

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

Kevin S. Sinclair, Nevada Bar Number 12277
ksinclair@sinclairbraun.com
SINCLAIR BRAUN LLP
16501 Ventura Boulevard, Suite 400
Encino, California 91436
Telephone: (213) 429-6100
Facsimile: (213) 429-6101

Attorneys for Defendant
CHICAGO TITLE INSURANCE COMPANY

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

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

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

U.S. BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR GREENPOINT
MORTGAGE FUNDING TRUST
MORTGAGE PASSTHROUGH
CERTIFICATES, SERIES 2006-AR6,

Plaintiff.

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00273-JAD-NJK

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND AND
MOTION FOR FEES AND COSTS
[ECF No. 14]**

(Second Request)

[ECF No. 26]

EARLY 28
SULLIVAN
WRIGHT
GIZER &
MCRAE LLP
ATTORNEYS AT LAW

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank National Association (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-829687-C [ECF No. 1-1];
2. On February 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On March 22, 2021, U.S. Bank filed a Motion for Remand and Motion for Costs and Fees [ECF No. 14];
4. Chicago Title’s original deadline to respond to U.S. Bank’s Motion for Remand and Motion for Costs and Fees was April 5, 2021;
5. The Court previously granted Chicago Title’s request to extend the deadline to respond to U.S. Bank’s Motion for Remand and Motion for Fees and Costs to April 26, 2021 [ECF No. 21];
6. Chicago Title’s counsel is requesting an additional extension until May 19, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests another extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in U.S. Bank’s motions;
8. U.S. Bank does not oppose the requested extension;
9. This is the second request for an extension which is made in good faith and not for purposes of delay;

111

24 |||

25 |||

26 || //

27 |||

111

1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand and Motion for Costs and Fees [ECF No. 14] is hereby extended through and
3 including May 19, 2021.

4

5 Dated: April 23, 2021

6 EARLY SULLIVAN WRIGHT
7 GIZER & MCRAE LLP

8 By: /s/-- Sophia S. Lau
9 SCOTT E. GIZER
10 SOPHIA S. LAU
11 Attorneys for Defendant CHICAGO TITLE
12 INSURANCE COMPANY

13

14 Dated: April 23, 2021

15 SINCLAIR BRAUN LLP

16 By: /s/-Kevin S. Sinclair
17 KEVIN S. SINCLAIR
18 Attorneys for Defendant CHICAGO TITLE
19 INSURANCE COMPANY

20

21 Dated: April 23, 2021

22 WRIGHT FINLAY & ZAK, LLP

23 By: /s/-Lindsay D. Robbins
24 LINDSAY D. ROBBINS
25 Attorneys for Plaintiff U.S. BANK
26 NATIONAL ASSOCIATION

27

28 **IT IS SO ORDERED:**

29

30 Dated: April 26, 2021

31 By: 
32 UNITED STATES DISTRICT COURT JUDGE