

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

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN T. GOHRANSON, individually, and as  
Personal Representative of the Estate of  
Lindsay M. Kronberger,

Plaintiff,

vs.

SNOHOMISH COUNTY, a municipal  
Corporation in the State of Washington, et al.,

Defendants.

NO. C16-01124-RSL

STIPULATION AND ~~PROPOSED~~  
ORDER DISMISSING PLAINTIFF  
GOHRANSON'S CLAIM OF OUTRAGE  
AND ALL CLAIMS AGAINST  
DEFENDANT DAN MILLER, ARNP

**NOTED ON MOTION CALENDAR:  
DECEMBER 1, 2017**

STIPULATION

The parties, by and through their respective counsel of record and hereby stipulate to the entry of the subjoined order dismissing the following claims:

1. Plaintiff Gohranson's claims for the tort of outrage; and
2. All Plaintiffs' claims against Defendant Dan Miller, A.R.N.P.

1  
2 Dated this 1st day of December, 2017.

3 /s/ Karen D. Moore

4 Kenneth E. Brewes, WSBA No. 9220  
5 Karen D. Moore, WSBA No. 21328  
6 Brewes Layman P.S.  
7 3525 Colby Avenue, Suite 333  
8 P.O. Box 488  
9 Everett, WA 98206-0488  
10 T: (425) 252-5167 / F: (425) 252-9055  
11 kennethb@brewelaw.com  
12 karenm@brewelaw.com  
13 *Attorneys for Plaintiffs*

Dated this 1st day of December, 2017.

/s/ Todd C. Nichols

W. Mitchell Cogdill, WSBA No. 1950  
Todd C. Nichols, WSBA No. 15366  
Mark P. Giuliano, WSBA No. 49871  
Cogdill Nichols Rein Wartelle Andrews  
3232 Rockefeller Ave.  
Everett, WA 98201-4317  
T: (425) 259-6111 / F: (425) 259-6435  
wmc@cnrlaw.com  
toddn@cnrlaw.com  
mgiuliano@cnrlaw.com  
*Attorneys for Plaintiffs*

10 Dated this 1st day of December, 2017.

11 /s/ Mikolaj T. Tempski

12 Mikolaj T. Tempski, WSBA No. 42896  
13 Joseph G. Genster, WSBA No. 14968  
14 Deputy Prosecuting Attorneys  
15 Attorneys for Defendant Snohomish County  
16 Snohomish County Prosecuting Attorney's Office – Civil Division  
17 3000 Rockefeller Ave., M/S 504  
18 Everett, Washington 98201  
19 T: (425) 388-6330 / F: (425) 388-6333  
20 mtempski@snoco.org  
21 jgenster@snoco.org  
22 Attorneys for Defendants Snohomish County, Robert Trenary, Stuart Andrews, M.D., Lauren  
23 Kooiman, Jean Leight, Betty Lusk, Joy Maine, Andrew Fletcher, Rachelle Rose, Robin Otto,  
24 Roxanne Marler, and Dan Miller

21 Dated this 1st day of December, 2017.

22 /s/ Robert D. Lee

23 Robert D. Lee  
24 William H. Walsh  
25 Cozen O'Connor  
26 999 Third Avenue, Suite 1900  
27 Seattle, WA 98104  
(206) 340-1000  
rlee@cozen.com

wwalsh@cozen.com

1 Attorneys for Defendants Gregory Hardy, Sherrise Holland, & Maxim Healthcare Services, Inc.  
2 Dated this 1st day of December, 2017.

3  
4 /s/Petra Ambrose

David W. Silke

Patrick T. Jordan

Petra Ambrose

6 701 5<sup>th</sup> Avenue, Suite 2100

Seattle, WA 98104

(206) 695-5100

(206) 689-2822

dsilke@gordonrees.com

pjordan@gordonrees.com

9 Attorneys for Defendant Cascade Healthcare Services, LLC,

10 Linet Ngete, and Elaine Gravatt

**PROPOSED ORDER**

This matter having come before the Court on the stipulation of the parties, the Court having considered the foregoing stipulation, it is hereby ORDERED, that all of Plaintiff Gohranson's claims for the tort of outrage, as well as any and all claims against Defendant Dan Miller, A.R.N.P., are hereby DISMISSED with prejudice and without an award of costs to any party.

Dated this 6<sup>th</sup> of December, 2017.



The Honorable ROBERT S. LASNIK  
United States District Judge

Presented by:

Presented by:

/s/ Karen D. Moore

Kenneth E. Brewe, WSBA No. 9220  
Karen D. Moore, WSBA No. 21328  
Brewe Layman P.S.  
3525 Colby Avenue, Suite 333  
P.O. Box 488  
Everett, WA 98206-0488  
T: (425) 252-5167 / F: (425) 252-9055  
[kennethb@brewelaw.com](mailto:kennethb@brewelaw.com)  
[karenm@brewelaw.com](mailto:karenm@brewelaw.com)  
*Attorneys for Plaintiffs*

/s/ Todd C. Nichols

W. Mitchell Cogdill, WSBA No. 1950  
Todd C. Nichols, WSBA No. 15366  
Mark P. Giuliano, WSBA No. 49871  
Cogdill Nichols Rein Wartelle Andrews  
3232 Rockefeller Ave.  
Everett, WA 98201-4317  
T: (425) 259-6111 / F: (425) 259-6435  
[wmc@cnrlaw.com](mailto:wmc@cnrlaw.com)  
[toddn@cnrlaw.com](mailto:toddn@cnrlaw.com)  
[mgiuliano@cnrlaw.com](mailto:mgiuliano@cnrlaw.com)  
*Attorneys for Plaintiffs*

Presented by:

/s/ Mikolaj T. Tempski

Mikolaj T. Tempski, WSBA No. 42896  
Joseph G. Genster, WSBA No. 14968  
Deputy Prosecuting Attorneys