

Tiffany Kay Anderson
2 N Avena Avenue
Lodi, CA 95240
209-625-8587

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2015 APR -2 PM 12:19

OFFICE OF INDUSTRIAL RELATIONS
DWC/WCAB

April 2, 2015

Judge McGill
WCAB
31 East Channel Street, Room 344
Stockton, CA 95202

Regarding: Tiffany Anderson vs. San Joaquin County MVCD, AIMS Insurance
(Sacramento), ADJ7004221; ADJ7004227; ADJ7010682; ADJ7976768;
ADJ9066508

Dear Judge McGill:

Plaintiff is not opposed to the next hearing in these matters being turned into an MSC in that Plaintiff wants to move all of these claims along, and asks that the Court set aside sufficient time on its calendar to fully address the parties' efforts.

Enclosed please find the following numbered exhibits that I am submitting now as evidence for my above-referenced claims:

1. District Manager's Memo from 6/3/1998
2. Treatment records provided by the Defense (incomplete), followed by public record showing how the information can be compiled
3. CAL/OSHA Safety Order 3204
4. ATSDR formaldehyde information
5. California EPA's Pesticide Safety Information Series, A1 through A8
6. OSHA Regulations (Standards 29 CFR) 1910.1048 - particularly, Information Provided to the Physician
7. Helphrey/Allems conflict of interest and bias information
8. EPA Formaldehyde - Chronic Effects
9. Code of Federal Regulations Title 21, Section 529.1030 Formalin
10. Toxics Use Reduction Institute study
11. Department of Health and Human Services, Report on Carcinogens
12. OSHA Fact Sheet, Formaldehyde
13. MSDS label, Formalin
14. OSHA Form 300
15. Photos of knee
16. Photos of growth on scalp and lesions on chest and back
17. Documentation of Medical Records (Personal & Workers Comp Providers)
18. Employee Performance Evaluations of Tiffany Anderson
19. Eric Helphrey and Chris Ely Depositions (Note the Helphrey deposition will be submitted only to the court since Defendant has a copy)

- 20. Skelly hearing materials and harassment examples
- 21. Humphrey's College Information
- 22. Financial Losses-Medical
- 23. Photos of location where Plaintiff's injuries occurred

I am respectfully requesting that counsel for Defendant(s) have her clients complete the following table under penalty of perjury and return it to me on or before our next hearing on April 21, 2015:

Question/Request	Yes	No	Why or Why Not	What Steps Were Taken As A Result To Implement This
Prior Request #6 - Have all MSDS labels for chemical treatments at the White Slough facility for 2004 to 2011 been provided to the Plaintiff?				N/A
Prior Request #6 - Was Formalin used at the White Slough facility each year from 2004 to 2011?				N/A
Prior Request #6 - Were all employees who were sent out to the White Slough facility advised beforehand of the chemicals being applied there?				
Prior Request #7 - Do the Defendants acknowledge that the 6/3/1998 Memo Took Effect At The Time Of Its Issuance?				
Prior Request #8 - Do the Defendants acknowledge that the Agricultural and Municipal Waste Water Information binder was not provided to any of Plaintiff's treating				N/A

physicians at the time of her initial appointments?				
Prior Request #9 – Do the Defendants acknowledge that the safety leaflet N-8 published by the CA Dept. of Pesticide Regulation was not provided to any of Plaintiff's treating physicians?				N/A
Prior Request #9 – Do the Defendants acknowledge that the MSDS sheets for chemicals used by the District were not provided to any of Plaintiff's treating physicians?				N/A
Prior Request - Please have the Defendants provide copies of Sub Rosa reports every 30 days, documenting which claim they are reviewing				
New Request #1-Please have the Defendants provide reasoning for each of the claims they have denied, addressing each denied claim individually.				

Going forward, I respectfully request that each of my claims be kept separate, as many of the past discussions and discovery issues have been confusedly bundled together during QME evaluations, discovery, stipulations, correspondence and hearings.

I also respectfully request that sanctions be applied to the Defendants for bad faith efforts, withholding vital information, and intentionally causing undue delay in the review and acceptance of my claims.

Please note I have additional evidence for my claims in digital format, including timesheets, personal journals and Kaiser records that will be submitted in the future.

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SAN JOAQUIN

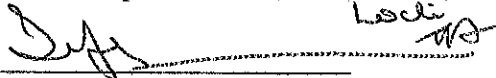
I am in the County of San Joaquin, State of California. I am over the age of 18 years.
My address is 2 N. Avena Avenue, Lodi, CA 95240.

I served the foregoing document described as: Plaintiff's Letter Submitting Exhibits 1-23 dated April 2, 2015, with Enclosures on all parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mailed at Stockton, California, addressed as follows:

Attorney Sara Skolnik
Stockwell, Harris, Woolverton & Muehl
1545 River Park Drive, Suite 330
Sacramento, CA 95815-4616

I certify, under penalty of perjury, that the foregoing is true and correct.

Executed on April 2, 2015, at ~~Stockton~~ Lodi, California.

By: 
Tiffany Anderson