

September 25, 2012

**CONFIDENTIAL SETTLEMENT COMMUNICATION**

**VIA FEDERAL EXPRESS**

Tiffany Anderson  
2 N. Avena Avenue  
Lodi, California 95240

Re: Alleged Employment Claims

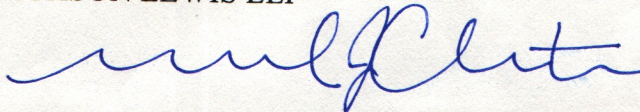
Dear Ms. Anderson:

As you are aware, my firm represents the San Joaquin County Mosquito Vector Control District in its labor and employment matters. The District is willing to engage in a mediation with you to try to resolve your allegations against the District. This would be a non-binding process before a third-party mediator acceptable to both parties. If you desire, this mediation could also attempt to resolve your underlying workers' compensation claim. The District would pay for the cost of the private mediator. The District proposes the use of one of the following three mediators: Daniel Quinn, Mark Keppler and Claudia Long. The CVs of these mediators are attached. Mr. Quinn is a long-time local mediator in Stockton. The other two mediators would travel to the Stockton area and regularly conduct employment mediations for state and federal agencies. Please feel free to research them or contact them for further information.

If you are interested in this offer, please contact me within the next 10 days--on or before October 5, 2012. Likewise, please feel free to contact me if you have any questions. Thank you.

Very truly yours,

JACKSON LEWIS LLP



Michael J. Christian

MJC/ka  
Enclosures

4830-4594-5873, v. 1



# DANIEL F. QUINN

QUINN & KRONLUND, LLP  
Waterfront Office Towers  
509 West Weber Avenue, Suite 400  
Stockton, CA 95203-3167  
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AV-RATED BY MARTINDALE-HUBBELL

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## PROFESSIONAL EXPERIENCE

<i>June 2003 - present:</i>	Quinn & Kronlund, LLP
<i>December 1994 - May 2003:</i>	Law Offices of Daniel F. Quinn
<i>August 1978 - November 1994:</i>	Senior Partner, Kroloff, Belcher, Smart, Perry & Christopherson, Stockton, CA
<i>January 1976 - August 1978:</i>	Associate, Kroloff, Belcher, Smart, Perry & Christopherson, Stockton, CA
<i>1972 - 1975:</i>	Deputy District Attorney, Santa Clara County

**ADR Experience:** Since 1990, has successfully mediated/arbitrated more than 7000 disputes Statewide in real estate (residential and commercial), agribusiness, FELA, labor and employment, commercial business, probate/trust, contract, partnership, professional negligence, bad faith, governmental entities, product liability, environmental, elder abuse, healthcare, family law, construction, personal injury, uninsured/under-insured motorist and first party insurance settings. Certified Mediator, AAA; Judicial Arbitrator, San Joaquin-Sacramento-Stanislaus-Calaveras-Tuolumne Counties; Uninsured Motorist Arbitrator/Mediator; Arbitrator-Raisin Bargaining Association; Special Master:Complex-Construction-Class Action; Discovery Referee; Neutral Evaluator; Judge Pro Tem; Temporary Judge; Expert Witness.

**Litigation Experience:** Trial practice, civil and criminal, includes cases involving governmental entities, law enforcement agencies, real estate, business, child molestation, child abuse, murder, personal injury, bad faith, employment, construction and professional negligence. Experience includes representing both plaintiffs and defendants in all matters.

**Membership:** San Joaquin County Superior Court ADR Committee; San Joaquin County (Board of Governors 1981-88, Judicial Liaison Committee (1988--)) and American Bar Associations; The State Bar of California (State Bar Court Referee/ Probation Monitor 1983--); Association of Defense Counsel of Northern California (President); American Board of Trial Advocates; Association of Defense Trial Attorneys (Board of Directors 1992-96); California Defense Counsel (Board of Directors 1992-2005); Defense Research Institute; Consumer Attorneys of California; Judge Consuelo M. Callahan Inn of Court (2006--).

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## EDUCATION

University of San Francisco (B.A., 1968; J.D., 1971); admitted to California bar 1971. Assistant Editor, University of San Francisco Law Review (1970-71); President - Phi Alpha Delta. Professor, Alternative Dispute Resolution, Humphreys College School of Law, Stockton, CA (2003 -2010).

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## LECTURES

Lecturer, Association of Defense Counsel of Northern California & Nevada, "Alternative Dispute Resolution" (2001-2010), Sacramento/San Francisco,CA; Lecturer, PARMA Conference, "Alternative Dispute Resolution" (2001), Monterey,CA; Lecturer, Association of Southern California Defense Counsel Construction Defects Seminar (1999), Santa Barbara,CA; Lecturer, Sacramento Superior/Municipal Courts Advanced Settlement Skills Seminar (1998), Sacramento,CA; Lecturer, Association of Defense Counsel Construction Defects Seminar (1997), Santa Clara,CA; Lecturer, Association of Defense Counsel of Northern California, (Annual Meeting 1996), San Francisco,CA "Alternative Dispute Resolution"; Chairman and Lecturer, Association of Defense Counsel of Northern California, San Francisco,CA, (Annual Meeting 1992); Lecturer, San Francisco County Bar Association (1995) and San Joaquin County Bar Association, Stockton,CA, "Mediation/Arbitration" (1993-95); Lecturer, Association of Defense Counsel of Southern California, Los Angeles,CA, "Legislative Process" (Annual Meeting 1991); Lecturer, Association of Defense Counsel of Northern California, San Jose,CA, "Damages - Catastrophic Cases" (1991); Lecturer, Defense Research Institute, Las Vegas,NV, "Damages - Sexual Dysfunction" (1990); Lecturer, Association of Defense Counsel - Northern and Southern California, Hawaii, "Wrongful Termination" (1988).





