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## **PANEL QUALIFIED MEDICAL RE-EVALUATION**

**November 1, 2011 at 9:30 a.m.**

October 4, 2011

Dr. Khosrow Tabaddor  
8221 N. Fresno Street  
Fresno, CA 93720

**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 Dr. Tabaddor:

Thank you for agreeing to re-examine applicant, Tiffany Anderson.

Please recall, you previously examined the applicant on June 15, 2010, issuing a report of the same date, as well as a supplemental report of August 20, 2010. I am enclosing a copy of her entire medical file for your records.

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October 4, 2011

As you will recall, she was hired in April 2004 as a mosquito abatement technician. You previously examined her regarding the following injuries:

- a) June 19, 2008: right knee claim
- b) March 26, 2009: right knee claim

These claims settled in 2009.

Now, the applicant has filed a new right knee claim **of June 29, 2011** when she struck a metal T-bar while walking the perimeter of a pond.

Following this June 29, 2011 incident, she initially treated with Dr. Jon Eck, M.D. Dr. Eck treated her on July 6, 2011 and July 18, 2011, diagnosing a contusion of the right knee; first-aid case; and returned to full duty on July 18, 2011.

Subsequently, Dr. Eck reviewed a right knee MRI and issued a report of September 27, 2011. Please closely review this report.

The applicant worked full duty from roughly June 29, 2011 through August 16, 2011.

During the time that she was treating with Dr. Eck, she was also treating with James Shaw, M.D. She first treated with Dr. Shaw on April 23, 2011, then May 20, 2011 and finally on July 12, 2011 wherein Dr. Shaw resigned. Dr. Shaw reported at that time that "Although the patient reports an interval change since her last appointment with an aggravation of her prior knee injury I can not tell there is any change..." (See page 4).

I think it is important to remember that she is claiming a new injury on June 29, 2011. However, she had prior treatment with Dr. Shaw on at least two occasions (April 23, 2011 and May 20, 2011), complaining of right knee pain; as well as Dr. Murata on January 6, 2011.

After treating with Dr. Eck and after Dr. Shaw resigned the applicant returned to treating with Dr. Murata. Dr. Murata ordered an MRI and on January 26, 2011, Dr. Murata indicates that "since her symptoms do not specifically



October 4, 2011

correlate with the MRI findings, I believe she is a candidate for physical therapy. She would benefit from right physical therapy sessions including modalitiies and strengthening exercises."

Once the applicant started treating with Dr. Murata, she was placed on modified duty and the employer offered her modified duty beginning September 21, 2011 and continuing through the date of this letter.

We ask that you carefully consider the medical records, including her treatment prior to the new industrial claim of June 29, 2011 for right knee pain (January 6, 2011, April 23, 2011 and May 20, 2011), plus, apparently she was receiving a narcotic medication from possibly Kaiser due to her knee claim.

**After considering this information, please opine as to whether or not her new period of temporary disability following the June 29, 2011 is a result of that incident or the prior knee claim of June 19, 2008.** Again, Dr. Eck had returned her back to full duty following the June 29, 2011 incident and Dr. Shaw stated that he could not tell there was any change with her knee complaints.

After interviewing the applicant and conducting your usual thorough examination as well as reviewing all of the records submitted, please issue a report answering the following queries.

**Maximum Medical Improvement**

Has the applicant's condition reached maximum medical improvement? Assuming yes, on what date was maximum medical improvement reached?

**June 19, 2008/June 29, 2011 Right Knee Claim:**

Does the need for ongoing benefits, including temporary disability, flow from the June 19, 2008 right knee claim or the new claim of June 29, 2011. Again, she treated between January 2011 and May 2011 for the knee. So, are the symptoms, need for treatment, etc. a continuation of the June 19, 2008 right knee claim?



October 4, 2011

**Permanent Disability:**

Does applicant have any permanent disability attributable to industrial injury? If so, please assess permanent disability based on AMA Guidelines (whole body impairment).

**Work Restrictions:**

Please outline with specificity each and every work restriction, if any.

**Medical Treatment:**

Will applicant require any treatment in the future to cure or relieve the effects of the industrial injury? If so, please identify the modalities of treatment, along with the frequency and duration. Please include your comments regarding any possible need for surgery, epidural injections, diagnostic studies, physical therapy or other treatment/diagnostic procedures.

**Entitlement to Re-training Voucher:**

As far as your field of specialty is concerned, is applicant able to perform her usual and customary job duties of the incident of employment? If not, please provide the specific work restrictions. Should you need a complete job analysis to provide an opinion in this matter, please advise.

These specific questions are not intended to limit you in any way in the conduct of your examination or writing of your report.

Please obtain any x-rays or other diagnostic test reasonably necessary to assist you in the completion of your medical examination report.

For all evaluations completed after July 16, 1993, regardless of the date of injury, you must include a statement in the body of your report that you have not violated Labor Code Section 139.3 and that the contents of your report are true to the best of your knowledge. This statement must be made under the penalty of perjury [please see Labor Code Section 5703(a)(2)]. Failure to include this



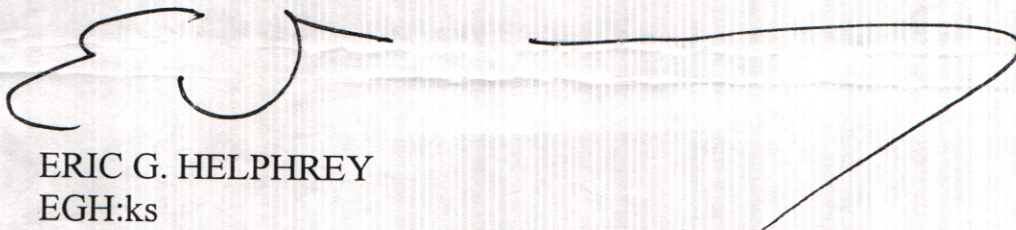
October 4, 2011

statement may render your report inadmissible at trial and your bill subject to dispute.

Your courtesy and cooperation in this matter is greatly appreciated.

Very truly yours,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL  
A Professional Corporation

A handwritten signature in black ink, appearing to read "Eric G. Helpfrey". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

ERIC G. HELPHREY

EGH:ks

*Enclosures: Entire Medical File To Date (October 20, 2005 - September 29, 2011)*  
*Deposition Transcript of Tiffany Anderson dated June 3, 2010*

cc: Ms. Tiffany Anderson  
Ms. Mackenzie Dawson, AIMS Insurance (Sacramento)