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 9 RHIANNIN SKEELS

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

13 RHIANNIN SKEELS,  
 14 )  
 15 ) Plaintiff,

16 vs.

17 OFFICER KENDRICK PILEGAARD,  
 18 individually and in his capacity as a  
 19 Novato Police Department officer; CITY  
 20 OF NOVATO, CALIFORNIA; NOVATO  
 21 POLICE DEPARTMENT; CHIEF  
 22 JOSEPH KREINS, individually and in his  
 23 official capacity as Novato Police  
 24 Department Chief; VERONIQUE L. AU,  
 25 M.D.; SUTTER HEALTH; NOVATO  
 26 COMMUNITY HOSPITAL; COUNTY  
 27 OF MARIN, CALIFORNIA; MARIN  
 28 COUNTY SHERIFF'S OFFICE;  
 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

NOTICE OF CONDITIONAL  
 SETTLEMENT OF LAWSUIT  
 BETWEEN PLAINTIFF AND  
 DEFENDANT COUNTY OF MARIN;  
 NOTICE OF INTENT TO FILE  
 REQUEST FOR VOLUNTARY  
 DISMISSAL; REQUEST TO CONTINUE  
 ENTRY OF JUDGMENT FOR  
 DEFENDANT COUNTY OF MARIN  
 AFTER RULING ON MOTION FOR  
 JUDGMENT ON THE PLEADINGS;  
 [PROPOSED] ORDER

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

3 PLEASE TAKE NOTICE that Plaintiff RHIANNIN SKEELS and Defendants  
4 COUNTY OF MARIN, MARIN COUNTY SHERIFF'S OFFICE, and SHERIFF ROBERT T.  
5 DOYLE, (hereinafter collectively, "COUNTY"), have reached a settlement agreement in the  
6 above-titled matter. Counsel for Plaintiff and COUNTY have agreed upon the terms of a  
7 settlement release agreement and forwarded said agreement to their clients. Said agreement  
8 contains provisions prohibiting Plaintiff from suing any COUNTY employees, independent  
9 contractors, contract employees, agents, personnel, officers or elected officials who are now or  
10 have been employed by or served for the COUNTY, including those Marin County Jail  
11 employees who have been named as fictitious "DOE" defendants in Plaintiff's Third Amended  
12 Complaint. Plaintiff SKEELS and an authorized representative of COUNTY have signed the  
13 settlement release agreement. As SKEELS resides in Las Vegas, Nevada, her original signature  
14 page has not yet been received by counsel via United States mail, but counsel has received a  
15 copy of her signed agreement via e-mail. On November 5, 2013, counsel for each party e-  
16 mailed signed copies of the settlement release agreement to opposing counsel. The settlement  
17 will be finalized once the original signature pages of the settlement release agreement are  
18 received by counsel.

19 PLEASE TAKE FURTHER NOTICE that pursuant to the settlement release agreement  
20 between Plaintiff and COUNTY, Plaintiff has agreed to file a Request for Voluntary Dismissal  
21 of the COUNTY, with prejudice, in the above-titled court, within fourteen days after the  
22 settlement is finalized.

23 On October 16, 2013, this Court granted COUNTY's motion for judgment on the  
24 pleadings, and granted Plaintiff leave to file a motion to modify case management order  
25 pursuant to Fed. Rule Civ. Pro. Rule 16(b)(4). (Docket No. 91). This court set a deadline of  
26 November 6, 2013, for Plaintiff to file said motion. (Docket No. 91). Plaintiff does not intend  
27 to file said motion in light of the conditional settlement agreement between her and COUNTY.

1 In the interests of justice, Plaintiff HEREBY REQUESTS that the Court continue its entry of  
2 judgment for COUNTY after ruling on COUNTY's motion for judgment on the pleadings 30  
3 days to allow Plaintiff and COUNTY to finalize their settlement agreement and for Plaintiff to  
4 submit a Request for Voluntary Dismissal with this court.

5  
6 Dated: November 6, 2013

ANDERSON LAW

7  
8 /s/  
DAVID C. ANDERSON  
Attorney for Plaintiff Rhiannin Skeels

9  
10  
11 **ORDER**

12 Having read the Notice of Conditional Settlement of Lawsuit Between Plaintiff and  
13 Defendant County of Marin, the Notice of Intent to File Request for Voluntary Dismissal, and  
14 the Request to Continue Entry of Judgment for Defendant County of Marin After Ruling On  
15 Motion For Judgment On the Pleadings filed by Plaintiff RHIANNIN SKEELS on November 6,  
16 2013, and finding good cause therefor, IT IS HEREBY ORDERED THAT:

- 17 1. The Court will continue for 30 days from the date of entry of this order its entry  
18 of judgment for Defendant COUNTY OF MARIN CALIFORNIA, MARIN  
19 COUNTY after ruling on motion for judgment for the pleadings;  
20 2. Plaintiff shall file a Request for Voluntary Dismissal with this court within 30  
21 days of entry of this order.

22  
23  
24 Dated: 11/06/2013

