

Tiffany Kay Anderson  
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209-625-8587

January 8, 2014

Atty. Kyle Hansen  
STOCKWELL HARRIS  
1545 River Park Drive, Ste. 330  
Sacramento, CA 95815-4616

**RE: Anderson, Tiffany vs. San Joaquin County Mosquito & Vector  
Control District  
Proposed Letter to Dr. Allems and Various Reports**

Dear Atty. Hansen:

I am writing you to first object to the PQME itself. It cannot be held on January 23, 2014, as I believe we have not yet come to a complete agreement as to the documents to be submitted to Dr. Allems. I will providing you with my evidence at the expedited hearing that I have requested. If you insist on writing to Dr. Allems next week, then please read the rest of this letter.

I have now had the opportunity to fully review your letter to me dated December 30 and 31, 2013, as well as the Proposed Letter referenced above. I have the following objections to the content of that proposed letter.

1. You have failed to include the cumulative exposure case number of ADJ9066508 arising on or about 6/1/2004. Please include that information on your cover letter to Dr. Allems. I would ask you to remove the three knee case numbers (ADJ7004221, ADJ7010682, ADJ7004227) unless you would like me to include those documents with my submission to Dr. Allems.
2. I would like for the very first sentence (on your page "2") to specifically state my start date with SJCMVCD, namely April 19, 2004, rather than referring to me as "a long time employee."
3. I would ask that the last sentence of the first paragraph be completely removed as that is not necessary for this exposure examination.

4. I would ask that the first sentence of the second paragraph reflect that I am alleging that my first chemical exposure arose in my second month of employment.
5. Paragraph 5 references my "past general medical condition and/or any pre-existing factors" which I believe includes the medical records at the time of my hiring; these are the Dameron documents that I have repeatedly requested of you (and Attorney Helphrey) and have yet to receive from either of you. If you cannot provide to me and Dr. Allems these 2004 medical records, then I would contend that Dr. Allems will not be able to reach a complete conclusion with incomplete records. In that case, I'd ask that you remove the entire second sentence, if you cannot provide those documents. Those documents should also include all chemicals (and medicines) used at the White Slough facility and especially Formalin. Dr. Allems is an exposure specialist and needs to have these kinds of records, along with the Wastewater handbook, MSDS labels, etc.
6. The sixth sentence of paragraph 5 should be removed entirely as Dr. Allems is an expert in exposure cases and shouldn't be asked to determine if his findings are consistent with those of other examiners, those whose specialty is orthopedics. If you insist on such comparisons, please provide me a list of those specific other examiners that you were referring to in that sentence.
7. Under the paragraph entitled Causation (page 2, paragraph 7?), I'd like to point out to you that your use of the phrase "the available information" seems to suggest that the medical records being provided to Dr. Allems will be incomplete. I have a much larger stack of documents that I will be submitting to Dr. Allems and yet I believe that there are still documents that exist but are missing; documents that you have access to and have not yet provided to me.
8. I would ask you to strike the sentence "Is there evidence of dysfunctional illness behavior?" (bottom of page 2/top of page 3) as beyond Dr. Allems' area of expertise, he is an exposure specialist.
9. As to the Permanent Disability paragraph on page 3, I'd like to for Dr. Allems to make two findings in regard to MMI: one as to the specific exposure right after the June 29, 2011 injury and a second finding as to the cumulative exposure that began in 2004.
10. I'd next object to your page 5 beginning with the Ability to Return to Work heading. I would ask you to not include the (undated) Job Description that you make reference to. I worked from 2004 to 2009 without ever having seen that job description; it makes no mention of the specific physical demands of the Tech 1 position, it is overly vague. It is a document most likely created after my hire date and not necessary to this exposure evaluation. In fact, I request that you delete every paragraph that follows the Ability to Return to Work heading all the way to the end of your letter based upon Dr. Allems being an exposure specialist, not an occupational reintegration specialist.

I will be mailing Dr. Allems a substantial amount of records in addition to those that you're proposing. I do remain unrepresented. The EAMS website stating otherwise is incorrect and will be addressed promptly.

Due to not having received all of the requested documents as referenced above, my position is that the PQME needs to be rescheduled and I am working on that now. My mailing address continues to be correct as it appears at the head of this letter. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tiffany', followed by a long horizontal flourish.

Tiffany Anderson