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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Securitized Asset
11 Backed Receivables LLC Trust 2007-BR3, Mortgage Pass-Through Certificates, Series 2007-
12 BR3*

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

15 DEUTSCHE BANK NATIONAL TRUST
16 COMPANY, as Trustee for SECURITIZED
17 ASSET BACKED RECEIVABLES LLC
18 TRUST 2007-BR3, MORTGAGE PASS-
19 THROUGH CERTIFICATES, SERIES 2007-
20 BR3,

21 Plaintiff,

22 vs.

23 FIDELITY NATIONAL TITLE GROUP,
24 INC.; FIDELITY NATIONAL TITLE
25 INSURANCE COMPANY; LAWYERS
26 TITLE OF NEVADA, INC.; DOE
27 INDIVIDUALS I through X; and ROE
28 CORPORATIONS XI through XX, inclusive,

29 Defendants.

30 Case No.: 2:21-cv-00297-JCM-EJY

31 **STIPULATION AND ORDER TO
32 EXTEND TIME PERIOD TO RESPOND
33 TO MOTIONS TO DISMISS [ECF Nos.
34 9-11]**

35 **[First Request]**

36 Plaintiff, Deutsche Bank National Trust Company, as Trustee for Securitized Asset
37 Backed Receivables LLC Trust 2007-BR3, Mortgage Pass-Through Certificates, Series 2007-
38 BR3 (“Deutsche Bank Trustee”) and Specially-Appearing Defendant Fidelity National Title
39 Group (“FNTG”), Defendant Fidelity National Title Insurance Company (“FNTIC”) and
40 Lawyers Title of Nevada, Inc. (“Lawyers Title”) (collectively the “Defendants”), by and
41 through their counsel of record, hereby stipulate and agree as follows:

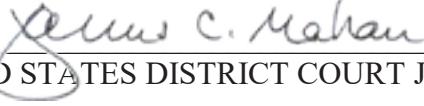
- 1 1. On February 22, 2021, Deutsche Bank Trustee filed its Complaint in Eighth Judicial
2 District Court, Case No. A-21-829841-C [ECF No. 1-1];
3 2. On February 22, 2021, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
4 3. On March 18, 2021, Defendants filed their Motions to Dismiss [ECF Nos. 9-11];
5 4. Deutsche Bank Trustee's deadline to respond to Defendants' Motions to Dismiss is
6 currently April 1, 2021;
7 5. Deutsche Bank Trustee's counsel is requesting an extension until Monday, May 3, 2021,
8 to file its response to the pending Motions to Dismiss;
9 6. This extension is requested to allow counsel for Deutsche Bank Trustee additional time
10 to review and respond to the points and authorities cited to in the pending Motions;
11 7. Counsel for Defendants does not oppose the requested extension;
12 8. This is the first request for an extension which is made in good faith and not for
13 purposes of delay.

14 **IT IS SO STIPULATED.**

DATED this 30 th day of March, 2021. WRIGHT, FINLAY & ZAK, LLP <u>/s/ Lindsay D. Robbins</u> Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Trustee for Securitized Asset Backed Receivables LLC Trust 2007-BR3, Mortgage Pass-Through Certificates, Series 2007-BR3</i>	DATED this 30 th day of March, 2021. SINCLAIR BRAUN LLP <u>/s/ Kevin S. Sinclair</u> Kevin S. Sinclair, Esq. Nevada Bar No. 12277 16501 Ventura Boulevard, Suite 400 Encino, California 91436 <i>Attorney for Defendants, Fidelity National Title Group, Fidelity National Title Insurance Company and Lawyers Title of Nevada, Inc.</i>
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24 **IT IS SO ORDERED.**

25 Dated March 31, 2021.

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28 UNITED STATES DISTRICT COURT JUDGE