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 Fidelity National Default Solutions
 6 ServiceLinks, LLC and LSI Title Agency, Inc

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 9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 SALMA AGHA-KHAN, M.D., an individual,) Case No.: 2:16-cv-02928-APG-PAL
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Plaintiff,

vs.

MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

WELLS FARGO BANK, NA, A US BANK;
 WELLS FARGO FINANCIAL NATIONAL BANK,
 A National Banking Association; WELLS FARGO
 HOME MORTGAGE, a Wells Fargo Bank, NA
 subsidiary; MORTGAGE ELECTRONIC
 REGISTRATION SYSTEMS, INC., a Delaware
 agency/corporation, form unknown; MERSCORP
 HOLDINGS INC, holding/parent company of MERS
 INC.; TBI MORTGAGE COMPANY, a mortgage
 company; GMAC MORTGAGE, LLC FKA GMAC
 MORTGAGE CORPORATION, a financial lending
 business; OCWEN FINANCIAL 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
 TITLE 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.)

1 ROMIG, an individual; PATRICIA J. KRAUSE, an)
 individual; GREENPOINT MORTGAGE)
 2 FUNDING, INC., a mortgage company form)
 unknown; SERVICELINK AKA SERVICELINK,)
 3 LLC a business organization form unknown; LSI)
 TITLE AGENCY INC, a title agency form unknown;)
 4 CHICAGO TITLE COMPANY, a title company)
 form unknown; FIDELITY NATIONAL DEFAULT)
 5 SOLUTIONS INC, a company form unknown;)
 NATIONWIDE TITLE CLEARING, a title company)
 6 form unknown; AMANDA ROSE JONES, an)
 individual and Assistant Secretary for MERS Inc;)
 7 KRISTOPHER JAMES SANDBERG, a Wells Fargo)
 employee; AND DOES 1 THROUGH 1000)
 8 INCLUSIVE,)
 9 Defendants.)

MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

11 Pursuant to Federal Rule of Civil Procedure 6(b), Defendants Servicelink AKA
 12 Servicelinks LLC (“SericeLinks”), LSI Title Agency Inc. (“LSI”) and Fidelity National Default
 13 Solutions Inc. (“Fidelity National Default”) (collectively “Moving Defendants” or
 14 “Defendants”) hereby request an order granting additional time, up to and including March 6,
 15 2017, to file a responsive pleading to Plaintiff’s pro per 75 page, 236 paragraph Complaint.
 16 This is the first request for an extension of this deadline.

17 This Motion is based upon the attached points and authorities, the pleadings and papers
 18 on file herein and any arguments of counsel that may be considered at the hearing on this
 19 Motion by the Court.

20 DATED this 30th day of January, 2017.

21 FIDELITY NATIONAL LAW GROUP

22
 23 /s/ Marni Rubin Watkins
 24 Marni Rubin Watkins, Esq.
 25 Nevada Bar No. 9674
 8363 W. Sunset Rd., Ste 120
 26 Las Vegas, NV 89113
 Attorneys for ServiceLink AKA
 27 ServiceLinks LLC, LSI Title Agency, Inc.
 Fidelity National Default Solutions

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2 **POINTS AND AUTHORITIES**

3 Plaintiff commenced this lawsuit on December 16, 2016, by filing her pro per
4 Complaint (ECF No. 1). The Complaint spans 75 pages, asserts 16 causes of action, each of
5 which require a response. The Complaint identifies Moving Defendants, among the 26
6 separate individual and entity defendants named but does not specify the Moving Defendants
7 involvement in the underlying transaction.

8 Counsel was informed regarding this lawsuit while responding to another lawsuit filed
9 by Plaintiff in the United States District Court, District of Nevada, Case No. 2:16-cv-01124-
10 JCM-NJK. It is currently unclear when or even if all of the Moving Defendant have been
11 served. Nonetheless, Moving Defendants do not want to risk having a default entered against
12 them and therefore, by this Motion, all Moving Defendants jointly request an extension of time
13 to respond to the Complaint. Moving Defendants request an answer date of March 6, 2017.
14 This request is being made pursuant to Federal Rules of Civil Procedure 6(b)(1)(A) as the time
15 period to respond to the Complaint has not yet passed for any of the Defendants.

16 Good cause exists to extend the time to respond to the pro per Complaint because (1)
17 Moving Defendants have not yet been served; (2) the Complaint contains 75 pages of pleadings
18 and 16 causes of action; and (3) the Complaint is vague as to the Moving Defendants
19 involvement in the alleged wrongdoing and therefore the research necessary to respond to the
20 236 paragraphs of allegations is extensive. The requested time is needed to investigate the facts
21 and analyze the applicable law in order to prepare a response.

22 Moreover, on December 16, 2016, Plaintiff filed an Adversary Complaint in the U.S
23 Bankruptcy Court, Eastern District of California, Adversary Proceeding #: 16-01107. The
24 Adversary Complaint pleads causes of action related to the Property at issue in this case: 2448
25 Granada Bluff Court, Las Vegas, NV 89135 (the "Property"). Just as with the case here, the
26 allegations contained in the Adversarial Complaint contend that defendants recorded and filed
27 false and/or fraudulent non-judicial foreclosure documents. Moving Defendants need
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1 additional time to determine the impact that the Bankruptcy Case and Adversarial Case have on
2 the instant litigation.

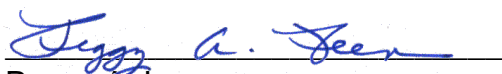
3 **CONCLUSION**

4 For the foregoing reasons, Moving Defendants respectfully request an extension of the
5 time to respond to Plaintiff's Complaint until March 6, 2017.

6 DATED this 30th day of January, 2017. FIDELITY NATIONAL LAW GROUP

7
8 /s/ Marni Rubin Watkins
9 Marni Rubin Watkins, Esq.
10 Nevada Bar No. 9674
11 8363 W. Sunset Road Ste. 120
12 Las Vegas, NV 89113
13 Attorneys for Defendants
14 ServiceLink AKA
15 ServiceLinks LLC, LSI Title Agency, Inc.
16 Fidelity National Default Solutions

14 IT IS SO ORDERED this 2nd day of
15 February, 2017.

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17 Peggy A. Leen
18 United States Magistrate Judge

CERTIFICATE OF SERVICE

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The undersigned employee of Fidelity National Law Group, hereby certifies that she served a copy of the foregoing **MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** upon the following parties on the date below entered (unless otherwise noted), at the fax numbers and/or addresses indicated below by: [X] (i) placing said copy in an envelope, first class postage prepaid, in the United States Mail at Las Vegas, Nevada, [] (ii) via facsimile, [] (iii) via courier/hand delivery, [] (iv) via overnight mail, and/or [] (v) via electronic delivery (email).

Salma Agha-Khan, M.D.
3751 Motor Avenue, #34272
Los Angeles, CA 90034
Plaintiff

Jeffrey L. Romig and Patricia Romig (Krause)
2448 Granada Bluff Court
Las Vegas, NV 89135
Defendants

Megan K. Dorsey, Esq.
KOELLER NEBEKER CARLSON &
HALUCK, LLP.
400 S. Fourth Street, Suite 600
Las Vegas, NV 89101
*Attorneys for Defendants,
TBI Mortgage Company*

DATED: 1/30/2017

/s/ Mia L. Hurtado
An employee of Fidelity National Law Group