

Date: February 28, 2014

To: Kyle Hansen

From: Tiffany Anderson

Re: Documents needed before any QME exposure evaluation

Dear Kyle:

Per our verbal agreement and numerous communications, I remain in need of critical records for my upcoming QME evaluation. That QME is set for January 23, 2014. That QME was originally set for October 24, 2013, and reset to 3 months later by your office. The reason for the delay was because your office needed more time to produce the documents that I have requested.

You've promised to furnish these documents to me on at least four separate occasions (in October, twice in November, and again in early December). Despite answering your "relevance" questions and keeping in good contact with you, you and/or your client continues to be unresponsive. As of today's mail, December 17, 2013, I have not received the requested documents.

Since 2009, my repeated efforts to obtain these documents and information from my employer have been ignored, in violation of the law. When I filed my first DWC-1 in 2004, this information should have been given to my medical provider. Keep in mind, I was seen for three (3) exposures within my first year of employment. By law, I have a right to these documents as well as the right to receive medical treatment for these exposures. These documents have been purposely and intentionally withheld from me.

Your office had no problem retaining all my medical records even when they did not pertain to the injury at hand. I am aware of the resources spent in obtaining three private investigators to follow me. I have had 4 conclusive MRI tears to my right knee which resulting in three separate surgeries. As a result I was removed from work, lost my wages & benefits, and ended up with a permanent impairment. Your law office has gone to great lengths to rush me through a legal and medical process that has been traumatic on me. I have four 12" binders filled with medical reports, legal documents and correspondence. I also have another 2.5 binders of QME reports that I do not comprehend. I have already been forced into a partial settlement out of duress. If your office's intention is to tire me out, it's not going to happen.

Based upon this pattern of delay, I will have no choice but to request a hearing before the judge and subpoena the records; You previously assured me that subpoenas would not be necessary to get these documents. It is clear to me that your client is unnecessarily dragging this matter out and as a result should be responsible for paying me my benefits during this needless delay. I am still considered an "employee" of the district (see their website), but I am being denied the right to return to work. My employer/your client will not terminate my employment as a result of the 132-A filing and their sheer negligence that has lead to this matter. AIMS should be paying me TTD's along with providing me ongoing medical treatment. My private insurance has been terminated and AIMS has not paid any benefits for my knee injury of 6/29/2011 or for the subsequent exposure that I have filed.

Your office has an advantage as Workers' Compensation is a difficult process to learn. Compound that with being forced to move twice after recovering from knee surgeries and having my finances cut in half and then cut off completely. I have done all that I can to not to be a victim. I enrolled in school to learn about Workers Compensation law even as I struggled with the symptoms of my exposure. I hired a personal trainer so that I could return to work prior to the June 29, 2011, injury. Since then, I've had to cash out my retirement & savings, and have lowered my living expenses to near-poverty levels.

I am looking forward to the end of all of this. I will not be a victim or accept the dangerous circumstances that were both intentional and negligent on the part of my employer. My employer has a long history of Workers' Compensation claims. My employer has forced good employees out of their jobs. People are not disposable and should not be treated that way.

I am asking you again to provide the documents that I need in advance of that January QME date. I am waiting for the documents to arrive as agreed upon. If you do not comply, I will ask for a hearing before the judge. I have a legal right to all the documents that I have requested. If it's necessary to prove this, we will do this before the judge. My employer knows this is my right, so don't participate in their violation of the law. Thank you in advance for your promptest attention to this matter.

Sincerely,

Tiffany Anderson