

1 Sara A. Skolnik (SBN: 267324)  
2 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**  
3 **A Professional Corporation**  
4 1545 River Park Drive, Suite 330  
5 Sacramento, California 95815-4616  
6 (916) 924-1862  
7 (916) 924-3541 Fax  
8 Attorneys for Defendant

9  
10 BEFORE THE WORKERS' COMPENSATION APPEALS BOARD  
11 OF THE STATE OF CALIFORNIA  
12

13 Tiffany Anderson, ) WCAB No.: 1) ADJ7004221; 2) ADJ7004227;  
14 ) 3) ADJ7010682; 4) ADJ7976768;  
15 Applicant, ) 5) ADJ9066508  
16 vs. )  
17 ) **PETITION TO COMPEL ATTENDANCE**  
18 San Joaquin County MVCD; AIMS Insurance ) **AT PQME EVALUATION**  
19 (Sacramento), )  
20 )  
21 Defendant. )

22 COMES NOW, defendant, San Joaquin County Mosquito and Vector Control and  
23 Acclamation Insurance Management Services (AIMS), by and through its attorney of  
24 record, Stockwell, Harris, Woolverton & Muehl, and hereby petitions the Workers'  
25 Compensation Appeals Board for an order compelling the applicant to attend her PQME  
26 re-evaluation scheduled for September 21, 2015 at 4:00 p.m. with Dr. Tabaddor. In  
27 support of this Petition, defendant alleges the following:

28 1. The applicant was scheduled to be re-evaluated by Dr. Tabaddor for a  
Petition to Reopen on October 13, 2014.

2. An Information and Assistance Conference was held on October 3, 2014.  
At that conference and as memorialized by the Information and Assistance Officer,  
applicant agreed that she would attend the re-evaluation.



1           3.     An informal conference was then set for October 7, 2014 with Judge  
2 McGill. However, the applicant failed to attend.

3           4.     On October 13, 2014 Dr. Tabaddor's office was advised that the applicant  
4 did appear for the evaluation but refused to let Dr. Tabaddor evaluate her and left the  
5 appointment.

6           5.     Defendant then re-scheduled the evaluation to January 5, 2015. Defendant  
7 petitioned for an Order Compelling and such was granted by Judge McGill by way of an  
8 Order served on 1/5/15.

9           6.     The applicant applied for and obtained an Order Staying the proceeding  
10 which issued on 1/9/15.

11          7.     Defendant has now re-scheduled the re-evaluation to September 21, 2015,  
12 and hereby reinstates its Petition to Compel the applicant's attendance at same. (Please  
13 see QME appointment notification form attached hereto.)

14          WHEREFORE, defendant respectfully requests that this Board issue an Order  
15 Compelling applicant to attend the re-evaluation with Dr. Tabaddor scheduled for  
16 September 21, 2015 at 4:00 p.m.

17  
18 Dated: July 9, 2015

Respectfully submitted,

19                   **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**  
20                   A Professional Corporation

21                   \_\_\_\_\_  
Sara A. Skolnik

22          cc:     **Please see Proof of Service/Verification**  
23  
24  
25  
26  
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1  
2  
3 BEFORE THE WORKERS' COMPENSATION APPEALS BOARD  
4 OF THE STATE OF CALIFORNIA  
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6

7 Tiffany Anderson,

8 Applicant,  
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vs.

10 San Joaquin County MVCD; AIMS Insurance )  
11 (Sacramento), )  
12 )  
13 Defendant. )  
14

) WCAB No.: 1) ADJ7004221; 2) ADJ7004227;  
) 3) ADJ7010682; 4) ADJ7976768;  
) 5) ADJ9066508

) **ORDER COMPELLING APPLICANT'S**  
) **ATTENDANCE AT PQME EVALUATION**

15 Pursuant to defendant's Petition to Compel applicant's attendance at the PQME re-  
16 evaluation, and good cause appearing,

17 IT IS ORDERED that applicant, Tiffany Anderson, present herself for a re-  
18 evaluation with Dr. Tabaddor on September 21, 2015 at 4:00 p.m. at 333 San Carlos  
19 Way, Suite B, Stockton, California 95207.  
20

