



**STOCKWELL  
HARRIS  
WOOLVERTON  
MUEHL**

A Professional Corporation

1545 River Park Drive, Suite 330  
Sacramento, California 95815-4616  
(916) 924-1862  
(916) 924-3541 FAX  
www.shww.com

STEVEN I. HARRIS  
GEORGE WOOLVERTON  
JEFFREY T. LANDRES  
MICHAEL L. TERRY  
EDWARD S. MUEHL  
TED L. HIRSCHBERGER  
LARRY S. MENDELSON  
LINDA S. FREEMAN  
IAN D. PAIGE  
VANESSA L. HENDERSON \*  
JAN P. FUCHS \*  
ERIC G. HELPHREY  
RENEE D. LOGOLISO  
BARRANCE O. ZAKAR \*  
DANIEL J. YSABAL \*  
LISA R. KERNER  
SCOTT T. JELENSKY  
GAIL D. RACKLIFFE  
JOSEPH E. ZUCKERMAN  
KIMBERLY A. HANSEN  
ANNE C. BOBCHICK  
JOHN T. BILLINGSLEA  
ANTHONY CANNIZZO  
PAULA N. HARRIS ††

LISA A. HANHART  
JAMES C. SHIPLEY  
AURORA VASQUEZ  
LISA A. VIDMAR  
GEORGE E. MURPHY  
CAMELIA GAMBOA  
AARON M. PROSIN  
SAMUEL L. TOLVIN  
JAMES R. LAVIN  
HILARY A. McLAUGHLIN  
GEORGE FOGY  
BRIAN D. PEDERSON  
NEDA S. SWEDELSON ††††  
JOHN W. HICKS  
THOMAS P. MOOS  
L. STEVEN HATTENDORF  
FREDERIC J. PHANEUF  
CHRISTIAN M. SANTOS  
SHEILA L. CONWAY  
DALE E. YOUNG \*  
JONATHAN M. FREEMAN  
MARK H. WILLENS †††  
SHERRIE L. MCCracken  
PETER S. KIM

DEREK A. KUHEN  
PAUL S. WOLSEY  
SU TRAN  
JANET ORMOND ANDRIZZI  
EDITTE ALSEN  
JENNIFER L. BOECK ††††  
DEBRA ODOM KUTTNAUER  
STEPHEN L. TURK  
SUSAN G. GEIER  
JENNIFER A. HABER  
SHARON E. DIDION  
ALEXANDER G. ABDOULIN  
STEVEN A. SCHWARTZ  
MICHAEL V. VARON  
TODD E. WHATES  
TODD W. MOBLEY  
WHITNEY DAVIS-HOUSTON  
KEVIN M.T. WHITE  
ANGELA M. SEKI ††††  
MATTHEW B. WOOLVERTON  
MARYAM MIRMAN  
JESSE EVAN KOZMA  
RICHARD K. GREEN †††††  
ROBYN I. KATCHEM

KELLY A. SIECKMAN  
BRENDAN A. O'MELIA  
CARLA F.T. MULLER  
HOWARD K. AU  
MONIQUE PRIDE BROOKS \* †  
HEIDI P. PIERCE ††††††  
EMMANUEL K. NSAHAI \*  
PENNY PAXTON \* †††††††  
SARAH J. JAFFE  
DAVID J. CARASH  
DARLENE EVANS  
JILL M. VEGAS  
ANNETTE KAZANDJIAN  
ALISSA TOBIN ZEA  
JEANNIE M. LACORIO  
KATHLEEN PRUITT  
KIRK J. MORALES  
KIMBERLY S. GASKILL  
EDWARD J. LECLERE  
CHRISTOPHER DEAN WARREN  
KYLE ROBERT HANSEN  
ALEXANDER W. HANSEN

\* CERTIFIED SPECIALIST WORKERS' COMPENSATION LAW THE  
STATE BAR OF CALIFORNIA BOARD OF LEGAL SPECIALIZATION  
† ALSO LICENSED IN THE STATE OF ILLINOIS  
†† ALSO LICENSED IN THE STATE OF NEW YORK  
††† ALSO LICENSED IN WASHINGTON D.C. AND THE STATE OF GEORGIA  
†††† ALSO LICENSED IN THE STATE OF NEVADA  
††††† ALSO LICENSED IN THE STATE OF TEXAS  
†††††† ALSO LICENSED IN THE DISTRICT OF COLUMBIA AND STATE OF WASHINGTON  
††††††† ALSO LICENSED IN THE STATE OF VIRGINIA  
†††††††† ALSO LICENSED IN THE STATE OF PENNSYLVANIA

LIEN SPECIALISTS  
DAVID M. BAUTISTA  
TERA OLDFIELD  
OLIVIA INIGUEZ  
RINA DEL ROSARIO

## **PANEL QUALIFIED MEDICAL EVALUATION** **June 15, 2010 at 9:00 a.m.**

June 11, 2010

Dr. Khosrow Tabaddor  
8221 N. Fresno Street  
Fresno, CA 93720

**RE: ANDERSON, TIFFANY VS. SAN JOAQUIN COUNTY MOSQUITO  
& VECTOR CONTROL**

WCAB NO.: 1) ADJ7004221; 2) ADJ7004227; 3) ADJ7010682  
CLAIM NO.: VE0700184  
OUR FILE NO.: 300141-040

Dear Dr. Tabaddor:

Thank you for agreeing to evaluate the claims of injury filed by Ms. Tiffany Anderson as a State Panel QME. This office represents the interests of San Joaquin County Mosquito & Vector Control and Acclamation Insurance Management Services (AIMS). Ms. Anderson is represented by Ronald M. Stein.

I have enclosed a copy of applicant's deposition transcript dated June 3, 2010 for your review.

**LOS ANGELES OFFICE**  
3580 Wilshire Boulevard, 19<sup>TH</sup> Floor  
Los Angeles, California 90010  
(323) 935-6669

**ORANGE COUNTY OFFICE**  
701 South Parker Street, Suite 2200  
Orange, California 92668-4736  
(714) 479-1180

**SAN DIEGO OFFICE**  
750 "B" Street, Suite 1220  
San Diego, California 92101  
(619) 696-1436

**SAN FRANCISCO OFFICE**  
222 Kearny Street, 9<sup>TH</sup> Floor  
San Francisco, California 94108  
(415) 734-9310

**SAN BERNARDINO OFFICE**  
735 East Carnegie Drive, Suite 270  
San Bernardino, California 92408  
(909) 381-5553

**SAN LUIS OBISPO OFFICE**  
1150 Osos Street, Suite 202  
San Luis Obispo, California 93401-3692  
(805) 541-0440

**VENTURA OFFICE**  
2021 Sperry Avenue, Suite 46  
Ventura, California 93003-7417  
(805) 654-8994

**FRESNO OFFICE**  
1550 East Shaw Avenue, Suite 103  
Fresno, California 93710  
(559) 226-9030



ANDERSON, TIFFANY VS. SAN JOAQUIN COUNTY MOSQUITO & VECTOR CONTROL

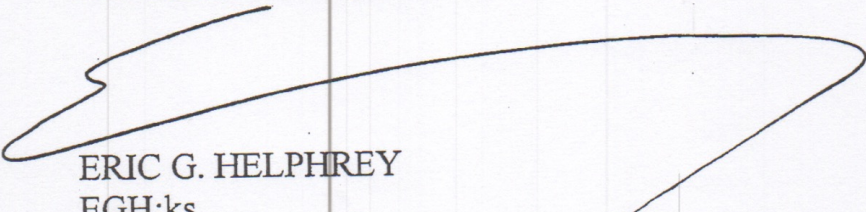
Page 2

June 11, 2010

Your courtesy and cooperation in this matter is greatly appreciated.

Very truly yours,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL  
A Professional Corporation



ERIC G. HELPHREY

EGH:ks

*Enclosures: Deposition Transcript dated June 3, 2010*

cc: Ms. Mackenzie Dawson, AIMS Insurance (without enclosure)  
Mr. Ronald M. Stein, Ronald M. Stein Law Offices (without enclosure)



June 11, 2010

TIFFANY ANDERSON  
2 North Avena Ave.  
Lodi, CA 95242

Re: ANDERSON vs. SAN JOAQUIN COUNTY  
Reference No. 15585 SA

Dear Ms. Anderson:

The original transcript of your deposition in the above-captioned matter, taken on June 3, 2010, is now prepared and filed in our office.

If you wish to review your deposition and sign it, you may do so by calling us at (916) 482-0444 to set up an appointment. Please keep your appointments between the hours of 9:00 a.m. and 4:00 p.m. You have 30 days from the date of this letter to review your deposition.

It is our policy not to release the original deposition, so you may either make an appointment to review the original in our office or read one of the attorneys' copies.

If you do not wish to review your deposition, please sign in the space provided below and return this letter to us.

