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18 Attorneys for Defendant  
19 CHICAGO TITLE INSURANCE COMPANY

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

22 Gary L. Compton, State Bar No. 1652  
23 2950 E. Flamingo Road, Suite L  
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**  
26  
27 **DISTRICT OF NEVADA**

28 U.S. BANK NATIONAL ASSOCIATION,  
19 AS TRUSTEE FOR GSR MORTGAGE  
20 LOAN TRUST 2006-4F, MORTGAGE  
21 PASS-THROUGH CERTIFICATES,  
22 SERIES 2006-4F,

23 Plaintiff,

24 vs.

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

27 Defendants.

28 Case No.: 2:21-cv-00455-GMN-BNW

29 **STIPULATION AND PROPOSED  
30 ORDER EXTENDING DEFENDANT  
31 CHICAGO TITLE INSURANCE  
32 COMPANY'S TIME TO RESPOND  
33 TO MOTION FOR REMAND [ECF  
34 No. 10] AND MOTION FOR FEES  
35 AND COSTS [ECF No. 11]**

36 **(Second Request)**

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 March 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-831364-C [ECF No. 1-1];
2. On March 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On April 19, 2021, U.S. Bank filed a Motion for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11];
4. On May 3, 2021, the Court granted the parties' first request to extend Chicago Title's time to respond to the Motion for Remand and Motion for Costs and Fees.
5. Chicago Title's deadline to respond to U.S. Bank's Motion for Remand and Motion for Costs and Fees is now June 4, 2021;
6. Chicago Title's counsel is requesting an additional extension until June 30, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests a further 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;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion  
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended  
3 through and including June 30, 2021.

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5           Dated: June 2, 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: June 2, 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: June 2, 2021

22           WRIGHT FINLAY & ZAK, LLP

23           By: /s/-Christina V. Miller  
24           DARREN T. BRENNER  
25           CHRISTINA V. MILLER  
26           Attorneys for Plaintiff U.S. BANK  
27           NATIONAL ASSOCIATION

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29           **IT IS SO ORDERED.**

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31           Dated this 3 day of June, 2021.

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3        **CERTIFICATE OF SERVICE**  
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5

6        I hereby certify that on June 2, 2021, I electronically filed the foregoing with the Clerk of  
7        the Court using the CM/ECF system which will send notification of such filing to the Electronic  
8        Service List for this Case.

9  
10      I declare under penalty of perjury under the laws of the United States of America that the  
11        foregoing is true and correct.  
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10        */s/ D'Metria Bolden* \_\_\_\_\_  
11        D'METRIA BOLDEN  
12        An Employee of EARLY SULLIVAN  
13        WRIGHT GIZER & McRAE LLP  
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