

From: **Tiffany Anderson** tiffanyanderson@me.com
Subject: print Kyle subpoena
Date: December 9, 2013 at 3:26 PM
To: Me Anderson tiffanyanderson@me.com



To: Kyle Hansen

From: Tiffany Anderson

CC: Pam Myers

Date: August 16, 2013

Re: Documents needed for QME exposure evaluation on October 24, 2013 with
Thomas Allems, M.D., MPH

Per our agreement, I am counting on your assistance to obtain critical records for my QME evaluation. As discussed, I do not have access to these documents for various reasons.

The following documents are essential to my QME appointment and **must** be provided to me before my evaluation.

Please send me:

1. A copy of all records, medical and otherwise, pertaining to pre-employment medical examinations performed by Dameron Occupational Health, including those retained by Dameron Occupational Health and the SJCM&VCD.
2. All records for medical encounters at Dameron Occupational Health for dates of service **6/9/2004, 1/26/2005, and 11/01/2005.**

Please include records from the initial date of service through the release date, including but not limited to:

Copies of DWC-1's

Documentation of any verbal instructions and comments between SJCM&VCD/fellow employees/supervisor(s) and the doctor/medical staff

All medical records, lab results, reports, evaluation, notes written or transcribed

Note: SJCM&VCD may have paid cash for the treatment on 1/26/2005. If records are not found, Eddie Luchessi may be able to assist in obtaining them.

3. SJCM&VCD MSDS labels and chemical treatment records from 2000-2010, including but not limited to the application or use of Formalin, and/or other parasite treatments, herbicides, pesticides, and fungicides at the White Slough facility in Lodi, along with the documentation that all employees had been notified of the use of these substances, and the signed safe handling procedures from all employees. If this is not available for all employees, please send my own records.

4. A copy of the SJCM&VCD memo from John R. Stroh, Manager to SJPEA representative Kay DeGeest, dated 6/3/98, titled "Employee wastewater handling information update."

5. A copy of the SJCM&VCD training binder titled "Agricultural and Municipal Waste Water Information" noted in the above referenced memo.

6. A copy of safety leaflet N-8, published by the Ca. Department of Pesticide Regulation.

7. Copies of SJCM&VCD documentation of my training and education records, including my signed acknowledgement of such training, from date of hire through my termination date.

8. Copies of my timesheets from 4/19/2004-12/31/2008.

I respectfully request this information be provided to me by **September 13, 2013**. If at any time you are unable to obtain a specific record in a timely manner, please notify me immediately.

Thank you in advance for your assistance.

Sincerely,

Tiffany Anderson
2 N. Avena Avenue
Lodi, CA 95240
(209) 625-8587