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7 Attorneys for Plaintiff
 8 RHIANNIN SKEELS

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

12 RHIANNIN SKEELS,
 13 Plaintiff,

14 vs.

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

Defendants.

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

**STIPULATION OF PLAINTIFF
 RHIANNIN SKEELS, DEFENDANT
 CHIEF JOSEPH KREINS, AND
 DEFENDANT SHERIFF ROBERT T.
 DOYLE**

Plaintiff RHIANNIN SKEELS and Defendants CHIEF JOSEPH KREINS and SHERIFF
 ROBERT T. DOYLE, by and through counsel, HEREBY STIPULATE to the following:

1. That Plaintiff will dismiss without prejudice Defendants KREINS and DOYLE
 from her complaint;

1 2. That at any time not more than 14 days after close of discovery, Plaintiff can
 2 apply to the court for permission to amend the complaint adding KREINS and/or DOYLE as
 3 defendants without any opposition from KREINS and DOYLE, and that Plaintiff, KREINS, and
 4 DOYLE agree to jointly seek leave of court to reopen discovery for 60 days, limited to issues
 5 included in the amended complaint;

6 3. That KREINS and DOYLE agree to toll all applicable statute of limitations
 7 defenses to Plaintiff's complaint while Plaintiff's complaint is pending.

8 IT IS SO STIPULATED:

9 DATE: Oct. 29, 2012

OFFICE OF MARIN COUNTY COUNSEL

11 By: *Stephen R. Raab*

12 Stephen R. Raab
13 Attorneys for Defendant SHERIFF ROBERT T.
14 DOYLE

15 DATE: 10-29, 2012

BERTRAND, FOX, & ELLIOTT

17 By: *Thomas F. Bertrand*

18 Thomas F. Bertrand Richard W. Osman
19 Attorneys for Defendant CHIEF JOSEPH KREINS

20 DATE: 10-29, 2012

ANDERSON LAW

22 By: *David C. Anderson*

23 David C. Anderson
24 Attorneys for Plaintiff RHIANNIN SKEELS

25 APPROVED:

27 DATE: 11/05, 2012

