

1 WRIGHT, FINLAY & ZAK, LLP

2 Darren T. Brenner, Esq.

3 Nevada Bar No. 8386

4 Lindsay D. Dragon, Esq.

5 Nevada Bar No. 13474

6 7785 W. Sahara Ave., Suite 200

7 Las Vegas, NV 89117

8 (702) 475-7964; Fax: (702) 946-1345

9 [dbrenner@wrightlegal.net](mailto:dbrenner@wrightlegal.net)

10 [ldragon@wrightlegal.net](mailto:ldragon@wrightlegal.net)

11 *Attorneys for 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*

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

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

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,  
25 INC.; CHICAGO TITLE INSURANCE  
26 COMPANY; TICOR TITLE OF NEVADA,  
27 INC., DOE INDIVIDUALS I through X; and  
28 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]**

24 Plaintiff U.S. Bank National Association, Successor in Interest to Bank of America,  
25 National Association, Successor by Merger to LaSalle Bank National Association as Trustee for  
26 GSAMP Trust 2007-NC1 Mortgage Pass-Through Certificates, Series 2007-NC1 ("U.S. Bank"),  
27 and Defendants Fidelity National Title Group, Inc., Chicago Title Insurance Company, and Ticor  
28 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.

19  
20     ///

21  
22     ///

23  
24     ///

25  
26     ///

27  
28     ///

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

3                   **IT IS SO STIPULATED.**

4                   DATED this 10<sup>th</sup> day of January, 2022.

5                   WRIGHT, FINLAY & ZAK, LLP

7                   /s/ Lindsay D. Dragon

8                   Lindsay D. Dragon, Esq.  
9                   Nevada Bar No. 13474  
9                   7785 W. Sahara Ave., Suite 200  
9                   Las Vegas, NV 89117  
10                  *Attorneys for Plaintiff, U.S. Bank National  
11                  Association, Successor in Interest to Bank of  
12                  America, National Association, Successor by  
13                  Merger to LaSalle Bank National Association  
14                  as Trustee for GSAMP Trust 2007-NC1  
15                  Mortgage Pass-Through Certificates, Series  
16                  2007-NC1*

5                   DATED this 10<sup>th</sup> day of January, 2022.

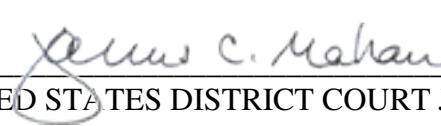
6                   EARLY SULLIVAN WRIGHT GIZER &  
6                   McRAE LLP

7                   /s/ Sophia S. Lau

8                   Sophia S. Lau, Esq.,  
9                   Nevada Bar No. 13365  
9                   8716 Spanish Ridge Avenue, Suite 105  
9                   Las Vegas, Nevada 89148  
10                  *Attorneys for Defendants, Fidelity National  
11                  Title Group, Chicago Title Insurance Company,  
12                  and Ticor Title of Nevada, Inc.*

16                  **IT IS SO ORDERED.**

17                  Dated January 11, 2022.

18                    
19                  \_\_\_\_\_  
20                  UNITED STATES DISTRICT COURT JUDGE