

RONALD M. STEIN  
ATTORNEY

CHRISTOPHER P. WEE  
ATTORNEY

## Ronald M. Stein, Inc.

PROFESSIONAL LAW CORPORATION

4521 QUAIL LAKES DRIVE • STOCKTON, CA  
95207-5257  
(209) 957-9744 • FAX (209) 957-3005  
rsteinlw@aol.com

CARMEN BLASK  
PARALEGAL

October 5, 2009

Mackenzie Dawson  
AIMS  
P.O. Box 269120  
Sacramento, CA 95826

Re: Tiffany Anderson vs San Joaquin County.- Mosquito and Vector Control District  
DOI: 06/19/2008 03/26/2009 07/02/2009  
EAMS No: ADJ  
WCAB No: Unassigned Unassigned Unassigned  
Claim No: VE0700184

Dear Ms. Dawson:

This office has been retained to represent the above-referenced Applicant in this workers' compensation case. Enclosed herein is a copy of the Employee's Claim for Workers' Compensation Benefits, the Disclosure/Declaration Statements and the Application for Adjudication of Claim that is being filed with the Workers' Compensation Appeals Board.

YOU CONTINUE TO HAVE OUR PERMISSION TO SPEAK DIRECTLY TO MY CLIENT AS IT RELATES TO LATE, LOST, UNSENT OR MISSING CHECKS. Other than lost, late, unsent or missing checks we trust you will not communicate directly with our client, but will go through our office with any request or information you may need.

We would appreciate your sending by return mail or by fax (209-957-3005) a list of all the chiropractors in your MPN, within 25 miles of the Lodi, CA area.

Please forward all medical reports to this office within 20 days or we will have a copy service obtain the medicals and bill the insurance company.

A Continuing Demand is hereby made for the following, and we will object to any deposition if this information is not forwarded to this office.

**1. A copy of your entire medical file on all claimed injuries whether they pertain to the current claim or prior claim.**

**2. A copy of all of your claim files including notes and documentation related to provision, delay or denial of benefits, including any *electronically stored documentation notes* and documentation evidencing the legal, factual, or medical basis for non-payment or delay in payment of benefits, and notes describing telephone conversations relating to the claim which are of significance to claim handling, including dates of calls, substance of calls, and identification of parties to the calls. Also any file notes including the adjustors notes, reserve information, information regarding sub rosa investigation, e-mail communications, between the**



claims adjustor and anyone, including ,but not limited to the claims supervisor and the nurse case manager.

3. A copy of the nurse case manager's notes, reports and correspondence, whether written or by e-mail , and /or any of the nurse case managers notes and/ or e-mail transmissions sent to the claims adjustor, the treating physician, and/or sent or transmitted to the nurse case managers supervisor and /or sent or transmitted to any person working for the insurance company, and/ or the employer.

4. All sub rosa videotapes, film or movies of the applicant (whether accusatory or exculpatory).

5. A copy of all witness, employee or employer statements, all letters and/ or correspondence you, your company, your attorney and/or the employer may have sent to the employee, and/or any doctor including but not limited to any QME and all medical reports, regarding this case. We want all letters whether incriminating and/or exculpatory of the applicant.

6. This office also demands any documentation establishing your continued contacts with the employee's treating doctor.

7. A computer printout of all benefits paid to the applicant.

8. A copy of applicant's wage statement from the employer.

9. Any documents that establish that the investigation complied with Title 8, section 10109, duty to conduct good faith investigation.

10. A copy of the Applicant's Job Description.

The above demands are continuing demands to be renewed every 30 days until this claim is settled or submitted for decision. **Remember, my client will continue to contact you regarding lost, late, unsent or missing checks.**

Finally, if you are of the opinion that the AMA guidelines are applicable to this case then pursuant to Labor Code §4660, the applicant's future diminished earnings capacity must be identified when calculating permanent disability.

The applicant hereby objects to any methodology to measure applicant's future diminished earnings capacity that does not meet the requirements of Labor Code §4660, including but not limited to the Permanent Disability Rating Schedule. The applicant hereby proposes that the parties utilize an Agreed Diminished Future Earning Capacity expert (DFEC) to assist in the calculation of the applicant's permanent disability and the loss of future earning capacity in the above-referenced case(s) and to save costs. The applicant proposes:

Lisa Suhonos  
5250 Claremont Avenue, Suite 215  
Stockton, CA 95207  
(209) 951-0708

Eugene Van de Bittner Ph.D.  
Mirfak Associates, Inc.  
577 Ygnacio Valley Rd.  
Walnut Creek, CA 94596-3801



Page three  
October 5, 2009

If the applicant goes to an Agreed Diminished Future Earning Capacity expert (DFEC), you will be notified and will have the opportunity to cross-examine the DFEC expert. I would request the same courtesy.

Your continued cooperation with this office will be greatly appreciated.

Very truly yours,

RONALD M. STEIN, INC.  
Professional Law Corporation

A handwritten signature in cursive script that reads "Ron Stein". The signature is written in black ink and is positioned above a horizontal line.

---

Ronald M. Stein  
RMS/elc

Enclosure

cc: Tiffany Kay Anderson