21 Dated: \_\_\_\_\_

22 WORKERS' COMPENSATION JUDGE  
23  
24  
25  
26  
27  
28



Uniform Assigned Name: STOCKWELL HARRIS SACRAMENTO  
EAMS Administrator Name: KALIE WIKEL  
EAMS Administrator's Phone: (916) 924-1862  
EAMS Administrator's Email: Kalie\_Wikel@shww.com

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

WCAB NO.: 1) ADJ7004221; 2) ADJ7004227; 3)  
ADJ7010682; 4) ADJ7976768; 5) ADJ9066508  
CLAIM NO.: VE0700184  
OUR FILE NO.: 300141-040

**VERIFICATION**

**STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

I have read the foregoing **PETITION TO COMPEL ATTENDANCE AT PQME EVALUATION  
AND PROPOSED ORDER** and know its contents.

☒ I am one of the attorneys for a party to this action. I am informed and believe and on that ground  
allege that the matters stated in the foregoing document are true.

Executed on July 10, 2015, at Sacramento, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and  
correct.

  
SARA SKOLNIK

**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

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

On July 10, 2015, I served the foregoing document described as: **PETITION TO COMPEL  
ATTENDANCE AT PQME EVALUATION AND PROPOSED ORDER** on all interested 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 Sacramento, California, addressed as follows:

Workers' Compensation Appeals Board (Stockton)  
31 E. Channel Street, Room 344  
Stockton, CA 95202  
\*E-FILE\*



Uniform Assigned Name: STOCKWELL HARRIS SACRAMENTO  
EAMS Administrator Name: KALIE WIKEL  
EAMS Administrator's Phone: (916) 924-1862  
EAMS Administrator's Email: Kalie\_Wikel@shww.com

ARS Legal  
13925 Whittier Boulevard  
Whittier, CA 90605

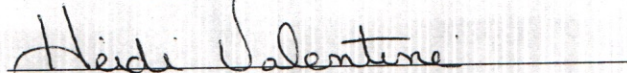
Mr. David Gutierrez  
AIMS Insurance (Sacramento)  
P.O. Box 269120  
Sacramento, CA 95826-9120

Ms. Tiffany Anderson  
2 N. Avena Ave  
Lodi, CA 95240

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

Executed on July 10, 2015, at Sacramento, California.

By:



Heidi Valentine



PROOF OF SERVICE BY MAIL

I, Melissa Santo, certify that the following is true and correct:

I am employed in the city of Stockton, and county of San Joaquin, California. I am over the age of eighteen years, and am not a party to the within entitled cause.

My business address is 31 E. Channel Street #344, Stockton, California 95202. On 1/9/15, I served the ORDER STAYING PROCEEDINGS; ORDER GRANTING CONTINUANCE ( ADJ7004221; ADJ7004227; ADJ9066508; ADJ7976768; ADJ7010682) by causing true copies thereof, enclosed in sealed envelopes with postage thereon fully prepaid, to be placed in the United States Post Office mail box at Stockton, California, addressed to the following parties:

ACCLAMATION SACRAMENTO	Insurance Company, PO BOX 269120 SACRAMENTO CA 95826
STOCKWELL HARRIS SACRAMENTO	Law Firm, 1545 RIVER PARK DR STE 330 SACRAMENTO CA 95815, KALIE_WIKEL@SHWW.COM
TIFFANY ANDERSON	Injured Worker, 2 N AVENA AVE LODI CA 95242
ARS LEGAL WHITTIER	Lien Claimant, 13925 WHITTIER BLVD WHITTIER CA 90605, michelle.castillo@arslegal.com
CHRISTOPHER ELEY STOCKTON	Law Firm, 343 E MAIN ST STE 710 STOCKTON CA 95202, ELEYLAW@GMAIL.COM

I am readily familiar with the business practice at my place of business for collection and processing of correspondence for delivery by mail. Correspondence so collected and processed is deposited with the United States Postal Service on the same day in the ordinary course of business. On the above date, the said envelopes were collected for the United States Postal Service following ordinary business practices.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on 1/9/2015 at Stockton, California.

