

1 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**

2 **A Professional Corporation**
1545 River Park Drive, Suite 330
3 Sacramento, California 95815-4616
(916) 924-1862
4 (916) 924-3541 Fax

5 Attorneys for Defendant

6
7 **BEFORE THE WORKERS' COMPENSATION APPEALS BOARD**
8 **OF THE STATE OF CALIFORNIA**

9
10 Ms. Tiffany Anderson) WCAB No.: 1) ADJ7004221; 2) ADJ7004227;
11) 3) ADJ7010682; 4) ADJ7976768
12 Applicant,)
13 vs.) **OBJECTION TO DECLARATION OF**
14 San Joaquin County MVCD; AIMS Insurance) **READINESS TO PROCEED**
(Sacramento))
15 Defendant.)

16 COMES NOW, defendant, San Joaquin County, Mosquito in Vector
17 Control District, and AMES Insurance, by and through its attorney of record,
18 Stockwell, Harris, Woolverton & Muehl, and objects to the Declaration of
19 Readiness to Proceed filed by the applicant on July 12, 2012.

20 Defendant objects on the grounds that discovery is incomplete at this
21 time. The parties did have a meeting with the Information Assistance Officer on
22 July 12, 2012, at which time, applicant was informed that defendant would be
23 seeking a supplemental report from Dr. Tabaddor.
24


25 While defendant does not object to the matter proceeding to a Status
26 Conference on whether or not Dr. Tabaddor should remain as the Panel QME,
27 defendant requests that the matter be set only on that issue and that discovery
28 remain open at this time.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: July 23, 2012

Respectfully submitted,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL
A Professional Corporation



Kyle R. Hansen

STOCKWELL HARRIS SACRAMENTO
KALIE WIKEL
(916) 924-1862
Kalie_Wikel@shww.com

1 RE: Anderson, Tiffany vs. San Joaquin County Mosquito & Vector Control (ADJ7004221)

2 VERIFICATION

3 STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

4 I have read the foregoing **OBJECTION TO DECLARATION OF READINESS TO PROCEED** and
know its contents.

5 CHECK APPLICABLE PARAGRAPHS


6 I am a party to this action. The matters stated in the foregoing document are true of my own
knowledge except as to those matters which are stated on information and belief, and as to those matters I believe
7 them to be true.

8 I am an Officer a partner a _____ of _____, a party to this
action, and am authorized to make this verification for and on its behalf, and I make this verification for that
reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document
9 are true. The matters stated in the foregoing document are true of my own knowledge, except as to those
matters which are stated on information and belief, and as to those matters I believe them to be true.

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

12 Executed on July 24, 2012, at Sacramento, California.

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

14 
15 Kyle Hansen

16 PROOF OF SERVICE

17 STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

18 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.

19 On July 24, 2012, I served the foregoing document described as: **OBJECTION TO DECLARATION**
OF READINESS TO PROCEED on all interested parties in this action by placing a true copy thereof enclosed
20 in a sealed envelope with postage thereon fully prepaid in the United States mailed at Sacramento, California,
addressed as follows:

21 **Original To:**

22 Workers' Compensation Appeals Board (Stockton)
23 31 E. Channel Street, Room 344
Stockton, CA 95202

24 **Copies To:**

25 Ms. Mackenzie Dawson
26 AIMS Insurance (Sacramento)
Post Office Box 269120
27 Sacramento, California 95826-9120
Via Email

28

STOCKWELL HARRIS SACRAMENTO
KALIE WIKEL
(916) 924-1862
Kalie_Wikel@shww.com

1 Ms. Tiffany Anderson
2 2 N. Avena Ave
3 Lodi, CA 95240
4 (In Pro-Per)

4 ARS Legal
5 13925 Whittier Blvd.
6 Whittier, CA., 90605
7 (lien claimant)

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

8 Executed on July 24, 2012, at Sacramento, California.

9 By  _____
10 Heidi Valentine

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28