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* CERTIFIED SPECIALIST WORKERS' COMPENSATION LAW
THE STATE BAR OF CALIFORNIA BOARD OF LEGAL SPECIALIZATION
† ALSO LICENSED IN THE STATE OF NEVADA

June 6, 2007

Mr. Adam J. Stewart
Moorad, Clark & Stewart
1020 15th Street, Suite 20
Modesto, CA 95354

RE: MEIDINGER, DONALD VS. SAN JOAQUIN COUNTY MVCD

WCAB NO.: 1) STK 207071
CLAIM NO.: VE0700038
OUR FILE NO.: 300223-001

Dear Mr. Stewart:

Please consider this my **Motion to Quash** regarding notice of taking deposition of Robert Durham and, what I believe was an attempt to set the deposition of Jeanine Finley. However, your deposition notice is defective on its face juxtaposition with the Proof of Service.

Part of this Motion to Quash is based on the fact that we had the deposition of your client, Donald Meidinger, scheduled and calendared while coordinating it with your office. However, your office unilaterally cancelled the deposition less than 24 hours prior to the deposition.

Moreover, your office did not have the professional courtesy to check on my calendar availability for the depositions of Robert Durham and Jeanine Finley.

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WORKERS COMPENSATION
STOCKTON OFFICE

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Please consider this as my offer to meet and confer on this issue. I would be willing to produce the witnesses in Stockton at Garoutte's Court Reporters office assuming that you are willing to produce your client at the same location for a deposition.

Thank you for your attention to this matter.

Very truly yours,

STOCKWELL, HARRIS, WIDOM, WOOLVERTON & MUEHL
A Professional Corporation



ERIC G. HELPHREY

EGH:ks

cc: Ms. Angela Phillips, AIMS Insurance Company
Mr. Robert Durham, San Joaquin County Mosquito & Vector Control Dist.
Ms. Jeanine Finley, San Joaquin County Mosquito & Vector Control Dist.
Workers' Compensation Appeals Board

1 **Meidinger, Donald**

2 **PROOF OF SERVICE**

3 STATE OF CALIFORNIA

4 COUNTY OF SACRAMENTO

5 I am in the County of Sacramento, State of California. I am over the age of 18 years
6 and not a party to the within action. My business address is 1545 River Park Drive, Suite 330,
7 Sacramento, California 95815-4616.

8 On 6/ 11 /2007, I served the foregoing document described as: **Motion to Quash** on
9 all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope
10 with postage thereon fully prepaid in the United States mailed at Sacramento, California,
11 addressed as follows:

12 Mr. Adam J. Stewart
13 Moorad, Clark & Stewart
1020 15th Street, Suite 20 X
Modesto, CA 95354

14 Mr. Robert Durham
15 San Joaquin County MVCD
7759 S. Airport Way
Stockton, CA 95206

16 Ms. Jeanine Finley
17 San Joaquin County MVCD
7759 S. Airport Way
18 Stockton, CA 95206

19 Ms. Angela Phillips
AIMS Insurance Company X
20 P.O. Box 28100
Fresno, CA 93729

21 Workers' Compensation Appeals Board
31 E. Channel Street, Room 344
22 Stockton, CA 95202

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

24 Executed on 6/ 11 /2007, at Sacramento, California.

25
26 By: Kathi Stokes

27 Kathi Stokes
28