

**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.shwm.com

September 26, 2013

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

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

WCAB NO.: 1) ADJ7004221; 2) ADJ7004227; 3) ADJ7010682; 4)
ADJ7976768
CLAIM NO.: VE0700184
OUR FILE NO.: 300141-040
DATE OF LOSS: 1) 6/19/08 2) 7/2/09 3) 3/26/09; 4) 6/29/11

Dear Ms. Anderson:

I am in receipt of your correspondence dated August 16, 2013. I am also in receipt of your Application alleging a new cumulative trauma injury through November, 2011.

In contrast to your email I have recommended that my client deny your claim based upon a lack of medical evidence. I also of the opinion that we can deny the claim on a Statute Of Limitations Defense.

Regarding your request for documents please find enclosed certain documents that I have been able to obtain from the employer.

I do have some questions before I request that SJCM & VCD begin the arduous task of compiling additional records.

LOS ANGELES OFFICE
3580 Wilshire Boulevard, 19th 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 2340
San Diego, California 92101
(619) 696-1436

SAN FRANCISCO OFFICE
222 Kearny Street, 9th 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
7541 North Remington Avenue, Suite 105
Fresno, California 93711
(559) 226-9030

ALEXANDER G. ABDOLIN
DANIEL J. AGUILAR
JOEL STEPHEN ALLAN
EDITTE ALSEN
SHELLY HAY ANDERSON
TRAVIS M. BAILEY
LUCY W. BENTON
JEFFREY D. BLAS
ANNE C. BOBCHICK
BELA BODEY
MONIQUE PRIDE BROOKS * 1
ANTHONY GANNIZZO
SHANNON CORNAY CLAUDIO
JASON S. COLLIER
DARLENE EVANS
JAMIE BETH FOX
LINDA S. FREEMAN
JAN P. FUCHS *
CAMELIA GAMBOA
KIMBERLEY S. GASKILL
JASON S. GINSBERG 11111111
MITCHELL ANDREW GOLDMAN
TRACIE L. GOODWIN
JEFFREY W. GREATHOUSE
RICHARD K. GREEN 111111
JENNIFER A. HABER
LISA A. HANHART
KIMBERLY A. HANSEN

KYLE ROBERT HANSEN
PAULA N. HARRIS 11
STEVEN I. HARRIS
L. STEVEN HATTENDORF
ERIC G. HELPHREY
VANESSA I. HENDERSON *
TED L. HIRSCHBERGER
BRIAN R. HORAN
MARY HUANG
ROBERT A. JAMESON
SCOTT T. JELENSKY
DUANE F. KENDALL *
LISA R. KERHER
PETER S. KIM
JESSE EVAN KOZMA
DEREK A. KUHEN
DEBRA ODOM KUTTNAUER
JEANNIE M. LAGORIO
JEFFREY T. LANDRES
MENELY YARA LARI-JONI
SCOTT A. LASSERS
JAMES R. LAVIN
JOSHUA A. LAZAR
RENEE D. LOGOLUSO
JEFFREY S. MARSHLO
JANET M. MAUS
HEATHER D. MCGUNIGLE
JULIA A. MILES

ROBERT A. MOORE
THOMAS P. MOOS
EDWARD S. MUEHL
CARLA F. T. MULLER
JAMES L. MYERS
KIA E. MYERS
BRENDAN O'MELIA
MICHAEL R. O'NEILL
JANET ORMOND-ANDRIZZI
JOYCE PAGE
IAN D. PAIGE
PENNY PAXTON * 11111111
BRIAN D. PEDERSON
TERRI N. PHAN
FREDERIC J. PHANEUF
HEIDI P. PIERCE 11111111
AARON M. PROBIN
GAIL D. RACKLIFFE
COLEMAN E. RAMSEY
JARED D. RENFRO
RACHEL R. ROHATGI
LARRY W. SAGER
CHRISTIAN M. SANTOS
JOSEPH SCHNEIDER
ANGELA M. SEKI 1111
MICHAEL M. SELA, M.D.
GARRY S. SHAY
JAMES C. SHIPLEY