By: Metro Reporting

\_\_\_\_\_  
TIFFANY ANDERSON

\_\_\_\_\_  
Date

cc: All counsel present



1451 River Park Drive, Suite 275  
Sacramento, CA 95815  
(916) 482-0444  
Fax (916) 482-5712  
metroreporting@sbcglobal.net



EGH  
300141-040

BEFORE THE WORKERS' COMPENSATION APPEALS BOARD  
IN AND FOR THE STATE OF CALIFORNIA

Ms. Tiffany Anderson,

Applicant,

vs.

San Joaquin County MVCD;  
AIMS Insurance (Sacramento),  
Defendants.

No. 1) ADJ7004221;  
2) ADJ7004227;  
3) ADJ7010682

CERTIFIED  
COPY

Deposition of

MS. TIFFANY ANDERSON

Thursday, June 3, 2010

Reported By: Sandy Arnoldy Lewis, CSR #5710



**METRO REPORTING**

1451 River Park Drive, Suite 275  
Sacramento, CA 95815

(916) 482-0444

Fax (916) 482-5712

metroreporting@sbcglobal.net



APPEARANCES

For the Applicant:

RONALD M. STEIN, INC.  
By: CHRISTOPHER WEE  
Attorney at Law  
4521 Quail Lakes Drive  
Stockton, California 95207

For the Defendants:

STOCKWELL, HARRIS, WIDOM,  
WOOLVERTON & MUEHL  
BY: ERIC G. HELPHREY  
Attorney at Law  
1545 River Park Drive, Suite 330  
Sacramento, California 95815

--o0o--



INDEX OF EXAMINATIONS

Mr. Helphrey . . . . . 4

--o0o--

Deponent's Changes or Corrections . . . . . 69

Reporter's Certificate . . . . . 70

--o0o--



1 BE IT REMEMBERED that on Thursday,  
2 June 3, 2010, at the hour of 9:35 a.m., of said  
3 day, at STOCKWELL, HARRIS, WIDOM, WOOLVERTON &  
4 MUEHL, 1545 River Park Drive, Suite 330,  
5 Sacramento, California before me, SANDY ARNOLDY  
6 LEWIS, a Certified Shorthand Reporter, State of  
7 California, there personally appeared MS. TIFFANY  
8 ANDERSON, who was examined as a witness in said  
9 cause.

10 --oOo--

11 MS. TIFFANY ANDERSON,  
12 the Witness, called on behalf of the Defendant,  
13 being duly sworn to state the truth, the whole  
14 truth, and nothing but the truth, testified under  
15 oath as follows:

16 EXAMINATION BY MR. HELPHREY

17 Q. Okay. Ms. Anderson, my name is Eric  
18 Helphrey.

19 A. Hi.

20 Q. And I represent San Joaquin County  
21 Mosquito and Vector Control District regarding your  
22 workers' compensation claim. Okay?

23 A. Okay.

24 Q. I'll just remind you that you're under  
25 oath.



1 A. Okay.

2 Q. Correct?

3 A. Correct.

4 Q. You understand that?

5 A. Yes.

6 Q. And you're obligated to tell the truth?

7 A. Yes.

8 Q. Okay. And if you don't understand a  
9 question in which I've asked, please ask me to  
10 clarify.

11 A. Okay.

12 Q. And try to avoid nods of the head and  
13 "uh-huhs" and "huh-uhs." "Yes" or "no" with an  
14 explanation if appropriate works the best. Okay?

15 A. Okay.

16 Q. If you need to take a break, let me know.

17 A. Okay.

18 Q. Okay. Let's get started.

19 Can you please provide me your full legal  
20 name?

21 A. Tiffany K. Anderson.

22 Q. Have you been known by any other last  
23 names?

24 A. Tiffany K. Ebel. I'm sorry, you want the  
25 last name. Ebel, E-B-E-L.



1 Q. Okay. When did you use that last name or  
2 what period of time?

3 A. When I was born 'til I was 18.

4 Q. Okay. Then Anderson is a married name?

5 A. Correct. I like that one better.

6 Q. Which one do you like better?

7 A. Anderson.

8 Q. Okay. And date of birth 8-22-70?

9 A. Yes. Correct.

10 Q. Okay. Where were you born?

11 A. Lodi.

12 Q. Okay. Social Security number?

13 A. 549-23-5133.

14 Q. Are you currently taking any medications?

15 A. I am.

16 Q. What?

17 A. I'm taking -- do you want the bottle  
18 because I would --

19 Q. Whatever works the best.

20 A. Okay. I am taking hydrocodone 7.5 325,  
21 two a day. I am taking Alprazolam .5 milligrams.  
22 It's prescribed four times a day if I choose to  
23 take so. Do you want my supplements?

24 Q. Any other prescribed medications?

25 A. Not at this time.



1 Q. At any time in the last six months?

2 A. Ibuprofen 800 milligrams.

3 Q. Okay. Any other prescribed medications?

4 A. Not -- no.

5 Q. Is the same doctor prescribing your  
6 medications?

7 A. No.

8 Q. Which doctor is prescribing the hydro --

9 A. Dr. --

10 Q. -- hydrocodone?

11 A. Dr. Gary Murata.

12 Q. He's prescribing the hydrocodone?

13 A. Correct.

14 Q. And the other?

15 A. Jasti.

16 Q. How do you spell the doctor's last name?

17 A. J-A-S-T-I.

18 Q. First name?

19 A. I could not pronounce it if you asked me  
20 to.

21 Q. Male or female?

22 A. Female.

23 Q. Where is Jasti located?

24 A. Kaiser.

25 Q. Which Kaiser?



1 A. In Stockton.

2 Q. Okay. Where are your prescriptions  
3 filled? Kaiser, I presume, for the Kaiser?

4 A. Correct. Safeway.

5 Q. Which Safeway?

6 A. Safeway on Kettleman Lane.

7 Q. What town?

8 A. Lodi.

9 Q. Okay. Thanks. All right. Has your  
10 deposition ever been taken before at any time in  
11 your life?

12 A. No.

13 Q. Okay. Your current physical address,  
14 please?

15 2 North Avena Avenue, Lodi, California  
16 95240.

17 Q. Okay. How long have you resided there?

18 A. Since January of this year.

19 Q. Who else resides with you there?

20 A. Mary Jean Parvin, which is my second or  
21 third cousin.

22 Q. Anyone else?

23 A. My cats.

24 Q. Any other humans?

25 A. No.



1 Q. Okay. Mary Jean is how old approximately?

2 A. Boy --

3 Q. Approximately.

4 A. Between 60 and 70.

5 Q. Okay. Where did you reside prior to 2  
6 North Avenue?

7 A. Avena. A-V-E-N-A, Avena Avenue.

8 Q. In what town are we in?

9 A. Lodi.

10 MR. WEE: Hold on just a second. The  
11 Avena address is the current one. Then you asked  
12 her about a North Avenue address.

13 Q. BY MR. HELPHREY: I'm sorry. So the  
14 2 North Avena --

15 A. Avenue.

16 Q. -- you currently reside --

17 A. Correct.

18 Q. -- from January?

19 Then where did you reside prior to that?

20 A. 1516 Sylvan Way.

21 Q. What town?

22 A. Lodi.

23 Q. All right. How long have you resided in  
24 the greater Lodi area?

25 A. All my life. Okay. Except I went to Job



1 Corps in Sacramento for a year, and I lived in  
2 Stockton for one year of my life.

3 Q. When were you in Stockton?

4 A. I was in Stockton, I think, when I was 16.  
5 Fifteen, 16.

6 Q. Okay. So basically since age 18, save  
7 maybe the one year, you've been in the greater Lodi  
8 area?

9 A. Correct.

10 Q. Okay. Any convictions for any crimes?

11 A. Not yet.

12 Q. Okay. Any military experience?

13 A. No.

14 Q. College?

15 A. Some.

16 Q. College degrees?

17 A. Not yet.

18 Q. Okay. Are you attending college?

19 A. College certificate. Yes.

20 Q. Where are you attending college?

21 A. Humphreys in Stockton.

22 Q. Okay. How far along are you?

23 A. My first quarter. I have some units  
24 transferred from Delta College.

25 Q. Okay. High school in Lodi, I presume?



1 A. I -- I received my G.E.D. at Sacramento  
2 Job Corps.

3 Q. All right. Children?

4 A. Two. They're young adults now.

5 Q. How old are they?

6 A. My son is 21 and my daughter is 19.

7 Q. And they don't live with you then?

8 A. No.

9 Q. Okay. Where does the son live?

10 A. My -- my son has resided in Ventura until  
11 this last weekend. He now is spending at least two  
12 weeks in Sebastopol, which is a commune, and he  
13 will decide how long he wants to stay there and  
14 whether they will accept him, and then he plans on  
15 returning to Lodi to finish college.

