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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)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK, NATIONAL ASSOCIATION,
28 AS TRUSTEE FOR ADJUSTABLE RATE
29 MORTGAGE TRUST 2005-4,
30 ADJUSTABLE RATE MORTGAGE-
31 BACKED PASS-THROUGH
32 CERTIFICATES, SERIES 2005-4,

33 Plaintiff,

34 vs.

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

37 Defendants.

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

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

(First Request)

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 June 21, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court,
5 Case No. A-21-836669-C [ECF No. 1-1];
- 6 2. On June 22, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.
7 1];
- 8 3. On July 7, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7] and Motion for
9 Costs and Fees [ECF No. 8];
- 10 4. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion
11 for Costs and Fees is currently due July 21, 2021;
- 12 5. Chicago Title’s counsel is requesting an extension until August 20, 2021, to file its
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 6. Chicago Title requests a further extension of time to respond to the Motion for
15 Remand and Motion for Costs and Fees to afford Chicago Title additional time to
16 respond to the legal arguments set forth in U.S. Bank’s motions;
- 17 7. U.S. Bank does not oppose the requested extension;
- 18 8. This is the first request for an extension which is made in good faith and not for
19 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. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through
3 and including August 20, 2021.

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5 Dated: July 15, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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

10 Dated: July 15, 2021

SINCLAIR BRAUN LLP

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

14 Dated: July 15, 2021

WRIGHT FINLAY & ZAK, LLP

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

19 **IT IS SO ORDERED:**

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21 Dated: July 16, 2021

22 By: 
23 UNITED STATES DISTRICT COURT JUDGE
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