

1 WRIGHT, FINLAY & ZAK, LLP

2 Darren T. Brenner, Esq.

3 Nevada Bar No. 8386

4 Lindsay D. Robbins, Esq.

5 Nevada Bar No. 13474

6 7785 W. Sahara Ave., Suite 200

7 Las Vegas, NV 89117

8 (702) 637-2345; Fax: (702) 946-1345

9 lrobbins@wrightlegal.net

10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee, on
11 Behalf of the Holders of the Accredited Mortgage Loan Trust 2006-1 Asset-Backed Notes*

12 **UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST
15 COMPANY, AS INDENTURE TRUSTEE,
16 ON BEHALF OF THE HOLDERS OF THE
17 ACCREDITED MORTGAGE LOAN TRUST
18 2006-1 ASSET-BACKED NOTES,

19 Plaintiff,

20 vs.

21 FIDELITY NATIONAL TITLE GROUP,
22 INC.; FIDELITY NATIONAL TITLE
23 INSURANCE COMPANY; FIDELITY
24 NATIONAL TITLE AGENCY OF NEVADA,
25 INC.; DOE INDIVIDUALS I through X; and
ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 2:20-cv-01920-KJD-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S
OPPOSITION TO COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF No. 35]**

[First Request]

26 Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee, on Behalf of
27 the Holders of the Accredited Mortgage Loan Trust 2006-1 Asset-Backed Notes ("Deutsche
28 Bank"), and Defendant Fidelity National Title Insurance Company ("Fidelity National"), by and
through their counsel of record, hereby stipulate and agree as follows:

1. On October 15, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial
District Court, Case No. A-20-823139-C [ECF No. 1-1];

1 2. On October 15, 2020, Fidelity National filed a Petition for Removal to this Court
2 [ECF No. 1];
3 3. On November 10, 2020, Fidelity National filed a Motion to Dismiss [ECF No. 10];
4 4. On November 24, 2020, Deutsche Bank filed an Opposition to Fidelity National's
5 Motion to Dismiss and Countermotion for Partial Summary Judgment [ECF Nos. 23
6 and 24];
7 5. On December 15, 2020, Fidelity National filed its Reply in Support of its Motion to
8 Dismiss and Opposition to Countermotion for Partial Summary Judgment [ECF No.
9 35];
10 6. Deutsche Bank contends that it is entitled to file a response to Fidelity National's
11 Opposition to its Countermotion for Partial Summary Judgment and that its deadline
12 to do so is December 29, 2020;
13 7. Deutsche Bank's counsel is requesting a fourteen day extension to respond to
14 Fidelity National's Opposition, until January 12, 2021;
15 8. This extension is requested to allow counsel for Deutsche Bank additional time to
16 review and respond to the points and authorities cited to in the pending Opposition;
17 9. Counsel for Fidelity National does not oppose the requested extension to the extent
18 that a response is permitted;

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 10. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 28 th day of December, 2020.	5 DATED this 28 th day of December, 2020.
6 WRIGHT, FINLAY & ZAK, LLP	7 SINCLAIR BRAUN LLP
8 <i>/s/ Lindsay D. Robbins</i> 9 Lindsay D. Robbins, Esq. 10 Nevada Bar No. 13474 11 7785 W. Sahara Ave., Suite 200 12 Las Vegas, NV 89117 13 <i>Attorneys for Plaintiff, Deutsche Bank</i> 14 <i>National Trust Company, as Indenture</i> 15 <i>Trustee, on Behalf of the Holders of the</i> 16 <i>Accredited Mortgage Loan Trust 2006-1</i> 17 <i>Asset-Backed Notes</i>	18 <i>/s/ Sophia S. Lau</i> 19 Kevin S. Sinclair, Esq. 20 Nevada Bar No. 12277 21 16501 Venture Blvd., Suite 400 22 Encino, California 91436 23 <i>Attorneys for Defendants Fidelity National</i> 24 <i>Title Insurance Company and Fidelity</i> 25 <i>National Title Agency of Nevada, Inc. and</i> 26 <i>Specially-Appearing Defendant Fidelity</i> 27 <i>National Title Group, Inc.</i>

13 **IT IS SO ORDERED.**

14 Dated: January 8, 2021 (nunc
15 pro tunc)

16 
17 _____
18 UNITED STATES DISTRICT JUDGE

21
22
23
24
25
26
27
28