16 Q. What's your son's name?

17 A. Benjamin Alexander Anderson.

18 Q. How about the daughter's name, please?

19 A. Amanda Elizabeth Anderson.

20 Q. Where does she reside?

21 A. I can't give you the physical address, but  
22 I can tell you she lives in Lodi.

23 Q. Okay.

24 A. And she lives --

25 MR. WEE: That's okay. Just answer the



1 question.

2 THE WITNESS: She lives in Lodi.

3 Q. BY MR. HELPHREY: Thank you.

4 Have you filed for any type of  
5 unemployment benefits in the last five years?

6 A. No.

7 Q. Have you filed for any Medicare benefits  
8 through the Federal Government?

9 A. No.

10 Q. Have you filed for any type of Social  
11 Security benefits through the Federal Government?

12 A. No.

13 Q. Have you ever filed for any type of  
14 federal disability benefit such as --

15 A. No.

16 Q. -- through Veterans Affairs?

17 A. No.

18 Q. How about state disability benefits --

19 A. No.

20 Q. -- such as through E --

21 A. Sorry.

22 Q. So state disability benefits such as  
23 through EDD?

24 A. No.

25 Q. Now, it looks like you might have made



1 some type of request from San Joaquin County  
2 Employee Retirement System; is that correct?

3 A. What I was trying to do was purchase back  
4 my retirement. I'm five months away shy of being  
5 vested.

6 Q. So where are you with that process then?

7 A. Their policy, if I remember it correctly,  
8 is while I'm not working, I would have to pay it in  
9 full in order to purchase it. I do not have that  
10 ability, so if I return to work, then they will  
11 take payments from me through my paycheck. And I  
12 was starting that process prior to my, whatever,  
13 injury. You would have the dates.

14 Q. Okay. Besides your employment with the  
15 Mosquito and Vector Control District, have you had  
16 any other employment that might add to this  
17 retirement?

18 A. Only if I purchased it back and that would  
19 be the City of Lodi.

20 Q. But there haven't been other agencies  
21 outside of the Mosquito and Vector Control  
22 District?

23 A. I withdrew from those. I no longer have  
24 them, if you're asking me if I have them available  
25 to me, or are you asking me if I --



1 Q. Let me go --

2 A. Okay.

3 Q. We may come back to that.

4 A. Okay.

5 Q. Have you filed for any type of formal  
6 retirement?

7 A. I -- I'm sorry, but I don't understand  
8 because I understand retirement to mean that you're  
9 62 years old and that you have the right to file  
10 for retirement and I'm not 62. So I don't  
11 understand the question.

12 Q. Well, forget what you may or may not  
13 understand. But have you formally filed for any  
14 type of retirement?

15 A. Wait a minute. I have a -- no, I don't  
16 understand you, so it's not a simple question. I  
17 have a 401(k) that I withdrew. Is that what you're  
18 asking me?

19 Q. I'm sorry. Let me try it again. I'm not  
20 trying to trick you. I'm just curious, sometimes  
21 people file for retirement prior to age 62.

22 A. Okay.

23 Q. So I'm just curious if you did that, for  
24 example, through San Joaquin County Employer  
25 Retirement System?



1 A. No.

2 Q. Okay. Is there any agency where you may  
3 have filed for retirement even though you're not  
4 62?

5 A. I withdrew my 401(k) that I had invested  
6 in as a hardship.

7 Q. No. I understand. Okay. I think the  
8 answer is -- I think I have the answer that I need.

9 MR. WEE: He's asking about retirement  
10 systems, like a Social Security system or a county  
11 retirement system, but that doesn't --

12 THE WITNESS: No.

13 MR. WEE: -- appear to be the case here.

14 THE WITNESS: No.

15 MR. HELPHREY: Okay.

16 THE WITNESS: Not that I'm aware of.

17 MR. WEE: That's a fair answer.

18 Q. BY MR. HELPHREY: Let's move on.

19 You're currently employed by San Joaquin  
20 County Mosquito and Vector Control District, right?

21 A. Correct.

22 Q. And you were hired in 2004; is that  
23 correct?

24 A. 4-19, if I remember correctly.

25 Q. All right. And since April 19th, 2004,



1 have you worked for anybody else?

2 A. I -- I worked at a voting poll so like a  
3 one-day shot.

4 Q. Besides the one-day voting poll, have you  
5 worked for anyone else since April 19th, 2004?

6 A. I don't think so. No, I -- no.

7 Q. When was the one-day voting poll?

8 A. It was for Obama's election.

9 Q. Okay. So --

10 A. Can't tell you the date, but --

11 Q. Did you injure yourself during that one  
12 day?

13 A. No.

14 Q. Okay. What county were you in?

15 A. San Joaquin County.

16 Q. Okay. Did you have employment prior to  
17 the district?

18 A. Yes, tons.

19 Q. We'll get into that.

20 A. All right.

21 Q. So who did you work with immediately prior  
22 to San Joaquin County?

23 A. City of Lodi Public Library.

24 Q. Were you --

25 A. I was a library aid.



1 Q. Okay. Were you an employee of the City of  
2 Lodi?

3 A. Correct.

4 Q. What was the period of that employment?

5 A. It was one year. I can't give you dates.  
6 They actually kept me on the -- they kept me on the  
7 call list to -- that I could come back and work  
8 while I was employed for mosquito abatement, but I  
9 never did.

10 Q. So was it approximately 2003 to 2004?

11 A. Approximately. While I was working for  
12 the library, the same period of time I also worked  
13 at Twin Arbors Athletic Club as a front desk clerk.

14 Q. That's Spare Time?

15 A. Correct.

16 Q. The only reason I'm smirking is I took a  
17 deposition yesterday and I heard the same thing  
18 from somebody else, but anyways --

19 A. And I also worked at the --

20 Q. Hold on. So with Lodi you were a library  
21 assistant?

22 A. Library aid.

23 Q. Aid?

24 A. Yes.

25 Q. Was it a part-time job?



1 A. Yes.

2 Q. Okay. Did you injure yourself at all?

3 A. No.

4 Q. Did you file any workers' compensation  
5 claims --

6 A. No, no.

7 Q. Let me just get the question -- I know  
8 you're totally anticipating what my question is,  
9 but if you can just allow me to ask the question in  
10 full --

11 A. Sure.

12 Q. And you're doing it right now, too. It's  
13 okay. It's all right. If you look at the  
14 transcript that's being created -- and it's  
15 perfectly natural to anticipate what my question  
16 is, and I sometimes stutter and I pause, but I'll  
17 try to get the question out in full and then you'll  
18 respond. Then when we go back and look at the  
19 transcript, it will be more clear as to what was  
20 said and what was asked and how it was answered.  
21 Okay?

22 A. Okay.

23 Q. So did you file any workers' compensation  
24 claims with Lodi library?

25 A. No.



1 Q. Did you ever seek any medical treatment  
2 because of anything that may have occurred with  
3 Lodi library?

4 A. Not that I remember.

5 Q. Okay. Then you were also working for  
6 Spare Time at the front desk, correct?

7 A. Correct.

8 Q. What period of time was that employment?

9 A. Same period of time as the library.

10 Q. '03 to '04 approximately?

11 A. Correct.

12 Q. Part time?

13 A. Correct.

14 Q. Any workers' compensation claims that you  
15 may have filed with them?

16 A. No.

17 Q. Any on-the-job injuries that resulted in  
18 you needing to seek medical treatment?

19 A. No.

20 Q. All right. You had another job roughly at  
21 the same period of time?

22 A. Correct.

23 Q. Who was that with?

24 A. UPS.

25 Q. UPS?



1 A. UPS.

2 Q. Out of what location?

3 A. Stockton location."

4 Q. Any on-the-job injuries?

5 A. No.

6 Q. File any workers --

7 A. No.

8 MR. WEE: Wait.

9 THE WITNESS: Sorry. I'm so sorry.

10 Q. BY MR. HELPHREY: So did you file any  
11 workers' compensation claims?

12 A. No.

13 Q. Okay. What was the rough period of  
14 employment with UPS?

15 A. Two months around the holiday season. So  
16 from like October to December.

17 Q. Okay. Why did that job end?

18 A. It was seasonal.

19 Q. Okay. How about the Spare Time job?

20 A. I was hired at mosquito abatement and able  
21 to seek full-time employment, which is what I was  
22 looking for.

23 Q. Why did the library job end?

24 A. Same reason.

25 Q. Okay. Did you have work prior to the



1 three that we just talked about?

