

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & MCRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Boulevard, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

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 ADJUSTABLE RATE
20 MORTGAGE TRUST 2005-4,
21 ADJUSTABLE RATE MORTGAGE-
BACKED PASS-THROUGH
22 CERTIFICATES, SERIES 2005-4,

23 Plaintiff,

24 vs.

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

27 Defendants.

28 Case No.: 2:21-cv-01186-APG-BNW

19 **STIPULATION AND PROPOSED
20 ORDER EXTENDING DEFENDANT
21 CHICAGO TITLE INSURANCE
22 COMPANY'S TIME TO RESPOND
23 TO MOTION FOR REMAND [ECF
24 No. 7] AND MOTION FOR FEES AND
25 COSTS [ECF No. 8]**

26 **(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 June 21, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-836669-C [ECF No. 1-1];
2. On June 22, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On July 7, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8];
4. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion for Costs and Fees is currently due July 21, 2021;
5. Chicago Title’s counsel is requesting an extension until August 20, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
6. 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;
7. U.S. Bank does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay;

111

111

111

111

111

111

111

111

111

IT IS SO STIPULATED that Chicago Title's deadline to respond to U.S. Bank's Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through and including August 20, 2021.

Dated: July 15, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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

Dated: July 15, 2021

SINCLAIR BRAUN LLP

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

Dated: July 15, 2021

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner
DARREN T. BRENNER
CHRISTINA V. MILLER
Attorneys for Plaintiff U.S. BANK
NATIONAL ASSOCIATION

IT IS SO ORDERED:

Dated: July 16, 2021