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6 Attorney for Defendant  
7 SAN JOAQUIN COUNTY MOSQUITO  
8 AND VECTOR CONTROL DISTRICT

9 WORKERS' COMPENSATION APPEALS BOARD  
10 STATE OF CALIFORNIA

11 TIFFANY ANDERSON, )  
12 Applicant, )  
13 vs )  
14 )  
15 )  
16 SAN JOAQUIN COUNTY MOSQUITO )  
17 AND VECTOR CONTROL DISTRICT )  
18 Defendant. )  
19 \_\_\_\_\_ )

CASE NO: ADJ 7976768

20 **NOTICE OF TAKING DEPOSITION**  
21 **AND REQUEST FOR PRODUCTION**  
22 **OF DOCUMENTS AND THINGS ON**  
23 **ORAL EXAMINATION REGARDING**  
24 **LABOR CODE §132a PETITION**

25 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

26 PLEASE TAKE NOTICE that defendant, pursuant to California Code of Civil Procedure  
27 Sections 2016.010 *et seq.*, 2017.010 *et seq.*, 2019.010 *et seq.*, 2025.010 *et seq.*, and/or 2020.010  
28 *et seq.*, will take the deposition of applicant, **Tiffany Anderson**, on **October 20, 2011** at **1:30**  
**p.m.** at the **Law Office of Christopher K. Eley, 343 E. Main St., Suite 710, Stockton,**  
**California**, before a Notary Public and/or shorthand reporter duly authorized to administer oaths  
in the State of California.

1 NOTICE IS FURTHER GIVEN that pursuant to Code of Civil Procedure 2025 (h)(1),  
2 applicant is requested to produce at said deposition the following documents which are within  
3 applicant's possession, custody or control:

- 4 1. All witness statements concerning the facts and circumstances surrounding the  
5 claimed injury(s) which is/are subject of this proceeding.
- 6 2. All photographs, sketches, or diagrams depicting the facts and circumstances  
7 surrounding the claimed injury(s) which is/are the subject of this proceeding.
- 8 3. All non-privileged calendars, memos and diaries prepared by the applicant, which  
9 relate to the claimed injury(s) which is/are the subject matter of this proceeding.
- 10 4. Any documents that the applicant relies upon towards proof of the underlying claim.

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**EXHIBIT "A"**

**PROOF OF SERVICE**

I am over the age of eighteen years, not a part to this action, and employed in San Joaquin County at 343 E. Main Street, Stockton, California 95202, (209) 466-8511.

On September 30, 2011, I served the following document(s):

**NOTICE OF TAKING DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS ON ORAL EXAMINATION REGARDING LABOR CODE § 132a PETITION**

  xx   BY MAIL: I caused such envelope to be deposited in the mail at my business address, addressed to the addressee(s) designated. I am readily familiar with the collection and processing of correspondence and pleadings for mailing of this office. It is deposited with the United States Service on that same day in the ordinary course of business.

       BY FACSIMILE: I caused a true copy of the above documents to be transmitted to the facsimile machine number(s) of the addressee(s) designated.

       (BY FEDERAL EXPRESS) by placing a true copy thereof enclosed in a sealed envelope, prepaid, deposited with the Federal Express carrier/box at Stockton, California, addressed as indicated above.

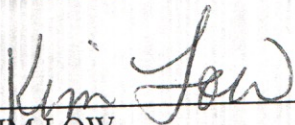
       (BY PERSONAL SERVICE) by hand delivering and leaving a true copy with the person and/or secretary at the address indicated above.

       BY ELECTRONIC MAIL: I caused a true copy of the above documents to be transmitted via email to the. Email addresses below.

**Tiffany Anderson  
2 N. Avena Avenue  
Lodi, CA 95240**

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

Executed on September 30, 2011 at Stockton, California.

  
\_\_\_\_\_  
KIM LOW