2 A. Yes.

3 Q. With whom?

4 A. Yes.

5 Q. With whom?

6 A. With whom?

7 Q. We're going to try to work our way back  
8 chronologically.

9 A. Two years I home schooled. Do you want to  
10 know that?

11 Q. You home schooled your kids or --

12 A. Correct.

13 Q. -- someone else's kids?

14 A. My children.

15 Q. Okay. Did you have employment with anyone  
16 else during that two-year period of time?

17 A. I tried to self employ through selling  
18 nutrients and Mary Kay and go to school.

19 Q. Okay. Mary Kay. Was there an  
20 organization or company for the nutrients?

21 A. It was Reliv.

22 Q. Reliv?

23 A. Correct.

24 Q. Any injuries with Mary Kay?

25 A. No.



1 Q. Any injuries with Reliv?

2 A. No.

3 Q. You file any claims against Mary Kay?

4 A. No.

5 Q. Any claims against Reliv?

6 A. No.

7 Q. Okay. How about prior to that, were you  
8 employed?

9 A. Yes. Rite Aid, which -- gosh, what was it  
10 before it was Rite Aid? They hired me under one  
11 title, and then they switched over to Rite Aid  
12 shortly after. I don't remember.

13 Q. When you last worked there, it was Rite  
14 Aid, though?

15 A. Correct.

16 Q. What location?

17 A. Lodi Avenue.

18 Q. In Lodi, California?

19 A. Yeah. I'm a small-town girl.

20 Q. What was the period of employment with the  
21 pharmacy or drugstore, however you want to call  
22 them?

23 A. Gosh, I can't remember.

24 Q. Approximately.

25 A. Approximately six to nine months.



1 Q. All right. Why did that employment end?

2 A. To home school my children.

3 Q. Okay. Any on-the-job injuries?

4 A. No.

5 Q. Seek any medical treatment because of  
6 anything that happened --

7 A. No.

8 Q. -- with Rite Aid?

9 A. No.

10 Q. Did you work for anybody else during the  
11 same time you worked for Rite Aid?

12 A. I can't remember.

13 Q. Did you have any other employment around  
14 the same period of time?

15 A. I think the next job that we would go to  
16 would be Century Christian School.

17 Q. What town are we in?

18 A. Lodi.

19 Q. How long?

20 A. Two years. Two school years.

21 Q. What did you do?

22 A. I was a teacher's assistant, kindergarten.

23 Q. Okay. What year are we approximately  
24 now?

25 A. I think we're at '94 to '96, but I --



1 Q. Approximately?

2 A. Yeah.

3 Q. That's fair. So it was Rite Aid then '96,  
4 '97-ish?

5 A. Something. I honestly don't know. I  
6 could sit down and write it out for you, but I'm  
7 trying to go off my memory.

8 MR. HELPHREY: Well, do you want to allow  
9 her time so it might make things quicker? You tell  
10 me.

11 MR. WEE: No, why don't we just go through  
12 this. I don't know how far back you want to go.  
13 She'll testify to the best of her ability.

14 Q. BY MR. HELPHREY: Okay. All right. So  
15 we've got '03-ish was Lodi library, Twin Arbors?

16 A. That's pretty concrete there.

17 Q. Okay. Then UPS around the same time?

18 A. That's concrete, yes.

19 Q. So then you were home schooling your kids,  
20 would it be two years immediately prior to that?

21 A. Yes, yes.

22 Q. So that would be roughly 2000, 2002; is  
23 that fair to say?

24 A. Yes.

25 Q. Okay. So then we've got Rite Aid for



1 about a year. Actually, I have six to nine months,  
2 so we'll just round off. So that would have been  
3 late 1990; is that approximately correct?

4 A. That's approximately correct.

5 Q. Okay. Because then we go to -- then the  
6 Century Christian School you were thinking '94,  
7 '96, so that leaves a few years gap there.

8 A. I home schooled for two years.

9 Q. In between Rite Aid and Century or --

10 A. Yes. Immediately when I left Century  
11 Christian School, I -- I quit that job to home  
12 school.

13 Q. Okay. Then from there you went to Rite  
14 Aid?

15 A. Correct.

16 Q. Okay. That probably fills the gap there.  
17 So what about prior to the Christian school?

18 A. I worked for Albertson's grocery store.

19 Q. All right. For what period of time?

20 A. I want to say '93. Around '92.

21 Q. For how long?

22 A. I worked there for five years.

23 Q. So '92 to '96, seven-ish?

24 A. No, that's too late. Maybe it was -- my  
25 son -- okay. My son was born in '89.



1 Q. What year did you graduate from high  
2 school?

3 A. What year? '87. Should have graduated in  
4 '88. I received my G.E.D. in '87. My graduating  
5 year was '88.

6 Q. Okay. So did you have a job around '87,  
7 '88?

8 A. I worked for Olan Mills.

9 Q. Doing what?

10 A. Front desk.

11 Q. Okay. Any injuries with them?

12 A. No.

13 Q. How long were you there?

14 A. About nine months to a year.

15 Q. Full time?

16 A. Yeah, it was full time.

17 Q. Where? Lodi?

18 A. Lodi.

19 Q. Then where from there?

20 A. I did a paper route for Stockton Record so  
21 I could be home with my kids.

22 Q. Injure yourself?

23 A. No.

24 Q. File any workers' compensation claims --

25 A. No.



1 Q. -- with the Stockton Record?

2 A. Sorry. No.

3 Q. And then where did you go? To  
4 Albertson's?

5 A. To Albertson's.

6 Q. Okay. Did you sustain any on-the-job  
7 injuries with Albertson's?

8 A. No.

9 Q. Did you seek any medical treatment because  
10 of any event that happened at Albertson's?

11 A. No.

12 Q. Albertson's is located?

13 A. I started on Kettleman Lane in Lodi for  
14 two and a half years, and then I transferred to  
15 Stockton on Pacific and Alpine for two and a half  
16 years.

17 Q. Okay. So maybe '90 to '95 was  
18 Albertson's; is that fair?

19 MR. WEE: You can give an approximate  
20 answer, if you think that's reasonably close.

21 Q. BY MR. HELPHREY: I'm just trying to put  
22 your high school -- you know, the kids and all that  
23 into perspective.

24 A. I'm trying to think. My son was born in  
25 '89. I think my son was about two years old when I



1 started working at Albertson's, and I know I was  
2 out of there by the time he was in first grade,  
3 so --

4 MR. WEE: Do you need anything more  
5 specific?

6 THE WITNESS: '93. I believe I started at  
7 Albertson's in '92, '93, and I was there for five  
8 years, I know that much.

9 Q. BY MR. HELPHREY: Okay. What were you  
10 doing there?

11 A. I did a vast array of things. I started  
12 in the bakery/deli for two and a half years. The  
13 other two and a half years I worked for the meat  
14 department and I ran my own department.

15 Q. Okay. All right. Besides filing a  
16 workers' compensation claim with San Joaquin County  
17 Mosquito and Vector Control District, have you ever  
18 filed any other workers' compensation claims with  
19 any other employers?

20 A. No.

21 Q. Have you ever sustained any on-the-job  
22 injuries with anyone else besides the Mosquito and  
23 Vector Control District?

24 A. No.

25 Q. Did you ever seek medical treatment



1 because of anything that happened with any other  
2 employers?

3 A. Besides colds or flus with my own sick  
4 leave, no.

5 Q. Okay. Any injuries performing any  
6 volunteer work for anyone?

7 A. No.

8 Q. Okay. In terms of source of income from  
9 April 2004 to the present, has it either come from  
10 the Mosquito and Vector Control District or the one  
11 day of working at the polls?

12 A. Yes.

13 Q. No other sources of income from April 2004  
14 to the present?

15 A. I have received other income besides  
16 mosquito abatement.

17 Q. From whom?

18 A. My ex-husband.

19 Q. Okay. That's spousal support or child  
20 support?

21 A. Correct.

22 Q. Save that, any other income you may have  
23 received?

24 A. I cashed out my retirements.

25 Q. Okay. Any other sources of income?



1 A. Not that I am aware of.

2 Q. Okay. Do you remember the date of injury  
3 with the Mosquito and Vector Control District from  
4 which your workers' compensation benefits have been  
5 flowing?

6 MR. WEE: I'm sorry, are you asking her to  
7 tell upon which claim the carrier is paying  
8 benefits?

9 Q. BY MR. HELPHREY: Well, I'm trying to sort  
10 out the dates. So how many injuries have you had  
11 with mosquito -- we'll just call them the district.  
12 Okay?

13 A. Yeah.

14 Q. Do you understand if I say district? With  
15 the district as relates to your right knee?

16 A. I believe three.

17 Q. Okay. And when was the first injury?

18 A. I believe 6-19 of 2008. Do not quote me  
19 on that.

20 Q. I'm not doing any quoting.

21 Okay. What was the injury event?

22 A. I tore my lateral meniscus.

23 Q. What happened resulting in you tearing  
24 your meniscus? Were you stepping up? Were you  
25 stepping down? What physical activity?



1 A. I was pelleting a pasture.

2 Q. So were you walking then?

3 A. I was walking. I was climbing up and down  
4 off of the truck to load it with pesticide.

5 Q. Was there a specific event that happened,  
6 or was it more just a combination of events on that  
7 day?

8 A. I can tell you I went to work with no  
9 injury, and I can tell you by the end of the day my  
10 knee swelled and started to hurt, and that's what I  
11 know. And then I can tell you the series of events  
12 I did on that day.

