

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
 2 *sgizer@earlysullivan.com*
 3 Sophia S. Lau, Esq., Nevada Bar No. 13365
 4 *slau@earlysullivan.com*
 5 EARLY SULLIVAN WRIGHT
 6 GIZER & McRAE LLP
 7 8716 Spanish Ridge Avenue, Suite 105
 8 Las Vegas, Nevada 89148
 9 Telephone: (702) 331-7593
 10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
 12 *ksinclair@sinclairbraun.com*
 13 SINCLAIR BRAUN LLP
 14 16501 Ventura Blvd, Suite 400
 15 Encino, California 91436
 16 Telephone: (213) 429-6100
 17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
 19 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO
 20 TITLE INSURANCE COMPANY, and TICOR TITLE OF
 21 NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
 23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

24 Gary L. Compton, State Bar No. 1652
 25 2950 E. Flamingo Road, Suite L
 26 Las Vegas, Nevada 89121

27 **UNITED STATES DISTRICT COURT**
 28 **DISTRICT OF NEVADA**

29 US BANK NATIONAL ASSOCIATION,
 30
 31 Plaintiff,
 32
 33 vs.
 34 FIDELITY NATIONAL TITLE GROUP,
 35 INC. et al.,
 36
 37 Defendants.

Case No.: 2:20-CV-02239-GMN-VCF

**STIPULATION AND ORDER TO
 EXEND TIME TO REPLY IN
 SUPPORT OF MOTIONS TO DISMISS
 AND OPPOSE COUNTERMOTION
 FOR PARTIAL SUMMARY
 JUDGMENT (ECF Nos. 18-20, 42)**

SECOND REQUEST

38 COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Chicago Title
 39 Insurance Company. (“Chicago Title”) and Ticor Title of Nevada, Inc. (“Ticor Agency”)
 40 (collectively “Defendants”) and plaintiff U.S. Bank, National Association (“U.S. Bank”), by and
 41 through their respective attorneys of record, which hereby agree and stipulate as follows:



1 1. On December 9, 2020, U.S. Bank filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On December 10, 2020, Chicago Title removed the instant case to the United
4 States District Court for the State of Nevada (ECF No. 1);

5 3. On January 25, 2021 FNTG, Chicago Title, and Ticor Agency moved to dismiss
6 U.S. Bank’s complaint (ECF Nos. 18-20);

7 4. On June 11, 2021, U.S. Bank filed its responses to FNTG, Chicago Title, and Ticor
8 Agency’s motions to dismiss (ECF Nos. 39-41) and filed a countermotion for partial summary
9 judgment to Chicago Title’s motion to dismiss (ECF No. 42);

10 5. On June 17, 2021, the Court granted the parties first stipulation extending the time
11 for Defendants to reply in support of their motions to dismiss and for Chicago Title to oppose the
12 countermotion for partial summary judgment to July 16, 2021 (ECF No. 45);

13 6. Defendants request a 31-day extension of their respective deadlines to reply in
14 support of the motions to dismiss and of Chicago Title’s deadline to oppose the countermotion for
15 summary judgment, through and including Monday, August 16, 2021, to afford Defendants’
16 counsel additional time to review and respond to U.S. Bank’s oppositions and countermotion.

17 7. Counsel for U.S Bank does not oppose the requested extension;

18 8. This is the second request for an extension made by counsel for Defendants, which
19 is made in good faith and not for the purposes of delay.

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //



1 **IT IS SO STIPULATED** that Defendants’ respective deadlines to reply in support of
2 their motions to dismiss and oppose U.S. Bank’s countermotion is hereby extended through and
3 including Monday, August 16, 2021.

4 Dated: July 14, 2021

SINCLAIR BRAUN LLP

5

6

By: /s/-Kevin S. Sinclair

7

KEVIN S. SINCLAIR
Attorneys for Defendants
FIDELITY NATIONAL TITLE GROUP,
INC., CHICAGO TITLE INSURANCE
COMPANY, and TICOR TITLE OF
NEVADA, INC.

8

9

10 Dated: July 14, 2021

WRIGHT FINLAY & ZAK, LLP

11

12

By: /s/-Christina V. Miller

13

CHRISTINA V. MILLER
Attorneys for Plaintiff
U.S. BANK, NATIONAL ASSOCIATION

14

15

16

IT IS SO ORDERED.

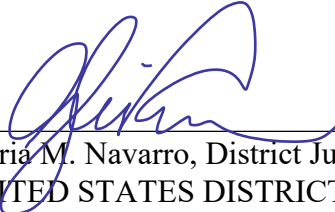
17

18

Dated this 15 day of July, 2021

19

20



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

21

22

23

24

25

26

27

28

