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5 Attorneys for Plaintiff  
 6 RHIANNIN SKEELS

7 UNITED STATES DISTRICT COURT  
 8 NORTHERN DISTRICT OF CALIFORNIA

10 RHIANNIN SKEELS,  
 11 Plaintiff,

12 v.

13 OFFICER KENDRICK PILEGAARD,  
 14 individually and in his capacity as a Novato  
 15 Police Department officer; CITY OF  
 16 NOVATO, CALIFORNIA; NOVATO POLICE  
 17 DEPARTMENT; VERONIQUE L. AU, M.D.;  
 18 SUTTER WESTBAY HOSPITALS d.b.a.  
 NOVATO COMMUNITY HOSPITAL;  
 19 COUNTY OF MARIN, CALIFORNIA;  
 MARIN COUNTY SHERIFF'S OFFICE; and  
 DOES 1-50, inclusive,

20 Defendants.

Case No. CV 12-2175 THE  
 Assigned to Judge Thelton E. Henderson

**STIPULATION OF PARTIES TO  
 EXTEND DISCOVERY DEADLINE**

21  
 22 Plaintiff RHIANNIN SKEELS and Defendants CITY OF NOVATO, NOVATO POLICE DEPT.,  
 23 CHIEF J. KREINS, OFF. K. PILEGAARD, by and through their designated counsel, hereby submit their  
 24 Stipulation to Extend Discovery and agree to extend the discovery deadline, currently set for June 30,  
 25 2014, up to and including July 14, 2014 to permit time to complete two discovery matters, as follows:

- 26 1. Plaintiff to provide answers to written discovery; and
- 27 2. Defense Psychiatric Examination of Plaintiff.

1 Good cause exists for the requested stipulation because plaintiff resides outside the State of  
2 California and works full time, making it difficult for plaintiff's counsel to meet with her during business  
3 hours and making it difficult to schedule a Defense Psychiatric Examination.

4 Counsel have met and conferred extensively and are cooperating to complete these two remaining  
5 discovery items.

6 This requested extension of time will not affect any scheduled court dates or deadlines.

7 **IT IS SO STIPULATED AND AGREED.**

8 Dated: June 24, 2014

ANDERSON LAW

9 By: /s/ David C. Anderson

10 David C. Anderson  
11 Counsel for Plaintiff  
12 RHIANNIN SKEELS

13 Dated: June 24, 2014

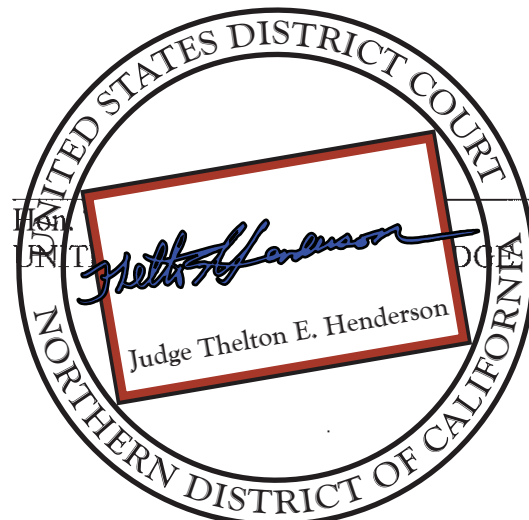
BERTRAND, FOX & ELLIOT

14 By: /s/ Richard W. Osman

15 Richard W. Osman  
16 Counsel for Defendants  
17 CITY OF NOVATO,  
18 NOVATO POLICE DEPARTMENT  
19 and OFFICER KENDRICK PILEGAARD

20 **IT IS SO ORDERED:**

21 Dated: 06/24/2014



1 **Skeels v. Pilgaard, et al.**  
2 **U.S. DISTRICT COURT NO. CV 12-02175 TEH**  
3 **PROOF OF SERVICE BY MAIL**  
4 **STATE OF CALIFORNIA, U.S. DISTRICT COURT**

5 I, the undersigned, declare as follows:

6 I am over 18 years of age and not a party to the within action; my business address  
7 is 711 Van Ness Avenue, Suite 220, San Francisco, CA 94102; I am employed in San  
8 Francisco County, California.

9 I am readily familiar with my employer's practices for collection and processing of  
10 correspondence for mailing with the United States Postal Service.

11 On the below date, I served a copy of the following document(s):

12 **STIPULATION OF PARTIES TO EXTEND DISCOVERY DEADLINE**

13 on the interested parties in the above-referenced case by following ordinary business  
14 practices and placing for collection and mailing a true copy of the above-referenced  
15 document(s), enclosed in sealed envelope(s); in the ordinary course of business, the above  
16 document(s) would have been deposited for first-class delivery with the United States  
17 Postal Service the same day they were placed for deposit, with postage thereon fully  
18 prepaid,

19 The foregoing was/were addressed as follows:

20 Thomas F. Bertrand, Esq.  
21 Richard Osman, Esq., ext.  
22 Bertrand, Fox & Elliot  
23 The Waterfront Building  
24 2749 Hyde Street  
25 San Francisco, CA 94109  
353-0999  
353-0990 fax  
Atty. For Def. City of Novato, Novato  
Police Dept., Chief J. Kreins, Off. K.  
Pilegaard

I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct and that this declaration was executed on June 24, 2014.

/s/ Cynthia Sparks  
CYNTHIA SPARKS

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