13 Q. So prior to 6-19-2008, in other words,  
14 6-17-2008, was your right knee bothering you?

15 A. No.

16 Q. Any swelling?

17 A. No.

18 Q. Had you ever had any like or similar  
19 symptoms to your right knee --

20 A. No.

21 Q. -- prior?

22 A. No.

23 Q. Okay. So after you finished working on  
24 the 19th, you noticed your knee was swelling?

25 A. Yes.



1 Q. Painful?  
2 A. Yes.  
3 Q. Okay. Did you miss any time from work?  
4 A. I believe I missed six months from work.  
5 Q. Okay. Did you have surgery after that  
6 particular injury?  
7 A. Yes.  
8 Q. Okay. When was the surgery?  
9 A. Oh, man.  
10 Q. Approximately.  
11 A. The injury was 6-19. In September? Does  
12 that sound right? I honestly do not know.  
13 Q. Who did the surgery?  
14 A. Dr. Gary Murata.  
15 Q. Okay. After the surgery were you able at  
16 some point in time to return back to work?  
17 A. I returned back to work 1 of 2009.  
18 Estimate date. It was January of 2009.  
19 Q. Okay. Were you working full duty at the  
20 time?  
21 A. I was.  
22 Q. How long did you continue working full  
23 duty?  
24 A. Until March of 2009.  
25 Q. So for about three months?



1 A. Correct.

2 Q. Then what happened?

3 A. I had another inflammation or swelling of  
4 the knee.

5 Q. Was there some specific event that  
6 happened?

7 A. I can tell you what I was doing on the  
8 job.

9 Q. Sometimes people tell me they remember --  
10 okay. Go ahead and tell me what you remember.

11 A. I -- that week I was on a brushing crew,  
12 and we were required to move tree limbs and  
13 branches out of a steep incline where water would  
14 surface where -- I'm sorry. You don't probably  
15 know what we do for a living, so --

16 Q. I'm just trying to get a general -- you  
17 were out in the field doing field-type work; is  
18 that fair to say?

19 A. Yes. But we have a vast array of field  
20 work.

21 Q. Right. Okay. Anyway, so on 3-26-09,  
22 March 26, 2009, you're out in the field, and you  
23 notice that your knee is bothering you again after  
24 you finish your shift?

25 A. It was hurting -- it just started to



1 swell.

2 Q. Okay.

3 A. That's been the biggest indication, it  
4 swells.

5 Q. Okay. Did you go back to work the next  
6 day?

7 A. I do not believe so. I do not remember.

8 Q. Okay. Did you take any significant amount  
9 of time off after March 26, 2009?

10 A. I believe that I had a scheduled  
11 appointment with Dr. Murata that following week,  
12 and I returned to Dr. Murata and he looked at my  
13 knee and put me on modified duty again.

14 Q. How long were you on modified duty?

15 A. I returned to work, I want to say, in June  
16 of 2009. So from 3 -- 3 of 2009 until 6 of 2009, I  
17 went back to physical therapy. I had another MRI  
18 and I returned --

19 MR. WEE: I'm sorry. He's not asking any  
20 of that.

21 THE WITNESS: Okay.

22 MR. WEE: Listen carefully to his  
23 question.

24 THE WITNESS: To what he's asking.

25 MR. WEE: Yes. You want to repeat the



1 question.  
2 Q. BY MR. HELPHREY: Sure. So March 26,  
3 2009, you're out doing the brushing work, if you  
4 will?  
5 A. Yes.  
6 Q. Brushing crew?  
7 A. Right.  
8 Q. Your knee swells. Within a week of that,  
9 you're seeing your treater, correct?  
10 A. Correct.  
11 Q. He put you on modified duty, correct?  
12 A. Correct.  
13 Q. Do you work modified duty then for  
14 approximately three months?  
15 A. No. My employer does not allow modified  
16 duty.  
17 Q. So you did not do modified work?  
18 A. Correct.  
19 Q. Okay. So you were off work completely for  
20 about three months?  
21 A. Correct.  
22 Q. Okay. Then you returned back to full duty  
23 in June of 2009?  
24 A. Correct.  
25 Q. Okay. Then did you continue working full



1 duty?  
2 A. When I returned?  
3 Q. Well, June 2009 you're back at full duty,  
4 correct?  
5 A. Correct.  
6 Q. Did anything else happen after that?  
7 A. Again my knee.  
8 Q. When approximately?  
9 A. It was the weekend before the 4th of  
10 July.  
11 Q. What activity were you doing?  
12 A. I was treating a pasture.  
13 Q. You were whating a pasture?  
14 A. I'm sorry, I was applying pesticide to a  
15 pasture.  
16 Q. Okay. Let's go over your general job  
17 responsibilities with the district.  
18 A. Okay.  
19 Q. What is your job title, first of all?  
20 A. Pesticide applicator or a Tech I.  
21 Q. Okay. Has that been your job since you  
22 were hired in 2004?  
23 A. Yes.  
24 Q. Okay. How much are you paid?  
25 A. Around \$23 an hour.



1 Q. Do you typically work 40 hours a week?  
2 A. It's seasonal. In the winter we work 40  
3 hours a week. In the summer we work 60 hours a  
4 week. It's all dependent on the climate, the  
5 temperature.  
6 Q. Are you approximating it's 60 hours a  
7 week?  
8 A. I'm sorry?  
9 Q. Are you approximating the 60 hours a  
10 week?  
11 A. I'm approximating, yes. It's all  
12 dependent on the elements.  
13 Q. So you go to an office, my understanding,  
14 or district location, correct, when you start your  
15 shift?  
16 A. Yes.  
17 Q. Then you don or put on mosquito abatement  
18 clothing?  
19 A. Yes.  
20 Q. And then basically you're out in the field  
21 for most of the shift; is that fair to say?  
22 A. Yes.  
23 Q. Okay. Are you required to carry anything?  
24 A. Yes.  
25 Q. Okay. Like what would you carry?



1 A. Flashlights, buckets, bags of pesticide,  
2 hand cans, our protective gear, goggles.

3 Q. Okay. So on the week before the 4th of  
4 July of last year, right, you're out in the field  
5 again doing mosquito abatement work, correct?

6 A. Doing my -- my field assignments.

7 Q. Okay. You just notice your knee swelling  
8 again; is that what happened?

9 A. Yes.

10 Q. Okay. And it was pain in your knee?

11 A. Swelling and pain.

12 Q. Okay. It's the right knee?

13 A. It is the right knee.

14 Q. Okay. Has your left knee ever bothered  
15 you with the district?

16 A. It -- it seemed like it -- I had some  
17 compensational pain in the first injury, but when I  
18 went to physical therapy and started building the  
19 muscles, that went away.

20 Q. So your left knee hasn't bothered you for  
21 at least a year then?

22 A. Yeah. No, my left knee is pretty good.

23 Q. So did you have another surgery then?

24 A. Yes, I have.

25 Q. It's the second meniscus repair; is that



1 correct?

2 A. That is correct.

3 Q. Okay. And my records show it was in March  
4 of this year; is that correct?

5 A. That sounds -- that sounds right.

6 Q. Okay. What's your current status? Have  
7 you returned back to full duty?

8 A. No.

9 Q. Are you still treating with Dr. Murata?

10 A. I am.

11 Q. When was the last time you saw  
12 Dr. Murata?

13 A. Estimated three weeks ago.

14 Q. What did he tell you then?

15 A. "I'll see you in four weeks."

16 Q. What type of active treatment is he  
17 providing?

18 A. Physical therapy.

19 Q. Okay. How often are you going to PT?

20 A. I have a -- a six-visit authorization, and  
21 I -- I was attending every two weeks. This week I  
22 made an exception with this deposition, and I have  
23 not gone this week.

24 Q. Okay.

25 A. It's a prescription of six visits, however



1 I see fit to schedule them.

2 Q. Okay. So on this March 2009 claim, when  
3 did you first report an injury to the district?

4 A. July -- I want to say it's the 1st, but  
5 you can't quote me on that. I -- my knee was  
6 swelling. It was hurting and field demands were  
7 pretty high.

8 MR. WEE: Hang on a second. He's asking  
9 you when you reported it.

10 THE WITNESS: I don't know how to answer  
11 that. I -- I went to my assistant manager and  
12 asked him if he could relent on my job duties  
13 because my knee was hurting and was there any way  
14 they could accommodate me.

15 Q. BY MR. HELPHREY: Just is there an  
16 approximate date that you remember first telling  
17 somebody at the district?

18 A. That was July 1st.

19 Q. Okay.

20 MR. WEE: In other words, just so I'm  
21 clear, was that the same as the date that your knee  
22 was swelling?

23 THE WITNESS: Yes.

24 MR. WEE: Okay.

25 THE WITNESS: My knee was starting to



1 hurt.

