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11 Attorneys for Defendant  
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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16 **UNITED STATES DISTRICT COURT**  
17  
**DISTRICT OF NEVADA**

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

24 Plaintiff,

25 vs.

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

27 Defendants.

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

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO RENEWED MOTION FOR  
REMAND [ECF No. 22]**

**(First Request)**

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On April 1, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-832212-C [ECF No. 1-1];
2. On April 2, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On May 3, 2021, U.S. Bank filed a Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7];
4. On June 9, 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 file any motions that were denied as moot within 30 days of the issuance of the mandate in the *Wells Fargo II Appeal* [ECF No. 19];
5. On December 28, 2021, U.S. Bank filed a Renewed Motion for Remand;
6. Chicago Title's deadline to respond to U.S. Bank's Renewed Motion for Remand is currently January 11, 2022;
7. Chicago Title's counsel is requesting an extension until January 25, 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 U.S. Bank's motions;
9. U.S. Bank 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 U.S. Bank's Motion  
2 for Remand [ECF No. 22] is hereby extended through and including January 25, 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 U.S. BANK  
20           NATIONAL ASSOCIATION

21           **IT IS SO ORDERED:**

22           Dated: January 11, 2022

23           By: James C. Mahan  
24           UNITED STATES DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden  
D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP