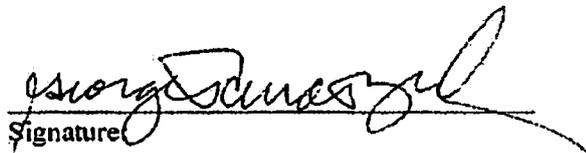
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Signature

George Tanasijevich  
Name:

Singapore  
Place and date: 2 AUG 15

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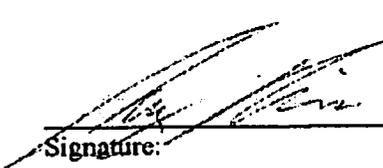
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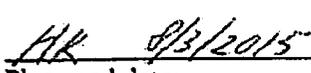
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\_\_\_\_\_  
Signature:

Larry Chiu

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

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

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