2 MR. WEE: Whether it was July 1st or some  
3 other date?

4 THE WITNESS: I'm pretty sure that was the  
5 date.

6 MR. WEE: Okay.

7 Q. BY MR. HELPHREY: Okay. I may have  
8 confused you. As it relates to the March, because  
9 you said your knee was swelling in March --

10 MR. WEE: Well, hang on a second. This  
11 last time was the first weekend of July.

12 MR. HELPHREY: I understand.

13 Q. So there's three claims is my  
14 understanding. There's a June 19th, 2008. Then  
15 there's a March 26, 2009. And then the last one  
16 being the July 2nd, 2009. So I was going to the  
17 middle one, which would have been the March, and  
18 that's what I was curious as to when you first  
19 reported an injury to the district employer,  
20 supervisor, as it relates to the middle injury in  
21 March?

22 A. I don't remember.

23 Q. Okay. Would it have been the same day,  
24 within a week, two weeks?

25 MR. WEE: Well, hang on a second, though.



1 She stated that she doesn't remember. If you know  
2 it at all and can give an approximate answer,  
3 that's fine, but if you really don't know, just say  
4 you don't know.

5 THE WITNESS: Within one week.

6 Q. BY MR. HELPHREY: Okay. Who would you  
7 have told?

8 A. Dr. Murata.

9 Q. Okay. Did you --

10 MR. WEE: I'm sorry, that doesn't really  
11 answer the question.

12 MR. HELPHREY: I'm going to clean it up.

13 MR. WEE: Okay.

14 Q. BY MR. HELPHREY: So within one week did  
15 you also tell your employer that you had --

16 A. I don't remember what I told my  
17 employer.

18 Q. Okay. Do you remember ever telling anyone  
19 at the district regarding your March 26, 2009,  
20 incident?

21 A. I -- I communicated things to them. I  
22 communicated that my knee was hurting. I wore -- I  
23 believe I wore the brace. At that time my knee --

24 Q. All I'm just trying to do is get the  
25 factual information. I'm not trying to make a



1 right or wrong determination.

2 A. I can't answer your question then.

3 Q. That's fair. So you have no recollection  
4 if you did tell the employer --

5 A. I have no recollection.

6 Q. Let me just ask the question, please. So  
7 do you remember ever telling anyone at the district  
8 that you injured your knee on March 26, 2009?

9 A. I do not remember.

10 Q. Okay. Do you remember ever telling anyone  
11 at the district regarding your third injury --

12 A. Yes.

13 Q. -- in July --

14 A. Sorry.

15 Q. That's all right. July 2nd, 2009?

16 A. Maybe I should take a break.

17 Q. That's fine. We can totally --

18 A. Maybe I should just take a break. Yeah, I  
19 think so.

20 MR. HELPHREY: That's fine. I can take a  
21 break.

22 (Break was taken.)

23 Q. BY MR. HELPHREY: All right. Let's go  
24 back to the middle injury if we can.

25 A. Sure.



1 Q. 3-26. So you reported to Murata within a  
2 week; is that correct, approximately?

3 A. Yes.

4 Q. Okay. Since we took the break, I frankly  
5 can't remember, you said you missed some time from  
6 work after that as well?

7 A. After what?

8 Q. After the March 26, 2009?

9 A. Yes.

10 Q. How much time did you miss?

11 A. Approximately three months.

12 Q. Okay. And the treatment that you had  
13 during that period of time consisted of?

14 A. Physical therapy.

15 Q. All right. I'm sorry, my pen is now out  
16 of ink. I'll be right back. Sometimes we stop the  
17 depo when my pen runs out of ink.

18 (Brief break was taken.)

19 Q. BY MR. HELPHREY: All right. Three months  
20 off; treatment with Murata and physical therapy,  
21 correct?

22 A. Correct.

23 Q. All right. You returned back to work for  
24 how long prior to the -- I show it as a July 2nd,  
25 2009, injury. How long had you returned back to



1 work prior to that?

2 A. Approximately a couple months.

3 Q. Okay. It's not a math quiz either. So it  
4 was March 26th, and I have the advantage of looking  
5 at all these numbers, and your attorney is so mean  
6 that he won't give me a piece of paper to write  
7 things down. No, I'm just teasing.

8 So I show it as March 26th, 2009, right,  
9 the middle injury, correct?

10 A. Correct.

11 Q. Then you're off for about three months you  
12 believe?

13 A. Two months.

14 Q. Okay. So two months would put us to --

15 A. March, April, May.

16 Q. Right. End of May, first of June.

17 MR. WEE: That's okay. Just give your  
18 best approximate answer.

19 THE WITNESS: Okay. I returned for two  
20 months.

21 Q. BY MR. HELPHREY: Okay. Were you working  
22 full duty during those --

23 A. Yes.

24 Q. -- field operations, if you will, the tech  
25 work that we talked about? You're out in the



1 field?

2 A. Yes.

3 Q. Abating mosquitos?

4 A. Yes.

5 Q. Okay. All right. So this incident that  
6 happened before the 4th of July -- again, I'm  
7 showing it as the 2nd and that's how it's been pled  
8 by your attorney -- did you report that to anyone  
9 at the district?

10 A. Yes.

11 Q. Who did you report it to?

12 A. Eddie Lucchesi.

13 Q. When did you tell Eddie you had hurt your  
14 knee in July of 2009?

15 A. I believe it to be the 1st.

16 Q. Okay.

17 A. And it was a request more than a -- more  
18 than a complaint.

19 Q. What was the request or what did you tell  
20 him? Whether it's a request or complaint, what did  
21 you tell him?

22 A. Can you lower the demands at work, the  
23 physical demands.

24 Q. Did you tell him that you had hurt your  
25 knee?



1 A. Yes. He was fully aware that my knee was  
2 hurt.

3 Q. Okay. How did you tell him that you hurt  
4 your knee? What did you tell him?

5 A. My -- the gist. "My knee is swelling up.  
6 Can you relent on the work, or do I need to go back  
7 and see my doctor?"

8 Q. Did you tell him that something happened  
9 on July 2nd, 2009?

10 A. No. I -- I -- what's the question?

11 MR. WEE: Are you asking if she reported a  
12 specific incident occurred to her knee?

13 Q. BY MR. HELPHREY: Did you go see a treater  
14 then after the incident happened in July of 2009?

15 A. Hold on a minute. Ask me that question  
16 again.

17 Q. Did you go see Dr. Murata or anyone else  
18 after the July 2009 swelling occurred?

19 A. Yes.

20 Q. Okay. That was Dr. Murata that you saw?

21 A. Yes.

22 Q. Okay. Do you remember what you told him?

23 A. My knee hurts. It's swollen.

24 Q. Did you tell him that your knee hurt from  
25 some work-related activity?



1 MR. WEE: If you remember.

2 THE WITNESS: I don't remember.

3 Q. BY MR. HELPHREY: Okay. That's fair.

4 All right. So you had surgery, the second  
5 surgery, the meniscus repair, in March?

6 A. Okay.

7 Q. 2010, correct?

8 A. Okay.

9 Q. Since then -- well, actually, where are we  
10 now? We're June? All right. You're wondering if  
11 I actually passed the Bar.

12 A. No, I'm not.

13 Q. So in the last month, has your knee  
14 swollen at all?

15 A. My knee is swollen.

16 Q. Every day for the last month?

17 A. No. It depends on what I'm doing.

18 Q. Okay. Have you noticed any loss of range  
19 of motion in the last --

20 A. No.

21 Q. -- in the last month?

22 A. No.

23 Q. Okay. So you have full range of motion;  
24 is that fair to say?

25 A. I believe that I do.



1 Q. Okay. Do you have pain every day over the  
2 last month?

3 A. It ranges. I -- yes, but I've gone  
4 without pain this month through physical therapy.

5 Q. Okay. So as it relates to your knee in  
6 the last month, your symptoms have been swelling  
7 and pain on some days? And I'm not trying to  
8 minimize the pain.

9 A. Sure.

10 Q. But pain, it's not every day?

11 A. I'm getting better. I am getting better,  
12 if that's what you're asking me.

13 Q. Yes, okay. Good.

14 Has the doctor given you an idea when he  
15 anticipates you'll fully recover or reach a  
16 medical -- there are all these weird terms that we  
17 use in our business -- that you stabilized where  
18 you don't have to continue the active treatment?

19 A. He does not know. He does not know, but  
20 we tentatively hoped that I could return to work in  
21 the next two weeks when I finished physical  
22 therapy.

23 Q. Okay.

24 A. That's my hope.

25 Q. Okay. Do you use a knee brace?



1 A. No. They're not good for you.

2 Q. Let's talk about nonwork-related events,  
3 injuries, and that kind of stuff. Okay?

4 A. Okay.

5 Q. I kind of asked you this question, but let  
6 me just ask again. Have you ever had a  
7 nonwork-related injury to your right knee?

