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19 FIDELITY NATIONAL TITLE GROUP, INC.

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

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24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 DEUTSCHE BANK NATIONAL TRUST
28 COMPANY,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE
COMPANY et al.,

Defendants.

Case No.: 2:21-CV-01854-CDS-DJA

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR
FIDELITY NATIONAL TITLE
GROUP, INC. TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIFTH REQUEST

COMES NOW defendant Fidelity National Title Group, Inc. ("FNTG") and plaintiff Deutsche Bank National Trust Company ("Deutsche Bank"), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On October 6, 2021 Deutsche Bank filed its complaint in the Eighth Judicial

District Court for the State of Nevada;

2. On October 6, 2021, defendant Chicago Title Insurance Company removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);

3. On January 19, 2022, the parties submitted the first stipulation for an extension of time for the defendants to respond to Deutsche Bank's complaint, which was granted by the Court on January 20, 2022 (ECF No. 24);

4. On February 23, 2022 the parties submitted the second stipulation for an extension of time for the defendants to respond to Deutsche Bank's complaint, which was granted by the Court on February 24, 2022 (ECF No. 26);

5. On March 21, 2022, the parties submitted the third stipulation for an extension of time for the defendants to respond to Deutsche Bank's complaint, which was granted by the Court on March 22, 2022 (ECF No. 28);

6. On April 25, 2022, the parties submitted the fourth stipulation for an extension of time for the defendants to respond to Deutsche Bank's complaint, which was granted by the Court on April 26, 2022 (ECF No. 33);

7. The parties have reached a tentative agreement that will result in the dismissal of FNTG from this matter, and as a result, request a 50-day extension of time for FNTG to respond to the complaint, through and including Tuesday, June 28, 2022, to allow the parties to finalize the agreement to dismiss FNTG from this action.

8. Counsel for Deutsche Bank does not oppose the requested extension;

9. This is the fifth request for an extension made by counsel for FNTG, which is made in good faith and not for the purposes of delay.

10. This stipulation is entered into without waiving any of FNTG's objections under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that FNTG's deadline to respond to the complaint is hereby
2 extended through and including June 28, 2022.

3 Dated: May 9, 2022

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
FIDELITY NATIONAL TITLE GROUP,
INC.

8 Dated: May 9, 2022

WRIGHT FINLAY & ZAK, LLP

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10 By: /s/-Lindsay D. Dragon
11 LINDSAY D. DRAGON
12 Attorneys for Plaintiff
DEUTSCHE BANK NATIONAL TRUST
COMPANY

13 **IT IS SO ORDERED.**

14 Dated this 10th day of May, 2022.

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17 DANIEL J. ALBREGTS
18 UNITED STATES MAGISTRATE JUDGE
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