

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*

2 Sophia S. Lau, Esq., Nevada Bar No. 13365  
3 *slau@earlysullivan.com*

3 EARLY SULLIVAN WRIGHT  
4 GIZER & McRAE LLP

4 8716 Spanish Ridge Avenue, Suite 105

5 Las Vegas, Nevada 89148

5 Telephone: (702) 331-7593

6 Facsimile: (702) 331-1652

6 Kevin S. Sinclair, NV Bar No. 12277

7 *ksinclair@sinclairbraun.com*

8 SINCLAIR BRAUN LLP

8 16501 Ventura Blvd, Suite 400

9 Encino, California 91436

9 Telephone: (213) 429-6100

10 Facsimile: (213) 429-6101

10 Attorneys for Defendants

11 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO  
12 TITLE INSURANCE COMPANY, INC., and TICOR TITLE OF  
13 NEVADA, INC.,

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

16 Gary L. Compton, State Bar No. 1652  
17 2950 E. Flamingo Road, Suite L  
18 Las Vegas, Nevada 89121

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 US BANK, NATIONAL ASSOCIATION,

22 Plaintiff,

23 vs.

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

26 Defendants.

27 Case No.: 2:21-CV-00339-GMN-VCF

28 **STIPULATION AND ORDER TO  
EXTEND TIME TO REPLY IN  
SUPPORT OF MOTIONS TO DISMISS  
AND OPPOSE COUNTERMOTION  
FOR PARTIAL SUMMARY  
JUDGMENT (ECF Nos. 28-31)**

**FIRST REQUEST**

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

1        1. On February 26, 2021 U.S. Bank filed its complaint in the Eighth Judicial District  
2 Court for the State of Nevada;

3        2. On February 28, 2021, Chicago Title removed the instant case to the United States  
4 District Court for the State of Nevada (ECF No. 1);

5        3. On April 12, 2021 FNTG, Chicago Title, and Ticor Agency moved to dismiss U.S.  
6 Bank's complaint (ECF Nos. 11-13);

7        4. On May 26, 2021, U.S. Bank filed its responses to FNTG, Chicago Title, and Ticor  
8 Agency's motions to dismiss (ECF Nos. 28-30) and filed a countermotion for partial summary  
9 judgment to Chicago Title's motion to dismiss (ECF No. 31);

10       5. Defendants request a four-week extension of their respective deadlines to reply in  
11 support of the motions to dismiss and a two-week extension of Chicago Title's deadline to oppose  
12 the countermotion for summary judgment, through and including Wednesday, June 30, 2021  
13 (such that all of Defendants' replies and the opposition are due on that date), for Defendants to  
14 file their respective responses to U.S. Bank's oppositions and countermotion to afford  
15 Defendants' counsel additional time to review and respond to U.S. Bank's oppositions and  
16 countermotion.

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

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

20       8. This stipulation is entered into without waiving any of Defendants' objections  
21 under Fed. R. Civ. P. 12.

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 Wednesday, June 30, 2021.

4           Dated: May 28, 2021

SINCLAIR BRAUN LLP

6           By: /s/-Kevin S. Sinclair

7           KEVIN S. SINCLAIR

8           Attorneys for Defendants

9           FIDELITY NATIONAL TITLE GROUP,  
10           INC., CHICAGO TITLE INSURANCE  
11           COMPANY, INC., and TICOR TITLE OF  
12           NEVADA, INC.

13           Dated: May 28, 2021

14           WRIGHT FINLAY & ZAK, LLP

15           By: /s/-Christina V. Miller

16           CHRISTINA V. MILLER

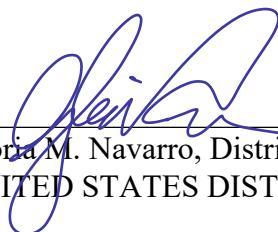
17           Attorneys for Plaintiff

18           U.S. BANK, NATIONAL ASSOCIATION

19           **IT IS SO ORDERED.**

20           June

21           Dated this 3 day of [REDACTED], 2021

22             
23           Gloria M. Navarro, District Judge  
24           UNITED STATES DISTRICT COURT