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11 Attorneys for Defendant  
 12 COMMONWEALTH LAND TITLE INSURANCE  
 13 COMPANY

14 UNITED STATES DISTRICT COURT  
 15 DISTRICT OF NEVADA

16 WELLS FARGO BANK, N.A.  
 17 SUCCESSOR BY MERGER TO WELSS  
 18 FARGO BANK MINNESOTA, N.A.,  
 19 F/K/A NORWEST BANK MINNESOTA,  
 20 N.A., SOLEY AS TRUSTEE FOR  
 21 STRUCTURED ASSET MORTGAGE  
 22 INVESTMENTS II INC. BEAR STEARNS  
 23 MORTGAGE FUNDING TRUST 2007-  
 24 ARI, MORTGAGE PASS-THROUGH  
 25 CERTIFICATES, SERIES 2007-ARI,

26 Plaintiffs,

27 vs.

28 COMMONWEALTH LAND TITLE  
 29 INSURANCE COMPANY,

30 Defendant.

Case No.: 218-cv-00494-APG-PAL

**STIPULATION AND PROPOSED  
 ORDER EXTENDING DEFENDANT  
 COMMONWEALTH LAND TITLE  
 INSURANCE COMPANY'S TIME TO  
 RESPOND TO FIRST AMENDED  
 COMPLAINT**

**[FIRST REQUEST REGARDING  
 FIRST AMENDED COMPLAINT]**

1 Plaintiff Wells Fargo Bank, N.A. Successor By Merger To Wells Fargo Bank Minnesota,  
2 N.A., f/k/a Norwest Bank Minnesota, N.A., Solely As Trustee For Structured Asset Mortgage  
3 Investments II Inc. Bear Stearns Mortgage Funding Trust 2007-AR1, Mortgage Pass-Through  
4 Certificates, Series 2007-AR1 (“Wells Fargo”), and Defendant Commonwealth Land Title  
5 Insurance Company, (“Commonwealth”), by and through their counsel of record, hereby stipulate  
6 as follows:

7 **WHEREAS**, Wells Fargo filed its original Complaint in this matter on March 20, 2018  
8 [ECF No. 1];

9 **WHEREAS**, the parties stipulated to extend Commonwealth’s time to respond to the  
10 original Complaint to May 7, 2018 [ECF No. 9];

11 **WHEREAS**, on May 7, 2018, Commonwealth filed a Motion to Dismiss Wells Fargo’s  
12 original Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure [ECF No. 10];

13 **WHEREAS**, the parties stipulated to extend Wells Fargo’s time to respond to  
14 Commonwealth’s Motion to Dismiss to May 29, 2018 [ECF No. 15];

15 **WHEREAS**, on May 29, 2018, Wells Fargo filed a First Amended Complaint in this matter  
16 [ECF No. 16];

17 **WHEREAS**, on June 1, 2018, the Court entered an Order denying Commonwealth’s  
18 Motion to Dismiss the original Complaint as moot [ECF No. 17];

19 **WHEREAS**, Commonwealth’s response to the First Amended Complaint is currently due  
20 on June 12, 2018;

21 **WHEREAS**, Wells Fargo has agreed (1) to extend Commonwealth’s time to respond to the  
22 First Amended Complaint to June 19, 2018, and (2) if Commonwealth files a Motion to Dismiss  
23 the First Amended Complaint on or before that date, to extend Commonwealth’s deadline to file an  
24 Answer to the First Amended Complaint until 14 days after the Court rules on Commonwealth’s  
25 Motion to Dismiss the First Amended Complaint;

26 Now, therefore, the parties hereto, by and through their counsel of record, and subject to  
27 Court approval, hereby stipulate and agree as follows:

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1. Commonwealth shall file its response to Wells Fargo’s First Amended Complaint in this matter on or before June 19, 2018; and
2. If Commonwealth files a Motion to Dismiss the First Amended Complaint, Commonwealth shall file an Answer to the First Amended Complaint within fourteen days of the Court’s ruling on the Motion to Dismiss.

Dated this 7th day of June 2018

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

By: /s/ Kevin S. Sinclair  
Kevin S. Sinclair  
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Las Vegas, Nevada 89101

Attorneys for Defendant  
Commonwealth Land Title Insurance Company

Dated this 7th day of June 2018

WRIGHT, FINLAY & ZAK, LLP

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Attorneys for Plaintiff  
Wells Fargo Bank, N.A. Successor By Merger to  
Wells Fargo Bank Minnesota, N.A., Solely As  
Trustee For Structured Asset Mortgage  
Investments II Inc. Bear Stearns Mortgage Funding  
Trust 2007-ARI, Mortgage Pass-Through Certificates,  
Series 2007-ARI

**IT IS SO ORDERED:**

By:   
UNITED STATES MAGISTRATE JUDGE

Dated: June 12, 2018