

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 Attorneys for Specially-Appearing Defendant OLD REPUBLIC  
12 TITLE INSURANCE GROUP, INC. and Defendants  
13 OLD REPUBLIC NATIONAL TITLE INSURANCE  
14 COMPANY and OLD REPUBLIC TITLE COMPANY OF  
15 NEVADA

16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST  
19 COMPANY, AS TRUSTEE FOR MORGAN  
20 STANLEY DEAN WITTER CAPITAL I  
21 INC. TRUST 2003-NC2, MORTGAGE  
22 PASS-THROUGH CERTIFICATES, SERIES  
23 2003-NC2,

24 Plaintiff,

25 vs.

26 OLD REPUBLIC TITLE INSURANCE  
27 GROUP, INC., OLD REPUBLIC  
28 NATIONAL TITLE INSURANCE  
COMPANY; OLD REPUBLIC TITLE  
COMPANY OF NEVADA; DOE  
INDIVIDUALS I through X; and ROE  
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:21-cv-01466-GMN-DJA

**STIPULATION AND PROPOSED  
ORDER TO EXTEND DEFENDANTS'  
TIME TO RESPOND TO COMPLAINT**

**(First Request)**

1 Defendants Old Republic National Title Insurance Company (“Old Republic”) and Old  
 2 Republic Title Company of Nevada (“Old Republic Agency”) and Specially-Appearing  
 3 Defendant Old Republic Title Insurance Group, Inc. (“ORTIG”) (collectively, “Defendants”) and  
 4 plaintiff Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter  
 5 Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2 (“Deutsche  
 6 Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate as  
 7 follows:

8 **WHEREAS**, Deutsche Bank commenced the action by filing a Complaint on August 5,  
 9 2021, in the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-21-  
 10 839034-C);

11 **WHEREAS**, on August 6, 2021, Old Republic filed a Petition of Removal with this  
 12 Court, based upon diversity jurisdiction (ECF No. 1);

13 **WHEREAS**, on August 18, 2021, Deutsche Bank served Old Republic Agency with the  
 14 complaint pursuant to the executed Affidavit of Service filed on August 24, 2021 (ECF No. 7);

15 **WHEREAS**, on August 25, 2021, Deutsche Bank served Old Republic with the complaint  
 16 pursuant to the executed Affidavit of Service filed on August 31, 2021 (ECF No. 9);

17 **WHEREAS**, on August 27, 2021, Deutsche Bank served ORTIG with the complaint  
 18 pursuant to the executed Affidavit of Service filed on September 1, 2021 (ECF No. 10);

19 **WHEREAS**, Old Republic Agency’s response to the Complaint is due on September 8,  
 20 2021;

21 **WHEREAS**, Old Republic’s response to the Complaint is due on September 15, 2021;

22 **WHEREAS**, ORTIG’s response to the Complaint is due on September 17, 2021;

23 **WHEREAS**, Defendants are requesting an extension of time to respond to the Complaint  
 24 to afford their counsel additional time to review, analyze and respond to Deutsche Bank’s  
 25 Complaint;

26 **WHEREAS**, Deutsche Bank has agreed to extend Defendants’ time to respond to the  
 27 Complaint so that all of Defendants’ responses to the Complaint are due on or before October 8,  
 28 2021; and

1           **WHEREAS**, this is the first stipulation for an extension of Defendants' time to respond to  
2 the complaint.

3           Now, therefore, the Parties hereto, by and through their counsel of record, hereby stipulate  
4 and agree as follows:

5           1.       Defendants shall respond to the complaint on or before October 8, 2021.  
6           2.       Defendants intend to preserve their rights and do not expressly waive any and all  
7 defenses listed in Fed. R. Civ. P. 12(b).

8  
9           DATED this 7th day of September, 2021

10           WRIGHT FINLAY & ZAK, LLP

11           */s/-Lindsay D. Robbins*

12           By: \_\_\_\_\_

13           Darren T. Brenner  
14           Nevada State Bar No. 8386  
15           Lindsay D. Robbins  
16           Nevada State Bar No. 13474  
17           7785 W. Sahara Ave, Suite 200  
18           Las Vegas, NV 89117

19           Attorneys for Plaintiff  
20           DEUTSCHE BANK NATIONAL  
21           TRUST COMPANY, AS TRUSTEE  
22           FOR MORGAN STANLEY DEAN  
23           WITTER CAPITAL I INC. TRUST  
24           2003-NC2, MORTGAGE PASS-  
25           THROUGH CERTIFICATES, SERIES  
26           2003-NC2

27           DATED this 7th day of September, 2021

28           EARLY SULLIVAN WRIGHT  
29           GIZER & MCRAE LLP

30           */s/-Sophia S. Lau*

31           By: \_\_\_\_\_

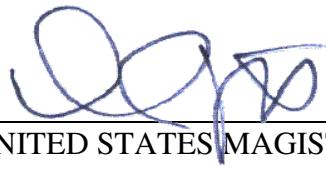
32           Scott E. Gizer  
33           Nevada State Bar No. 12216  
34           Sophia S. Lau  
35           Nevada State Bar No. 13365  
36           8716 Spanish Ridge Ave., Ste. 105  
37           Las Vegas, NV 89148

38           Attorneys for Specially-Appearing Defendant  
39           OLD REPUBLIC TITLE INSURANCE  
40           GROUP, INC. and Defendants  
41           OLD REPUBLIC NATIONAL TITLE  
42           INSURANCE COMPANY and OLD  
43           REPUBLIC TITLE COMPANY OF  
44           NEVADA

45           **ORDER**

46           **IT IS SO ORDERED:**

47           Dated: September 8, 2021

48           By:   
49           UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on September 7, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filling 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