

1 Kevin S. Sinclair, NV Bar No. 12277
 2 *ksinclair@sinclairbraun.com*
 3 SINCLAIR BRAUN LLP
 4 16501 Ventura Blvd, Suite 400
 5 Encino, California 91436
 6 Telephone: (213) 429-6100
 7 Facsimile: (213) 429-6101

8 Attorneys for Defendant
 9 NORTH AMERICAN TITLE INSURANCE COMPANY

10 DESIGNATED LOCAL COUNSEL FOR SERVICE
 11 PER L.R. IA 11-1(b)

12 Gary L. Compton, State Bar No. 1652
 13 2950 E. Flamingo Road, Suite L
 14 Las Vegas, Nevada 89121

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 DEUTSCHE BANK NATIONAL TRUST
 18 COMPANY,

19 Plaintiff,

20 vs.

21 NORTH AMERICAN TITLE INSURANCE
 22 COMPANY,

23 Defendant.

Case No.: 2:22-cv-00547-GMN-BNW

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO RESPOND
 TO COMPLAINT (ECF No. 1-1)**

FOURTH REQUEST

24 COMES NOW defendant North American Title Insurance Company (“North American”) and plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

- 25 1. On March 29, 2022, Deutsche Bank filed its complaint in the Eighth Judicial District Court for the State of Nevada;
- 26 2. On March 31, 2022, North American removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);
- 27 3. On April 28, 2022 the Court granted the parties’ first stipulation for an extension of time to respond to the complaint, extending North American’s response deadline to May 27, 2022 (ECF No. 11);



1 4. On June 2, 2022, the Court granted the parties’ second stipulation for an extension
2 of time to respond to the complaint, extending North American’s response deadline to June 27,
3 2022 (ECF No. 17);

4 5. On June 30, 2022, the Court granted the parties’ third stipulation for an extension
5 of time to respond to the complaint, extending North American’s response deadline to July 27,
6 2022 (ECF No. 19);

7 6. The parties have reached an agreement to temporarily stay this case, which the
8 parties are memorializing in a separate stipulation;

9 7. Counsel for North American requests a 30-day extension, through and including
10 Friday, August 26, 2022, for North American to file its response to Deutsche Bank’s complaint,
11 pending the Court’s consideration of the aforementioned stipulation to stay this case;

12 8. This is the fourth request for an extension made by counsel for North American,
13 which is made in good faith and not for the purposes of delay.

14 9. This stipulation is entered into without waiving any of North American’s
15 objections under Fed. R. Civ. P. 12.

16 **IT IS SO STIPULATED** that North American’s deadline to respond to the complaint is
17 hereby extended through and including Friday, August 26, 2022.

18 Dated: July 27, 2022

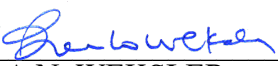
SINCLAIR BRAUN LLP
By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
Attorneys for Defendant
NORTH AMERICAN TITLE INSURANCE
COMPANY

21 Dated: July 27, 2022

WRIGHT FINLAY & ZAK, LLP
By: /s/-Lindsay D. Dragon
LINDSAY D. DRAGON
Attorneys for Plaintiff
DEUTSCHE BANK NATIONAL TRUST
COMPANY

22 **IT IS SO ORDERED.**

23 Dated this 1st day of August, 2022.

24 

BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE

