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11 *Attorneys for Plaintiff, Wells Fargo Bank N.A. as Trustee on behalf of the Certificate holders
12 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series, 2005-WCW1*

13 **UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA**

15 WELLS FARGO BANK, N.A. AS TRUSTEE
16 ON BEHALF OF THE CERTIFICATE-
17 HOLDERS PARK PLACE SECURITIES,
18 INC. ASSET-BACKED PASS-THROUGH
19 CERTIFICATES SERIES 2005-WCW1,

20 Plaintiff,

21 vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC.; FIDELITY NATIONAL TITLE
24 INSURANCE COMPANY; DOE
25 INDIVIDUALS I through X; and ROE
26 CORPORATIONS XI through XX, inclusive,

27 Defendants.

28 Case No.: 2:22-cv-00616-APG-EJY

29 **STIPULATION AND ORDER TO
30 EXTEND TIME TO FILE AMENDED
31 COMPLAINT**

32 **(First Request)**

33 Plaintiff, Wells Fargo Bank N.A. as Trustee on behalf of the Certificate holders Park Place
34 Securities, Inc. Asset-Backed Pass-Through Certificates Series, 2005-WCW1 (“Wells Fargo”),
35 and Defendants Fidelity National Title Group, Inc. (“FNTG”) and Fidelity National Title
36 Insurance Company (“FNTIC” collectively the “Defendants” and with Wells Fargo, the “Parties”),
37 hereby submit the following Stipulation to Extend Time to File Amended Complaint. The Parties,
38 by and through their undersigned counsel, stipulate and agree as follows:

39 1. On April 12, 2022, Wells Fargo filed its Complaint in Eighth Judicial District
40 Court, Case No. A-22-851046-C [ECF No. 1-1];

1 2. On April 13, 2022, Defendants filed a Petition for Removal to this Court [ECF No.
2 1];

3 3. Thereafter, on October 28, 2022, the Court granted in part FNTIC's motion to
4 dismiss [ECF No. 17] and ordered that Wells Fargo may file an amended complaint, if facts exist
5 to do so [ECF No. 27].

6 4. Wells Fargo's deadline to file its Amended Complaint is currently November 18,
7 2022;

8 5. Wells Fargo has conferred with Defendants and requested an extension of five (5)
9 days to November 23, 2022, to file its Amended Complaint because Wells Fargo's counsel has
10 been out of town;

11 6. Defendants do not object to the requested extension;

12 7. The Parties hereby agree that Wells Fargo shall have an additional five (5) days
13 up to and including November 23, 2022 to file its Amended Complaint.

14 **IT IS SO STIPULATED.**

15 DATED this 18th day of November, 2022.

16 WRIGHT, FINLAY & ZAK, LLP

17 /s/ Lindsay D. Dragon

18 Lindsay D. Dragon, Esq.
19 Nevada Bar No. 13474
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21 Las Vegas, NV 89117
22 Attorneys for Plaintiff, Wells Fargo Bank N.A.
23 as Trustee on behalf of the Certificate holders
24 Park Place Securities, Inc. Asset-Backed
25 Pass-Through Certificates Series, 2005-
26 WCW1

15 DATED this 18th day of November, 2022.

16 SINCLAIR BRAUN LLP

17 /s/ Kevin S. Sinclair

18 Kevin S. Sinclair, Esq.
19 Nevada Bar No. 12277
20 16501 Ventura Blvd., Suite 400
21 Encino, CA 91436
22 Attorney for Defendants, Fidelity National
23 Title Group, Inc. and Fidelity National Title
24 Insurance Company

24 **IT IS SO ORDERED.**

25
26
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28 

 Layna J. Zouchah
 UNITED STATES MAGISTRATE JUDGE

Dated: November 18, 2022