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4 2300 West Sahara Avenue, Suite 1200
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9 *Attorneys for Nationwide Title Clearing, Inc.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SALMA AGHA-KHAN, MD., an individual,

13 Plaintiff,

14 vs.

15 WELLS FARGO BANK, NA, A US BANK;
16 WELLS FARGO FINANCIAL NATIONAL
17 BANK, A National Banking Association; WELLS
18 FARGO HOME MORTGAGE, a Wells Fargo
19 Bank, NA subsidiary; MORTGAGE
20 ELECTRONIC REGISTRATION SYSTEMS,
21 INC., a Delaware agency/corporation, form
22 unknown; MERSCORP HOLDINGS INC,
23 holding/parent company of MERS INC.; TBI
24 MORTGAGE COMPANY, a mortgage company;
25 GMAC MORTGAGE, LLC FKA GMAC
26 MORTGAGE CORPORATION, a financial
27 lending business; OCWEN FINANCIAL
28 CORPORATION, a financial concern, form
unknown; MARIN CONVEYANCING CORP
AKA MARIN CONVEYANCING
CORPORATION, a lending corporation form
unknown; EXECUTIVE TRUSTEE SERVICES,
LLC, a defunct Delaware company form unknown;
FIRST AMERICAN TITEL COMPANY, a title
agency form unknown; FIRST AMERICAN TITLE
INSURANCE COMPANY, a title Insurance
company form unknown; ROUTH CRABTREE
OLSEN PS, a law firm in California; EDWARD T.
WEBER, an individual and attorney at Routh
Crabree Olsen PS; BRETT P. RYAN, an individual
and attorney at Routh Crabree Olsen PS;
JOHNATHAN J. DAMEN, an individual and
attorney at Routh Crabree Olsen PS; JEFF ROMIG
AKA JEFFREY L. ROMIG, an individual;
PATRICIA J. KRAUSE, an individual;
GREENPOINT MORTGAGE FUNDING, INC., a
mortgage company form unknown;
SERVICELINK AKA SERVICELINK, LLC a

Case No.: 2:16-cv-02928-APG-PAL

**NATIONWIDE TITLE CLEARING
INC.'S EX PARTE MOTION TO
EXTEND DEADLINE TO ANSWER
OR OTHERWISE RESPOND TO
COMPLAINT (FIRST REQUEST)**

1 business organization form unknown; LSI TITLE
2 AGENCY INC, a title agency form unknown;
3 CHICAGO TITLE COMPANY, a title company
4 form unknown; FIDELITY NATIONAL
5 DEFAULT SOLUTIONS INC, a company form
6 unknown; NATIONWIDE TITLE CLEARING, a
7 title company form unknown; AMANDA ROSE
8 JONES, an individual and Assistant Secretary for
9 MERS Inc; KRISTOPHER JAMES SANDBERG,
10 a Wells Fargo employee; AND DOES 1
11 THROUGH 1000 INCLUSIVE,

12 Defendants.

13 Pursuant to Local Rule IA 6-1, the Defendant, Nationwide Title Clearing, Inc. (“NTC”)
14 respectfully requests that the Court extend the time for it to answer the Complaint (ECF No. 1)
15 for the reasons set forth below. This Motion is based upon the papers on file, the arguments
16 below and the Declaration of Amanda M. Perach, Esq. (the “Perach Decl.”). This is the first
17 request for an extension of the deadline to answer or otherwise respond to the Complaint.

18 1. On January 3, 2017, general counsel for NTC received the Complaint in Palm
19 Harbor, Florida. Perach Decl. at ¶ 4.

20 2. The Complaint is seventy-five pages long, excluding exhibits, and includes 27
21 listed defendants. (ECF No. 1)

22 3. Upon receiving the Complaint, general counsel endeavored to review the
23 Complaint and following that review, NTC attempted to locate local Nevada counsel to represent
24 it in this litigation. Perach Decl. at ¶ 5.

25 4. NTC eventually requested that McDonald Carano Wilson, LLP serve as its
26 litigation counsel in this action; however due to the substantial amount of parties involved the
27 conflicts review took several days to complete and, therefore, the engagement could not be
28 finalized until January 13, 2017. Perach Decl. at ¶ 6.

1 Thereafter, on the morning of January 20, 2017, after reviewing the lengthy
2 Complaint, NTC’s litigation counsel attempted to contact the Plaintiff, Salma Agha Khan, by
3 telephone to request an extension to answer or otherwise respond to the Complaint. Perach Decl.
4 at ¶ 7. To date, no response has been received. *Id.*

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For these reasons, NTC respectfully requests that the Court set the time for NTC to answer or otherwise respond to the Complaint for February 7, 2017, which is 14 days from the current deadline to respond.

