

1 ANDERSON LAW
 2 DAVID C. ANDERSON, State Bar # 83146
 3 JONATHAN M. SHUGART, State Bar # 278221
 4 50 Francisco Street, Suite 450
 5 San Francisco, CA 94133
 6 Telephone: (415) 395-9898
 7 Facsimile: (415) 395-9839

8 Attorneys for Plaintiff
 9 RHIANNIN SKEELS

10 UNITED STATES DISTRICT COURT
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 12 DIVISION OF SAN FRANCISCO

13 RHIANNIN SKEELS,
 14 Plaintiff,

15 vs.

16 OFFICER KENDRICK PILEGAARD,
 17 individually and in his capacity as a
 18 Novato Police Department officer; CITY
 19 OF NOVATO, CALIFORNIA; NOVATO
 20 POLICE DEPARTMENT; CHIEF
 21 JOSEPH KREINS, individually and in his
 22 official capacity as Novato Police
 23 Department Chief; VERONIQUE L. AU,
 24 M.D.; SUTTER HEALTH; NOVATO
 25 COMMUNITY HOSPITAL; COUNTY
 26 OF MARIN, CALIFORNIA; MARIN
 27 COUNTY SHERIFF'S OFFICE;
 28 SHERIFF ROBERT T. DOYLE,
 individually and in his capacity as Marin
 County Sheriff; and DOES 1 through 100,
 inclusive,

Defendants.

No. CV-12-02175 TEH
 Assigned to Judge Thelton E. Henderson

**JOINT REQUEST FOR ORDER OF
 VOLUNTARY DISMISSAL OF
 DEFENDANT VERONIQUE L. AU,
 M.D. AND ~~PROPOSED~~ ORDER**

1 TO THE HONORABLE JUDGE OF THE ABOVE-ENTITLED COURT, THE
2 PARTIES AND THEIR ATTORNEYS OF RECORD:

3 On or around December 4, 2013, Plaintiff RHIANNIN SKEELS and Defendant
4 VERONIQUE L. AU, M.D. reached a settlement agreement in the above-titled matter under the
5 following terms and conditions: that Defendant AU will, in exchange for a dismissal with
6 prejudice of Defendant AU, waive any claim for costs and right to proceed with any action in
7 malicious prosecution against Plaintiff SKEELS, or her attorneys; both parties shall bear their
8 own costs and attorneys' fees associated with this litigation.

9 Plaintiff notes that Defendant VERONIQUE L. AU, M.D.'s Motion for Summary
10 Judgment is set for hearing in Department 2 of the above titled court on January 13, 2014 at
11 10:00 A.M. This motion should be taken off calendar subject to the court's order dismissing Dr.
12 AU as herein requested.

13 Plaintiff RHIANNIN SKEELS and Defendant VERONIQUE L. AU, M.D., by and
14 through their designated counsel, hereby Request an Order of Voluntary Dismissal pursuant to
15 Fed. Rules Civ. Pro. Rule 41(a)(2) of Defendant VERONIQUE L. AU, M.D. with prejudice.
16 The parties further request that the Order provide that VERONIQUE L. AU, M.D. waives any
17 claim for costs and right to proceed with any action in malicious prosecution against Plaintiff
18 SKEELS, or her attorneys, and that each party shall be responsible for its own costs and
19 attorneys' fees associated with this litigation.

20
21 Dated: December 5, 2013

ANDERSON LAW

22
23

/s/
DAVID C. ANDERSON
Attorney for Plaintiff Rhiannin Skeels

24

25 Dated: December 5, 2013

DONNELLY NELSON DEPOLO & MURRAY

26
27

/s/
THOMAS J. DONNELLY
Attorney for Defendant Veronique L. Au, M.D.

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER OF VOLUNTARY DISMISSAL OF
DEFENDANT VERONIQUE AU, M.D.

The Joint Request for Order of Voluntary Dismissal of Plaintiff RHIANNIN SKEELS and Defendant VERONIQUE L. AU, M.D. pursuant to Fed. Rules Civ. Pro. Rule 41(a)(2) in the above titled action came before this court on this day. Finding good case therefor, it is hereby ORDERED that:

1. Defendant VERONIQUE L. AU, M.D. is dismissed with prejudice;
2. Defendant VERONIQUE L. AU, M.D. waives any claim for costs and right to proceed with any action in malicious prosecution against Plaintiff SKEELS, or her attorneys;
3. Each party shall be responsible for its own costs and attorneys' fees associated with this litigation.

Dated: _____ 12/09, 2013

