

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

First American Title Insurance Company v. Commerce Associates, LLC, et al.

First American Title · No. 2:15-cv-00832-RFB-MDC · Decided January 5, 2026

SUMMARY

The United States District Court for the District of Nevada adopted a magistrate judge’s Report and Recommendation after no objections were filed. The court partially granted First American Title Insurance Company’s motion for attorney’s and expert fees and awarded \$389,310 in attorney’s fees and \$18,539.15 in expert fees under the Purchase Agreement.

CASE DETAILS

COURT	United States District Court for the District of Nevada
WRITING FOR THE COURT	Richard F. Boulware, II
JURISDICTION	United States District Court for the District of Nevada
DECIDED	January 5, 2026
DOCKET	2:15-cv-00832-RFB-MDC
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation concerning First American Title Insurance Company's motion for attorney's fees and expert fees. No objections were filed, and the district court accepted and adopted the Report and Recommendation in full and granted the motion in part.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1), specific objections require de novo review of the portions of a magistrate judge's report to which objection is made; when no objections are filed, the district court is not required to conduct review of the report and recommendation.
PRECEDENTIAL VALUE	nonprecedential district court order

TOPICS

attorney fees costs civil procedure contracts commercial litigation

PRACTICE AREAS

civil procedure

contracts

commercial litigation

attorney fees

damages

QUESTIONS PRESENTED

1. Whether the district court should accept and adopt the magistrate judge's Report and Recommendation when no objections were filed.
2. Whether First American Title Insurance Company's motion for an award of attorney's fees and expert fees should be granted.

HOLDINGS

1. The district court accepted and adopted the Report and Recommendation in full after no party filed objections and after reviewing the record and concurring with the magistrate judge's recommendation.
2. First American Title Insurance Company's motion for attorney's fees and expert fees was granted in part, and First American was awarded \$389,310 in reasonable attorney's fees and \$18,539.15 in reasonable expert fees, totaling \$407,849.15 pursuant to the Purchase Agreement.

KEY QUOTATIONS

“Where a party fails to object, however, a district court is not required to conduct “any review,” de novo or otherwise, of the report and recommendations of a magistrate judge.” (at 1)

“IT IS THEREFORE ORDERED that the Report and Recommendation (ECF No. 227) is ACCEPTED and ADOPTED in full.” (at 2)

FACTUAL BACKGROUND

The order concerns First American Title Insurance Company's request for attorney's fees and expert fees under a Purchase Agreement. The magistrate judge recommended disposition of the fee motion. The district court adopted that recommendation and awarded \$389,310 in attorney's fees and \$18,539.15 in expert fees.

PROCEDURAL HISTORY

Magistrate Judge Maximiliano D. Couvillier, III, entered a Report and Recommendation on November 24, 2025. Objections were due December 8, 2025, but none were filed. The district court reviewed the record, concurred with the recommendation, accepted and adopted it in full, and partially granted First American's motion for fees.

DISPOSITION

other

CASES CITED

- Thomas v. Arn, 474 U.S. 140, 149 (1985)

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