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13 *Attorney for Plaintiff, U.S. Bank, National Association, Successor Trustee To Bank Of America,*  
 14 *N.A., As Successor Trustee To LaSalle Bank, N.A, As Trustee For The Holders Of The First*  
 15 *Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-FF1*

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

18 U.S. BANK, NATIONAL ASSOCIATION,  
 19 SUCCESSOR TRUSTEE TO BANK OF  
 20 AMERICA, N.A., AS SUCCESSOR  
 21 TRUSTEE TO LASALLE BANK, N.A, AS  
 22 TRUSTEE FOR THE HOLDERS OF THE  
 23 FIRST FRANKLIN MORTGAGE LOAN  
 24 TRUST, MORTGAGE LOAN ASSET-  
 25 BACKED CERTIFICATES, SERIES 2007-  
 26 FF1,

27 Plaintiff,

28 vs.

FIDELITY NATIONAL TITLE  
 INSURANCE COMPANY and LAWYERS  
 TITLE INSURANCE CORPORATION,

Defendants.

Case No.: 2:19-cv-00809-GMN-BNW

**STIPULATION TO EXTEND TIME TO  
 RESPOND TO MOTION TO DISMISS  
 [ECF NO. 53]**

**(First Request)**

23 COMES NOW, Plaintiff, U.S. Bank, National Association, Successor Trustee To Bank  
 24 Of America, N.A., As Successor Trustee To LaSalle Bank, N.A, As Trustee For The Holders Of  
 25 The First Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-  
 26 FF1 (“US Bank”) and Defendant, Fidelity National Title Insurance Company (“Fidelity”,  
 27 collectively, the “Parties”), by and through their respective undersigned counsels, stipulate and  
 28 agree as follows:

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1. On March 12, 2024, Fidelity filed a Motion to Dismiss [ECF Nos. 53];
2. US Bank’s deadline to respond to Fidelity’s Motion to Dismiss is currently March 26, 2024;
3. This is one of five cases pending before this Court in which similar Motions to Dismiss have been filed and with the same deadline for a response<sup>1</sup>. Good cause exists for a brief extension as counsel for US Bank reasonably requires additional time to diligently prepare responses given the numerous Motions to Dismiss due at the same time. US Bank requests a two-week extension up to and including April 9, 2024 to file its response to Fidelity’s Motion to Dismiss;
4. Counsel for Fidelity does not oppose the requested extension;
5. This is the first request for an extension and is made in good faith and not for purposes of undue delay or prejudice.

**IT IS SO STIPULATED.**

DATED this 25 <sup>th</sup> day of March, 2024.	DATED this 25 <sup>th</sup> day of March, 2024.
WRIGHT, FINLAY & ZAK, LLP	SINCLAIR BRAUN KARGER LLP
<u>/s/ Yanxiong Li, Esq.</u> Yanxiong Li, Esq. Nevada Bar No. 12807 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Plaintiff</i>	<u>/s/ Kevin S. Sinclair, Esq.</u> Kevin S. Sinclair, Esq. Nevada Bar No. 12277 15260 Ventura Blvd., Ste 715 Sherman Oaks, California 91403 <i>Attorneys for Defendant</i>

**IT IS SO ORDERED.**

DATED: March 26, 2024

  
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DISTRICT COURT JUDGE

<sup>1</sup> The other four cases being *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance Company*, Case No. 2:19-cv-00803-GMN-EJY; *U.S. Bank National Association v. Fidelity National Title Group, Inc., et al*, Case No. 2:21-cv-01454-GMN-NJK; *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.