8 A. No.

9 Q. Okay. Have you ever sought any medical  
10 treatment because of something that was not related  
11 to a work injury as it relates to your right knee?  
12 Do you want me to ask that --

13 A. I have not had an injury to my right knee  
14 prior to this incident.

15 Q. So no injury. How about any medical  
16 treatment ever to your right knee that wasn't  
17 related to a workers' compensation claim with the  
18 district?

19 A. No.

20 Q. Okay. What about any injury to your left  
21 knee?

22 A. No.

23 Q. Any medical treatment to your left knee?

24 A. No.

25 Q. Any kind of orthopedic injuries in your



1 life that was not work-related?

2 A. Yes.

3 Q. Like what?

4 A. I sprained -- and I can't tell you which  
5 one it was -- one of my ankles.

6 Q. When?

7 A. I think I was about 22, 23.

8 Q. All right. What were you doing?

9 A. My husband was chasing me and he was  
10 acting like he was going to get me and I was  
11 running from him. And there was a hole in the  
12 ground, and my knee -- or not my knee, but my ankle  
13 snapped.

14 Q. Did you seek medical treatment?

15 A. Yes.

16 Q. Where?

17 A. At Kaiser in Stockton.

18 Q. Thank you. Does your ankle continue to  
19 bother you today?

20 A. No.

21 Q. How long did it bother you after that  
22 incident?

23 A. I don't remember, but I was working for  
24 Albertson's, so I returned back to work.

25 Q. Did you miss any time from work at



1 Albertson's?

2 A. I don't remember.

3 Q. Okay.

4 A. It wasn't work-related.

5 Q. Did you have to have a cast, surgery,  
6 splint, anything like that?

7 A. Probably a splint. That was so long ago.

8 Q. Well, in geological time that wasn't that  
9 long ago. Any other orthopedic-type injury  
10 events?

11 A. No.

12 Q. All right. Any other orthopedic  
13 nonwork-related treatment?

14 A. Can you define that?

15 Q. Any treatment for a nonwork-related  
16 orthopedic injury, such as back, shoulder, ankles,  
17 neck?

18 A. Chiropractor.

19 Q. Okay. Have you seen more than one  
20 chiropractor in your life?

21 A. Yes, I have.

22 Q. Okay. How many chiropractors?

23 A. I think two.

24 Q. When was the first time you sought  
25 chiropractic treatment?



1 A. Oh, boy, '92.  
2 Q. Okay. For how long?  
3 A. Probably two visits.  
4 Q. Lodi?  
5 A. Yes.  
6 Q. What doctor?  
7 A. Kevin Stewart.  
8 Q. Evan?  
9 A. Kevin.  
10 Q. Kevin. What body part?  
11 A. My neck.  
12 Q. Was there an injury event?  
13 A. I have arthritis in my neck.  
14 Q. Okay.  
15 A. That's what he told me.  
16 Q. So two visits?  
17 A. Yeah, about two visits, yeah.  
18 Q. Then the second chiropractor that you  
19 saw?  
20 A. What is this guy's name? I can't remember  
21 his name. He's in Lodi. I could probably look on  
22 my cell phone and I think that he's still on there.  
23 Q. Is your attorney going to allow you to do  
24 that?  
25 A. I don't know.



1 MR. WEE: That's fine with me if you want  
2 to.

3 THE WITNESS: He was the nicest man. You  
4 think I'd remember, but it's been quite a few years  
5 since I've seen him, so -- contacts?

6 Girard. Dr. Girard.

7 Q. How do you spell the last name?

8 A. G-I-R-A-R-D.

9 Q. When was the last time you saw  
10 Dr. Girard?

11 A. I want to say -- let me think about this  
12 for just a minute. 2006.

13 Q. When did you first start seeing him?

14 A. 2005.

15 Q. Okay. Approximately how many times have  
16 you visited with him?

17 A. Probably about -- this is an estimate.  
18 Fifteen, 16 times.

19 Q. And what body parts?

20 A. My neck.

21 Q. Neck only?

22 A. Neck. Neck, shoulders. Neck and  
23 shoulders.

24 Q. Neck, shoulders?

25 A. Yes.



1 Q. Anything else?

2 A. Not my knee.

3 Q. Okay. No right knee?

4 A. No, no.

5 Q. Okay. Any other chiropractors you've  
6 seen?

7 A. No, not that I can remember.

8 Q. All right. Any other orthopedic-related  
9 treatment that was not related to your workers'  
10 compensation injuries that we haven't already  
11 talked about?

12 A. No, not that I can --

13 Q. Any hip issues?

14 A. No.

15 Q. Other ankles injuries?

16 A. No, no.

17 Q. Any low back problems?

18 A. No.

19 Q. Any car accidents?

20 A. No.

21 Q. Any like slip-and-fall injury events  
22 outside of your job?

23 A. No.

24 Q. Any injuries around the house?

25 A. No.



1 Q. I'm just going to ask you a series of  
2 standardized questions just so you know.

3 A. Okay.

4 Q. Any sport-related injuries?

5 A. No.

6 Q. Any injuries pursuing recreational  
7 activities, like tennis or cycling or whatever,  
8 basketball?

9 A. No.

10 Q. Whatever you'd be interested in. Any  
11 surgeries in your life?

12 A. I gave birth to two children.

13 Q. Besides that?

14 A. I don't think so.

15 Q. Have you ever been diagnosed with  
16 arthritis in your knees?

17 A. No.

18 Q. Have you ever filed a lawsuit because of  
19 any type of personal injury to yourself?

20 A. No.

21 Q. So besides the knee surgeries and the  
22 birth of your two children, any hospitalizations?

23 A. No.

24 Q. No?

25 A. No.



1 Q. Okay.

2 A. I have to think about this stuff, but  
3 no.

4 Q. I understand. Your family doctor is  
5 through whom?

6 A. Kaiser.

7 Q. Is that Stockton?

8 A. Correct.

9 Q. Have you been to any other Kaiser  
10 locations?

11 A. I don't think so.

12 Q. Okay. Ever at Kaiser South Sacto?

13 A. No.

14 Q. Your children were born at Kaiser in  
15 Stockton?

16 A. No. My children were born -- one was born  
17 at Lodi Memorial and the other was born at -- I  
18 don't know what it's called. Lodi Community.

19 Q. Okay. How long has Kaiser been your  
20 family medical provider?

21 A. When I started my employment with mosquito  
22 abatement. Then there was a lapse and prior to  
23 that when I worked for Albertson's.

24 Q. Okay. How about in between Albertson's  
25 and the district?



1 A. Didn't necessarily go to the doctor.  
2 Q. Did you have a family doc?  
3 A. No.  
4 Q. No?  
5 A. No.  
6 Q. Did you have health insurance?  
7 A. Yes.  
8 Q. Through whom?  
9 A. Lodi Fire Department, City of Lodi.  
10 Q. Lodi Fire Department. There probably was  
11 some type of -- do you remember who the actual  
12 insurance provider was?  
13 A. No, because I didn't use it.  
14 Q. Your husband is a member of --  
15 A. My ex-husband.  
16 Q. Your ex-husband, pardon me, is a --  
17 A. Was a member.  
18 Q. Okay. Is he still a fireman?  
19 A. As of today he is. He just got hired back  
20 about three months ago. Not with Lodi.  
21 Q. Okay. What about nonwork-related  
22 activities? What things are you interested in?  
23 Gym?  
24 A. I love -- I do, I love the gym.  
25 Q. Okay. Is that Spare Time gym?



1 A. Yes.

2 Q. Are you a member there?

3 A. Yes.

4 Q. Twain Harte, is that --

5 A. Twin Arbors.

6 Q. Twin Arbors. What type of activities have  
7 you done there over the last couple of months, for  
8 example?

9 A. The last couple months I did -- I rode the  
10 bicycle, rode the elliptical. Done a few weights.

11 Q. Okay. Like what type of -- lower body,  
12 upper body, both?

13 A. I've tried to strengthen my legs. I've  
14 tried to mimic what I've been doing in physical  
15 therapy.

16 Q. So lower extremity and upper extremity on  
17 the weights?

18 A. Not so much the arms after the surgery.

19 Q. Okay. On the bike, is that like a spin  
20 bike or more of a stationary bike?

21 A. It's a recumbent.

22 Q. Recumbent. All right. How much time can  
23 you spend on the bike?

24 A. Attention span-wise, no more than about 30  
25 minutes.



1 Q. Are you taking any classes at the gym?

2 A. I -- I took a Pilate's.

3 Q. Just one time in the last couple months?

4 A. In the last couple months I went, I think,  
5 just to one class.

6 Q. Okay. Any other classes?

7 A. Not -- not since this surgery.

8 Q. Okay. What other type of activities in  
9 the last couple months?

10 A. I've been attending school.

11 Q. Okay. What other physical activities, if  
12 you will, like hiking, tennis, cycling, that kind  
13 of stuff?

14 A. Since my surgery? This last surgery?

15 Q. Yes.

16 A. Okay. Let me think about that. Pretty  
17 much what we described. Shopping and not like --  
18 not like -- just shopping, like grocery shopping.