NEDA S. SWEDELSON 111111
SAMUEL L. TOLWIN
SU TRAN
STEPHEN I. TURK
MICHAEL V. VARON
AURORA VASQUEZ
LISA A. VIDMAR
JOSHUA B. VINOGRAD
JESSE WALES
KATHA A. WALKER * 111
ABRAM M. WATTS
BARRY J. WEITZ
KEVIN M. T. WHITE
ERRICK J. WINEK
PAUL S. WOLSEY
GEORGE WOOLVERTON
MATTHEW B. WOOLVERTON
DANIEL G. YOHRMAN
DANIEL J. YSABAL *
BARRANCE G. ZAKAR *
ALISA TOBIN ZEA
JOSEPH E. ZUCKERMAN

* CERTIFIED SPECIALIST WORKERS' COMPENSATION LAW THE STATE BAR OF CALIFORNIA BOARD OF LEGAL SPECIALIZATION
1 ALSO LICENSED IN THE STATE OF ILLINOIS
11 ALSO LICENSED IN THE STATE OF NEW YORK
111 ALSO LICENSED IN COLORADO AND WASHINGTON D.C.
1111 ALSO LICENSED IN THE STATE OF NEVADA
11111 ALSO LICENSED IN THE STATE OF TEXAS
111111 ALSO LICENSED IN THE DISTRICT OF COLUMBIA AND STATE OF WASHINGTON
1111111 ALSO LICENSED IN THE STATE OF VIRGINIA
11111111 ALSO LICENSED IN THE STATE OF PENNSYLVANIA
111111111 ALSO LICENSED IN THE STATE OF MISSOURI

LIEN SPECIALISTS
SHAWNNA R. BARRETTO
RINA DEL ROSARIO
KERRY ENDERSON
GERALDINE GARCIA
RICHARD P. GARCIA
OLIVIA INIQUEZ
MITCHELL J. KIM
JAMES E. LEE
TERA LOWERY
CARI LYN PELAYO
VICKI PERIZZOLO
VIVEK RAO
BARRY SKOLNICK
SEAN TALIAFERRO
ROXANA VAMVULESCU
JOLINDA M. VYSMA

I will refer to them as Item Numbers.

1. Please explain to me the relevance of your pre-employment physical results.
2. Please advise why you were seen at Dameron Occupational Health on the dates listed. Please advise if you filed claims alleging a work place injury for those dates.
3. I will ask for MSDS sheets in the District's possession for the locations that you serviced . If you worked at the White Slough Facility in Lodi I will ask for those records. It is of no relevance to your workers' compensation case what other employees were provided.
4. Please explain how this is relevant to your case.
5. Please explain how this is relevant to your case.
6. Please explain how this is relevant to your case.
7. Please explain how this is relevant to your case.
8. Please explain how this is relevant to your case.

As I discussed with you on the phone the issue for Dr. Allems to address is whether or not you sustained an industrial injury due to chemical exposure on June 29, 2011. As we have discussed on the phone it would be my preference and I believe consistent with the law to have Dr. Allems also address the issue of whether or not you sustained exposure on a cumulative trauma basis through November of 2011. It is my opinion that the only material that is relevant for such a determination is the following:

1. Information of the locations that you worked.
2. MSDS Sheets noting the chemicals and pesticides that you have worked with.

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

Page 3

September 3, 2013

3. Medical Reports showing that you had sustained some type of injury (reaction) due to the exposure of those chemicals or pesticides.

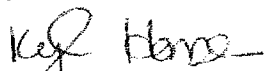
Dr. Allems is not going to address anything related to your knee injury. I understand your disappointment with Dr. Tabaddor's findings but it is my opinion that he is the Panel QME and should remain as such to address any other issues related to know knees.

The examination with Dr. Allems is scheduled for October 24, 2013. If there are issues concerning his examination and documentation to be provided I recommend that we reschedule the evaluation. We can always request a Conference at the Stockton WCAB to address the issues.

Please do not hesitate to contact me should you wish to discuss this matter further.

Very truly yours,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL
A Professional Corporation



KYLE R. HANSEN

KRH:krh

Enclosures