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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.

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September 3, 2013

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.

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

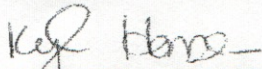
Dr. Allems is not going to address anything related to your knee injury. I understand your disappointment with Dr. Tabaddor's findings but it is my opinion that he is the Panel QME and should remain as such to address any other issues related to know knees.

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