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07-13-07A08:39 RCVD

Wanda Cole
Tribal Court Clerk

ST. REGIS MOHAWK TRIBAL COURT

MARLENE ARQUETTE, DICK PETERS,
BENNETTE WHITE, LOUIS GRAY, ROY
TARBELL, DAVID LAZORE, TROY
LAZORE, HENRY GIBSON, MATT
DAVID, RANDY CONNORS, PATTY
LAZORE MANCUSO, NOEL WHITE,
CAROLYN TARBELL, ELLENE HERNE,
GLENN HILL SR., BARBARA LAZORE,
PHIL TARBELL, KERNEY COLE, MARY
DIANNE LAZORE, RUSSELL LAZORE,
JOANNE KING, RENA SMOKE, CHARLIE
TERRANCE, ERMA WHITE MOORE,
LOIS THOMAS, AND CAROL HERNE, On
Behalf of Themselves and All Others
Similarly Situated,

Case No.: 00-CI-0133GN

ORDER

Hon. Wes Williams Jr.

Plaintiffs-Judgment Creditors,

v.

PARK PLACE ENTERTAINMENT
CORPORATION and CLIVE CUMMIS,

Defendants-Judgment Debtors.

WHEREAS, on or about April 26, 2000, twenty-six enrolled members of the St. Regis Mohawk Tribe, on behalf of themselves and all others similarly situated (hereinafter collectively "Plaintiffs" or "the Plaintiff Class"), commenced an action in this Court against, among others, Park Place Entertainment Corporation (hereinafter "Park Place") and its former General Counsel, Clive Cummis.

WHEREAS, the original complaint was served on Defendants in May 2000. On May 12, 2000, Defendants' counsel of record, Dennis J. Block, Esq., submitted an application to the St. Regis Mohawk Tribal Court Bar Association to be admitted to practice before this Court. Defendants' attorney agreed to submit to this Court's jurisdiction and contempt powers and swore an oath to uphold the Tribe's laws. On June 1, 2000, Defendants' attorney entered a

1 personal appearance on their behalf by filing a motion to dismiss the class action complaint,
2 invoking this Court's jurisdiction and seeking a dismissal on the merits, in addition to contending
3 that this Court was "an invalid judicial forum" without authority and power to act. Shortly
4 thereafter, and before Plaintiffs had time to respond to Defendants' motion to dismiss,
5 Defendants abandoned their defense of the action and, on June 2, 2000, filed an action in the
6 United States District Court for the Northern District of New York seeking to enjoin this Court's
7 proceedings. On September 18, 2000, the United States District Court dismissed Defendants'
8 action, holding that it lacked subject matter jurisdiction to determine whether this Court was a
9 valid tribal forum. The United States District Court further concluded that the underlying dispute
10 in the Tribal Court litigation appeared to be "of the type where jurisdiction in a Tribal Court
11 would generally be proper." Thereafter, on September 30, 2000, an Amended Complaint was
12 filed in the Tribal Court action, adding Defendants Paul Thompson, Hilda Smoke, and Alma
13 Ransom as named Defendants against whom declaratory relief was sought. As a result of the
14 filing of the Amended Complaint, this Court subsequently dismissed Defendants' motion to
15 dismiss.

16 WHEREAS, Defendants thereafter wholly abandoned their defense of the class action,
17 failing to answer the Amended Complaint and failing to appear at the ensuing hearing on
18 Plaintiffs' motion for an entry of default.

19 WHEREAS, by order dated January 31, 2001, this Court issued an entry of default
20 against Defendants.

21 WHEREAS, by order dated March 8, 2001, this Court determined that the "applicable
22 law for the suit regarding the maintenance of a class action" is CPLR article 9 and that "St. Regis
23 Mohawk Tribal law will govern all other issues."

24 WHEREAS, by order dated March 16, 2001, this Court granted Plaintiffs' motion for
25 class certification and defined the class as all enrolled members of the St. Regis Mohawk Tribe.

26 WHEREAS, by order dated March 20, 2001, and upon Defendants' continued neglect to
27 defend the class action, this Court granted Plaintiffs' motion for a default judgment against
28 Defendants; declared the management contract entered into between Park Place and Defendants
Ransom, Smoke and Thompson to be null and void; ordered Defendants Park Place and Clive
Cummis to pay Plaintiffs \$1.782 billion in actual damages; ordered Defendants Park Place and
Clive Cummis to pay Plaintiffs' costs and disbursements; and ordered Defendants Park Place and
Clive Cummis to pay punitive damages in the amount of \$5 million (hereinafter the "Default
Judgment Order").

WHEREAS, due and proper notice of each step of the above proceedings was given to
the defendants in this action;

WHEREAS, Defendants Park Place and Clive Cummis failed to file a timely appeal of
the Default Judgment Order to the St. Regis Mohawk Tribal Court of Appeals.

WHEREAS, in or about January 2004, Park Place changed its name to Caesars

