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CHICAGO TITLE INSURANCE COMPANY

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

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

19 WILMINGTON TRUST, NATIONAL
ASSOCIATION, AS SUCCESSOR
20 TRUSTEE TO CITIBANK, N.A., AS
TRUSTEE FOR STRUCTURED ASSET
21 MORTGAGE INVESTMENTS II TRUST
22 2007-AR6, MORTGAGE PASS-THROUGH
CERTIFIES SERIES 2007-AR5,

cc. Plaintiff,

24 || VS.

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

26 Defendants.

Case No.: 2:21-cv-00406-JAD-VCF

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO RENEWED MOTION FOR
REMAND [ECF No. 17]**

(First Request)

ECF No. 20

EARLY 28
SULLIVAN
WRIGHT
GIZER &
MCRAE LLP
ATTORNEYS AT LAW

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

1. On March 10, 2021, Wilmington Trust filed its Complaint in the Eighth Judicial District Court, Case No. A-21-830897-C [ECF No. 1-1];
2. On March 10, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On April 9, 2021, Wilmington Trust filed a Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8];
4. On April 22, 2021, the Court entered an order, pursuant to the Parties' stipulation, staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the "Wells Fargo II Appeal"). Upon entry of the stay the Court denied as moot, all pending motions, including the Motion for Remand. The Court further ordered that the Parties move to lift the stay and reactivate any previously filed motions within 30 days of the issuance of the mandate in the *Wells Fargo II Appeal* [ECF No. 19];
5. On December 29, 2021, Wilmington Trust filed a Renewed Motion for Remand;
6. Chicago Title's deadline to respond to Wilmington Trust's Renewed Motion for Remand is currently January 12, 2022;
7. Chicago Title's counsel is requesting an extension until February 3, 2022, to file its response to the pending Renewed Motion for Remand;
8. Chicago Title requests a brief extension of time to respond to the Motion for Remand to afford Chicago Title additional time to respond to the legal arguments set forth in Wilmington Trust's motions;
9. Wilmington Trust does not oppose the requested extension;
10. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to Wilmington Trust's
2 Motion for Remand [ECF No. 17] is hereby extended through and including February 3, 2022.
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4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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

11 Dated: January 10, 2022

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair
13 KEVIN S. SINCLAIR
14 Attorneys for Defendant CHICAGO TITLE
15 INSURANCE COMPANY

16 Dated: January 10, 2022

WRIGHT FINLAY & ZAK, LLP

17 By: /s/-Lindsay D. Dragon
18 LINDSAY D. DRAGON
19 Attorneys for Plaintiff WILMINGTON
20 TRUST, NATIONAL ASSOCIATION

21 **IT IS SO ORDERED:**

22 Dated: 1-10-2022

23 By: 
24 UNITED STATES DISTRICT COURT JUDGE