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11 *Attorneys for Plaintiff, U.S. Bank National Association, Successor in Interest to Bank of America,*
12 *National Association, Successor by Merger to LaSalle Bank National Association as Trustee for*
13 *GSAMP Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1*

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

16 U.S. BANK NATIONAL ASSOCIATION,
17 SUCCESSOR IN INTEREST TO BANK OF
18 AMERICA, NATIONAL ASSOCIATION,
19 SUCCESSOR BY MERGER TO LASSALLE
20 BANK NATIONAL ASSOCIATION AS
21 TRUSTEE FOR GSAMP TRUST 2007-NC1
22 MORTGAGE PASS-THROUGH
23 CERTIFICATES, SERIES 2007-NC1,

24 Plaintiff,

25 vs.

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

Defendants.

Case No.: 2:21-cv-00537-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO DEFENDANTS' OPPOSITION TO
MOTION TO LIFT STAY [ECF No. 23]**

[First Request]

Plaintiff U.S. Bank National Association, Successor in Interest to Bank of America,
National Association, Successor by Merger to LaSalle Bank National Association as Trustee for
GSAMP Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1 ("U.S. Bank"),
and Defendants Fidelity National Title Group, Inc., Chicago Title Insurance Company, and Ticor
Title of Nevada, Inc. ("Defendants", collectively, the "Parties"), by and through their counsel of

1 record, hereby stipulate and agree as follows:

- 2 1. On June 9, 2021, this Court issued its Order staying this case pending the Ninth Circuit's
3 resolution of *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case
4 No. 19-17332, Case No. 3:19-cv-00241-MMD-WGC [ECF No. 19].
- 5 2. On December 28, 2021, U.S. Bank filed a Motion to Lift Stay and Reopen Case [ECF No.
6 21].
- 7 3. On January 4, 2022, Defendants filed their Opposition to U.S. Bank's Motion to Lift Stay
8 and Reopen Case [ECF No. 23] and filed a Countermotion to Extend Stay pending a recent
9 appeal to the Nevada Supreme Court in *PennyMac Corporation v. Westcor Land Title*
10 *Insurance Company*, Nevada Supreme Court Case No. 83737 [ECF No. 24].
- 11 4. U.S. Bank's deadline to respond to Defendants' Opposition is January 11, 2022, while its
12 deadline to respond to Defendants' Countermotion is January 18, 2022.
- 13 5. U.S. Bank requests a seven (7) day extension of time to file its response to Defendants'
14 Opposition to the Motion to Lift Stay and Reopen Case, such that the deadline shall fall
15 on the same deadline for U.S. Bank to respond to Defendants' Countermotion, January
16 18, 2022. The extension is requested to afford US. Bank's counsel additional time to
17 review and respond to the arguments in Defendants' Opposition.
- 18 6. Counsel for Defendants do not oppose the requested extension.

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7. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 10th day of January, 2022.

DATED this 10th day of January, 2022.

WRIGHT, FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT GIZER &
McRAE LLP

/s/ Lindsay D. Dragon

/s/ Sophia S. Lau

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as Trustee for GSAMP Trust 2007-NC1
Mortgage Pass-Through Certificates, Series
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and Ticor Title of Nevada, Inc.*

IT IS SO ORDERED.

Dated January 11, 2022.


UNITED STATES DISTRICT COURT JUDGE