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13 *Attorney for Plaintiff, Wells Fargo Bank, N.A., As Trustee For The Certificate Holders Of Park*
14 *Place Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-WCW1*

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 WELLS FARGO BANK, N.A., AS
18 TRUSTEE FOR THE CERTIFICATE
19 HOLDERS OF PARK PLACE SECURITIES,
20 INC., ASSET-BACKED PASS-THROUGH
21 CERTIFICATES, SERIES 2005-WCW1,

22 Plaintiff,

23 vs.

24 COMMONWEALTH LAND TITLE
25 INSURANCE COMPANY,

26 Defendant.

Case No.: 2:19-cv-00803-GMN-EJY

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF NO. 46]**

(First Request)

27 COMES NOW, Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Certificate Holders
28 of Park Place Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-WCW1
29 (“Wells Fargo”) and Defendant, Commonwealth Land Title Insurance Company
30 (“Commonwealth”, collectively, the “Parties”), by and through their respective undersigned
31 counsels, stipulate and agree as follows:

- 32 1. On March 12, 2024, Commonwealth filed a Motion to Dismiss [ECF No. 46];
- 33 2. Wells Fargo’s deadline to respond to Commonwealth’s Motion to Dismiss is currently
34 March 26, 2024;

- 1 3. This is one of five cases pending before this Court in which similar Motions to Dismiss
2 have been filed and with the same deadline for a response¹. Good cause exists for a
3 brief extension as counsel for Wells Fargo reasonably requires additional time to
4 diligently prepare responses given the numerous Motions to Dismiss due at the same
5 time. Wells Fargo requests a two-week extension up to and including April 9, 2024 to
6 file its response to Commonwealth’s Motion to Dismiss;
- 7 4. Counsel for Commonwealth does not oppose the requested extension;
- 8 5. This is the first request for an extension and is made in good faith and not for purposes
9 of undue delay or prejudice.

10 **IT IS SO STIPULATED.**

11 DATED this 25th day of March, 2024.

 DATED this 25th day of March, 2024.

12 WRIGHT, FINLAY & ZAK, LLP

 SINCLAIR BRAUN KARGHER LLP

13
14 /s/ Yanxiong Li, Esq.
15 Yanxiong Li, Esq.
16 Nevada Bar No. 12807
17 7785 W. Sahara Ave., Suite 200
18 Las Vegas, NV 89117
19 Attorneys for Plaintiff, Wells Fargo Bank,
 N.A., As Trustee For The Certificate Holders
 Of Park Place Securities, Inc., Asset-Backed
 Pass-Through Certificates, Series 2005-
 WCW1

/s/ Kevin S. Sinclair, Esq.
 Kevin S. Sinclair, Esq.
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 Attorneys for Defendant, Commonwealth
 Land Title Insurance Company

20
21 **IT IS SO ORDERED.**

22 DATED: March 26, 2024



 DISTRICT COURT JUDGE

23
24
25 _____
26 ¹ The other four cases being *U.S. Bank National Association v. Fidelity National Title Group, Inc., et al*, Case No. 2:21-cv-01454-GMN-NJK; *U.S. Bank, National Association v. Fidelity National Title Insurance Company*, Case No. 2:19-cv-00809-GMN-BNW; *Deutsche Bank National Trust Company v. Fidelity National Title Group, Inc., et al*, Case No. 2:20-cv-01886-GMN-BNW; *Wilmington Trust, National Association v. Commonwealth Land Title Insurance Company*, Case No. 2:18-cv-02023-GMN-BNW.