19 Q. Okay.

20 A. Okay.

21 Q. Are you able to do work around the house?

22 A. Yes.

23 Q. Clean your house?

24 A. I clean my house.

25 Q. I don't know, do you vacuum, dust?



1 A. Yes.

2 Q. Okay. Is there like a garden or

3 anything?

4 A. No. We have a gardener.

5 Q. So no outside gardening?

6 A. I attempted one day to pull weeds out of

7 the yard. It didn't last long.

8 Q. Okay. When you're at the gym, though, is

9 your knee bothering you at all at the lower

10 extremity weights and recumbent bike and that kind

11 of stuff?

12 A. There is a residual when I'm finished, but

13 when I'm working out, it feels good.

14 Q. What other kind of hobbies do you have

15 besides the gym?

16 A. I like to read.

17 Q. What else?

18 A. I spend a lot of time with my family.

19 Q. I'm kind of looking for --

20 A. Physical activities?

21 Q. Yeah.

22 A. I don't do much, I'm sorry. I don't have

23 a lot of money. I don't do a lot of things. I'm

24 going to school. I go to the gym. I haven't been

25 walking. And I used to be an avid walker, but I



1 haven't been walking. I do the basic necessities.  
2 Grocery shop, clean my house, spend time with my  
3 family. That's what I've done in the past three or  
4 four months.

5 Q. Any overnight travels since your last  
6 surgery?

7 A. Yes, yes.

8 Q. Where?

9 A. Cupertino.

10 Q. How long or how many times? One time?

11 A. No. Probably three or four times.

12 Q. Okay. What do you do when you go to  
13 Cupertino?

14 A. I visit my boyfriend.

15 Q. Okay. Do you guys go out hiking, cycling,  
16 stuff like that?

17 A. We go out to eat. We go to movies. We do  
18 not have common interests, so those are about the  
19 two that --

20 Q. Are there any physical activities you do  
21 when you go to Cupertino, like outdoor-type  
22 activities?

23 A. We went for one walk. We walked to a  
24 restaurant.

25 Q. Okay.



1 A. That was probably about two weeks ago.

2 Q. Any other overnight travels since your  
3 surgery?

4 A. Last night I stayed at my  
5 ex-mother-in-law's house in Roseville.

6 Q. Because of the depo?

7 A. Yeah, yeah.

8 Q. Any other overnight travels since your  
9 second surgery?

10 A. Not that I can think of.

11 Q. Okay. You moved to the north -- what was  
12 the address again? I got it wrong the first time.

13 A. 15 -- wait.

14 Q. Where are you currently living? On  
15 North -- what is it called, North Avena Avenue?

16 A. Uh-huh.

17 Q. I can't see anymore. You did that in  
18 January?

19 A. Yes. December-ish, January.

20 Q. Was that a self move?

21 A. I -- I did not physically move my personal  
22 belongings, but, yes, I moved.

23 Q. Okay. But you weren't physically active  
24 in any of the moving of anything?

25 A. I moved my clothing, like from hangers.



1 All the boxes, all the furniture I had people move  
2 for me.

3 Q. Like who helped you?

4 A. Let me see. My son. My -- my boyfriend.

5 Q. What is his name?

6 A. Robert Blewett.

7 Q. Robert what?

8 A. Blewett, B-L-E-W-E-T-T.

9 Q. Anyone else help?

10 A. This will be ironic, but a work comp  
11 private eye, he was my neighbor, and his name is  
12 John Atencio and his brother.

13 Q. He's a work -- what is he?

14 A. He's a work comp private eye.

15 Q. Like an investigator?

16 A. Uh-huh.

17 Q. He wasn't investigating you, was he?

18 A. I don't -- you tell me.

19 Q. Not that I know of.

20 A. I thought it was a bit strange, but, you  
21 know, you just got to go with it.

22 Q. Well, how did that happen?

23 A. He moved -- I lived on Sylvan Way in the  
24 apartments. He lived upstairs from me. He moved  
25 in probably four months before I moved. And we



1 became friends and he's a nice guy.

2 Q. What's his last name?

3 A. Atencio.

4 Q. Who does he work for? Do you know?

5 A. I -- I don't. Does Private Eagle or -- I  
6 don't know.

7 Q. I never heard of Private Eagle.

8 MR. HELPHREY: Have you?

9 MR. WEE: (Nodding head.)

10 Q. BY MR. HELPHREY: So has he told you all  
11 kind of horror stories about work comp?

12 A. He told me -- he told me a few things  
13 to -- you know, that they'll sit at your  
14 appointments and follow and see where you go after  
15 you leave the doctor's office. But he told me a  
16 funny story if you're interested.

17 Q. Sure.

18 A. Okay. He was recording somebody playing  
19 tennis, and he put the recorder down in the bushes.  
20 And the gentleman was playing tennis, and John  
21 walked around the block to just let the recorder  
22 record, and a little dog came up and kicked his leg  
23 up over his recorder and urinated on his camera,  
24 so --

25 Q. That's what he gets for leaving his camera



1 on a man.

2 Okay. You're able to drive, I presume?

3 A. Yes.

4 Q. Okay. Is the apartment on the first  
5 floor? Are there multiple floors where you live?  
6 Is it a house where you live?

7 A. It's a house.

8 Q. Okay. Is it one floor?

9 A. Yes.

10 Q. Okay. Are you able to go upstairs if you  
11 have to go upstairs?

12 A. I pretty much think I can do anything.  
13 It's just I don't know what the ramifications will  
14 be when I'm done.

15 Q. All right. Any other hobbies or interests  
16 or recreational activities that you have that we  
17 haven't talked about?

18 A. Are you talking physical or just in  
19 general?

20 Q. In general. General and/or physical.

21 A. I hate to tell you this, but I'm just a  
22 boring person. I love my family. I like to read.  
23 I like to walk. I like to exercise. If I had  
24 money, I'd probably do a lot of shopping, but that  
25 doesn't happen. I like to go to church. Small



1 town. Small mind. Don't know what to tell you.

2 Q. Music, photography?

3 A. Love music.

4 Q. Do you go to concerts, that kind of  
5 stuff?

6 A. I went to a concert. Okay. I went to a  
7 concert -- what was the concert? It was at the  
8 Asparagus Festival, and it was Lover Boy.

9 Q. They're still around, huh?

10 A. It was good. It was good.

11 MR. HELPHREY: I think I'm about done with  
12 the Lover Boy. That pretty much would conclude any  
13 deposition.

14 Do you have anything, sir?

15 MR. WEE: I don't have any questions.

16 MR. HELPHREY: Okay. I'm done. Thanks.

17 MR. WEE: Okay. We're finished.

18 (The deposition was concluded at 11:03 a.m.)  
19  
20

21 --oOo--  
22  
23  
24  
25



1 Please be advised I have read the  
2 foregoing deposition, pages 1 through 67,  
3 inclusive.

4 I hereby state there are:

(check one) \_\_\_\_\_ no corrections  
\_\_\_\_\_ corrections per

5  
6 \_\_\_\_\_  
TIFFANY ANDERSON

7  
8  
9  
10  
11 --o0o--  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25



WITNESS'S CHANGES OR CORRECTIONS

NOTE: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "Add" or "Delete" and sign this form.

Deposition of: TIFFANY ANDERSON

Case-Title: ANDERSON vs. SAN JOAQUIN COUNTY

Date of Deposition: June 3, 2010

I, \_\_\_\_\_, have the following corrections to make to my deposition:

Page	Line	Change/Add/Delete
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____



STATE OF CALIFORNIA

ss

COUNTY OF SACRAMENTO

REPORTER'S CERTIFICATE

I certify that the witness in the foregoing deposition,

TIFFANY ANDERSON

was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein named; that the testimony of said witness was reported by me, a duly certified shorthand reporter and a disinterested person, and was thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand on June 11, 2010.

**CERTIFIED  
COPY**

---

SANDY ARNOLDY LEWIS, CSR 5710  
State of California



**SAN JOAQUIN COUNTY  
MOSQUITO VECTOR  
CONTROL DISTRICT**

# Memo

**To:** Anderson, Tiffany  
**From:** Emily Nicholas  
**CC:**  
**Date:** June 21, 2010  
**Re:** Cost of Living adjustment

---

Effective 7/1/10, a cost of living adjustment of 2.5% will be implemented. Your biweekly gross pay will be \$2,041.10, and the hourly rate \$25.5138,

Thanks and any questions, please call Emily 982-4675.