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11 Attorneys for Defendant  
 12 CHICAGO TITLE INSURANCE COMPANY

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

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18  
 19 **UNITED STATES DISTRICT COURT**  
 20 **DISTRICT OF NEVADA**  
 21

22 U.S. BANK NATIONAL ASSOCIATION,  
 23 SUCCESSOR IN INTEREST TO BANK OF  
 24 AMERICA, NATIONAL ASSOCIATION,  
 25 SUCCESSOR BY MERGER TO  
 26 LASSALLE BANK NATIONAL  
 27 ASSOCIATION AS TRUSTEE FOR  
 GSAMP TRUST 2007-NC1 MORTGAGE  
 PASS-THROUGH CERTIFICATES,  
 SERIES 2007-NC1

Plaintiff,

vs.

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

Defendants.

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)**



EARLY  
 SULLIVAN  
 WRIGHT  
 GIZER &  
 McRAE LLP  
 ATTORNEYS AT LAW

**STIPULATION AND ORDER TO EXTEND TIME TO RESPOND  
 TO RENEWED MOTION FOR REMAND**

656924.1

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

- 4 1. On April 1, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court,  
 5 Case No. A-21-832212-C [ECF No. 1-1];
- 6 2. On April 2, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.  
 7 1];
- 8 3. On May 3, 2021, U.S. Bank filed a Motion for Remand [ECF No. 6] and Motion for  
 9 Costs and Fees [ECF No. 7];
- 10 4. On June 9, 2021, the Court entered an order, pursuant to the Parties’ stipulation,  
 11 staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National*  
 12 *Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the “*Wells Fargo II Appeal*”). Upon  
 13 entry of the stay the Court denied as moot, all pending motions, including the Motion  
 14 for Remand. The Court further ordered that the Parties file any motions that were  
 15 denied as moot within 30 days of the issuance of the mandate in the *Wells Fargo II*  
 16 *Appeal* [ECF No. 19];
- 17 5. On December 28, 2021, U.S. Bank filed a Renewed Motion for Remand;
- 18 6. Chicago Title’s deadline to respond to U.S. Bank’s Renewed Motion for Remand is  
 19 currently January 11, 2022;
- 20 7. Chicago Title’s counsel is requesting an extension until January 25, 2022, to file its  
 21 response to the pending Renewed Motion for Remand;
- 22 8. Chicago Title requests a brief extension of time to respond to the Motion for Remand  
 23 to afford Chicago Title additional time to respond to the legal arguments set forth in  
 24 U.S. Bank’s motions;
- 25 9. U.S. Bank does not oppose the requested extension;
- 26 10. This is the first request for an extension which is made in good faith and not for  
 27 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.

3  
4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

5  
6 By: /s/-- Sophia S. Lau  
SCOTT E. GIZER  
SOPHIA S. LAU  
7 Attorneys for Defendant CHICAGO TITLE  
8 INSURANCE COMPANY

9 Dated: January 10, 2022

SINCLAIR BRAUN LLP

10 By: /s/-Kevin S. Sinclair  
11 KEVIN S. SINCLAIR  
Attorneys for Defendant CHICAGO TITLE  
12 INSURANCE COMPANY

13 Dated: January 10, 2022

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Lindsay D. Dragon  
15 LINDSAY D. DRAGON  
Attorneys for Plaintiff U.S. BANK  
16 NATIONAL ASSOCIATION

17 **IT IS SO ORDERED:**

18  
19 Dated: January 11, 2022

20 By:   
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