DATED this 23rd day of January, 2017.

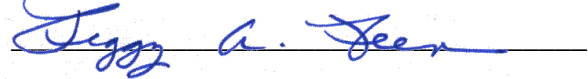
McDONALD CARANO WILSON LLP

By: /s/ Amanda M. Perach

RYAN J. WORKS, ESQ. (NSBN 9224)
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aperach@mcdonaldcarano.com

*Attorneys for Defendant
Nationwide Title Clearing, Inc.*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: _ January 24, 2017

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of McDonald Carano Wilson LLP, and that on the 23rd day of January, 2017, I served a true and correct copy of the foregoing **NATIONWIDE TITLE CLEARING INC.'S EX PARTE MOTION TO EXTEND DEADLINE TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT (FIRST REQUEST)** via the Court's electronic filing system and U.S. Mail, as follows:

Salma Agha-Khan, M.D.
3751 Motor Ave, #34272
Los Angeles, CA 90034
Telephone: (949)332-0330
Email: salmahagha@aol.com

Pro Se Plaintiff

/s/ Marianne Carter
An employee of McDonald Carano Wilson LLP

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1 RYAN J. WORKS, ESQ. (NSBN 9224)
2 AMANDA M. PERACH (NSBN 12399)
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14 vs.

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and attorney at Routh Crabree Olsen PS;
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AKA JEFFREY L. ROMIG, an individual;
PATRICIA J. KRAUSE, an individual;
GREENPOINT MORTGAGE FUNDING, INC., a
mortgage company form unknown;
SERVICELINK AKA SERVICELINK, LLC a

Case No.: 2:16-cv-02928-APG-PAL

**DECLARATION OF AMANDA M.
PERACH, ESQ. IN SUPPORT OF
NATIONWIDE TITLE CLEARING
INC.'S EX PARTE MOTION TO
EXTEND DEADLINE TO ANSWER
OR OTHERWISE RESPOND TO
COMPLAINT (FIRST REQUEST)**

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7 title company form unknown; AMANDA ROSE
8 JONES, an individual and Assistant Secretary for
9 MERS Inc; KRISTOPHER JAMES SANDBERG,
10 a Wells Fargo employee; AND DOES 1
11 THROUGH 1000 INCLUSIVE,

12 Defendants.

13 I, Amanda M. Perach, declare as follows:

14 1. I am over the age of eighteen (18) years. I have personal knowledge of the facts
15 stated within this Declaration. If called as a witness, I would be competent to testify to these
16 facts.

17 2. I am an attorney licensed to practice law in the State of Nevada, an associate with
18 the law firm of McDonald Carano Wilson LLP (“McDonald Carano”), and attorney of record for
19 defendant Nationwide Title Clearing, Inc. (“NTC”) in the action entitled Salma Agha-Khan, MD.
20 v. Wells Fargo Bank, NA, et al., Case No. 2:16-cv-02928-APG-PAL, pending in the United
21 States District Court, District of Nevada (the “Action”).

22 3. This Declaration is submitted in support of NTC’s Motion to Extend Deadline to
23 Answer or Otherwise Respond to Complaint (First Request) (“Motion”) and is made of my own
24 personal knowledge except where stated on information and belief, and as to those matters, I
25 believe them to be true, and I am competent to testify thereto if called upon to do so.

26 4. Upon information and belief, on January 3, 2017, general counsel for NTC
27 received the Complaint in Palm Harbor, Florida.

28 5. Upon further information and belief, upon receiving the Complaint, general
counsel endeavored to review the Complaint and following that review, NTC attempted to locate
local Nevada counsel to represent it in this litigation.

6. NTC eventually requested that McDonald Carano Wilson, LLP serve as its
litigation counsel in this action; however due to the substantial amount of parties involved the

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conflicts review took several days to complete and, therefore, the engagement could not be finalized until January 13, 2017.

7. Thereafter, on the morning of January 20, 2017, after reviewing the lengthy Complaint, I attempted to contact the Plaintiff, Salma Agha Khan, by telephone to request an extension to answer or otherwise respond to the Complaint. To date, no response has been received.

I, Amanda M. Perach, do hereby declare under penalty of perjury that that the foregoing is true and correct.

Executed on: January 23, 2017

/s/ Amanda M. Perach
Amanda M. Perach, Esq.