## CLAUDIA HAGADUS LONG

ATTORNEY / MEDIATOR

**I provide Mediation, Arbitration and Special Master services in cases involving Construction, Real Estate, Estates and Trusts, Banking, Employment, and Business Disputes.**

### Education

B.A. Harvard University, 1976

J.D. Georgetown University, 1980

### Professional Background

- 1997-present: Long Law Offices, of counsel: Mediation.  
Mediation of over 800 cases. Arbitration and Special Master services, Insurance Umpire.
- 2010-present: Mediator- Staff Counsel, Department of Fair Employment & Housing, State of California, DFEH, 1515 Clay Street, Suite 705, Oakland, CA.  
Mediation of Employment Discrimination cases through DFEH.
- 1991-1997 Law Office of Claudia Hagadus Long.  
Walnut Creek, CA.  
Litigation of Construction, Real Estate, Banking and Commercial Disputes.
- 1987-1991 Hyde & Drath, San Francisco, CA  
Litigation and trial experience in Construction, Real Estate and Business Disputes.
- 1981-1987 Bank of America, Legal Department, Litigation Section  
San Francisco, CA  
Progressive litigation and trial experience in Banking Disputes.

Languages: Fluent in Spanish and French

### Licenses and Professional Associations:

State Bar of California, license no. 098102  
Contra Costa Bar Association  
California Academy of Distinguished Neutrals  
[www.californianeutrals.org/claudia-long](http://www.californianeutrals.org/claudia-long)  
SMART Mediation Panel, Contra Costa Superior Court

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## MARK J. KEPPLER

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Clovis, CA 93611

Phone/Fax: 559-323-0892  
Email: mkeppler@csufresno.edu

### NEUTRAL EXPERIENCE

- 1989 - Present      Arbitrator  
Federal Mediation and Conciliation Service, and California State Mediation and Conciliation Service Labor-Management Arbitration Panels, as well as through attorney referrals. Written over 150 labor-management arbitration decisions.
- 1998 - Present      Mediator  
U.S. Equal Employment Opportunity Commission's Alternative Dispute Resolution Program (San Francisco, Los Angeles, Phoenix, Dallas and St. Louis Regional Offices), as well as through attorney referrals. Mediated over 750 employment disputes.

### OTHER RELEVANT EXPERIENCE

- 2004 – Present      Executive Director  
Maddy Institute of Public Affairs, California State University, Fresno. Responsible for university's public affairs institute. Activities involve increasing citizen involvement, improving governmental leadership and providing policy analysis.
- 1998 – 2003      Director of Graduate Programs  
Craig School of Business, California State University, Fresno. Responsible for MBA program with an enrollment of approximately 250 students.
- 1987 – Present      Professor of Human Resource Management  
Craig School of Business, California State University, Fresno. Areas of specialization are labor and employment law, industrial relation, dispute resolution and business ethics.
- 1984 – 1987      Attorney  
Shipman & Goodwin, Labor and Employment Law Section, Hartford, CT.
- 1981      Labor Relations Specialist  
U.S. Department of Labor, Washington D.C.



## EDUCATION

1984	<u>J.D. – University of Wisconsin</u>
1981	<u>M.S. – University of Wisconsin</u> Major: Industrial Relations Concentration: Collective Bargaining
1979	<u>B.S. – State University of New York</u> Major: Business Administration Minor: Economics

## AFFILIATIONS

Federal Mediation and Conciliation Service  
California State Mediation and Conciliation Service  
U.S. EEOC Alternative Dispute Resolution Program  
Society for Professionals in Dispute Resolution  
American Bar Association (Labor and Employment Law, ADR Sections)  
Connecticut and Wisconsin Bars (Inactive)

## FEES

Mediation	\$3,000 per scheduled day if within 50 miles or \$4,000 per scheduled day if greater than 50 miles, plus travel expenses. All costs split by the parties unless otherwise agreed. A mediation session is any portion of a day up to eight hours. If a mediation session (day) lasts longer than eight (8) hours, the additional time will be billed at \$500 per hour. Only time spent at the mediation session is billed. Travel time, as well as time for research and reviewing pre-mediation materials is not billed.
Arbitration	\$1,500 per scheduled day, plus travel expenses (split by the parties unless otherwise agreed). A hearing day is any portion of a day up to eight hours. Time for research and writing is pro-rated. Travel time is not billed.
Travel Expenses	Actual cost of airfare, rental car, lodging and meals will be charged. Automobile mileage is charged at the approved IRS rate
Cancellation Fee	If a scheduled mediation or arbitration hearing is postponed or cancelled with notice of less than two (2) calendar weeks (14 days), \$1,500, plus any expenses incurred (e.g., airline ticket). All costs split by the parties unless otherwise agreed.





SACRAMENTO

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Sacramento, CA

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