

From: Tiffany Anderson <tiffanyanderson@me.com>  
Subject: Fwd: how to format your exposure claim  
Date: October 16, 2013 4:24:53 PM PDT  
To: Abdullah Aliyah <aliyah.abdullah@me.com>

Do you have the desire to represent me? If you do not I want to discuss and severe any contractual agreement made verbal or legal.

If you are still representing me please correspond with me soon.

Have you been contacted in any way by the opposing counsel?

Thank you,

Tiffany Anderson

**From:** Tiffany Anderson <[tiffanyanderson@me.com](mailto:tiffanyanderson@me.com)>  
**Date:** October 16, 2013 at 4:07:38 PM PDT  
**To:** Me Anderson <[tiffanyanderson@me.com](mailto:tiffanyanderson@me.com)>  
**Subject:** how to format your exposure claim

October 16, 2013

Dear Kyle,

I am sincerely grateful for the documents provided, but I am still missing many of the requested documents. Below are the explanations you asked for. Please review my responses and furnish me with the requested records in time for me to assemble them for the QME.

Thank you,

Tiffany Anderson.

I requested:

**1. A copy of all records, medical and otherwise, pertaining to pre-employment medical examinations performed by Dameron Occupational Health, including those retained by Dameron Occupational Health and the SJCM&VCD.**

“Please explain to me the relevance of your pre-employment physical results.”

My pre-employment physical exam results serve as a base line for my overall health prior to my employment with the district and prior to my first exposure. Under the law, I have the right to see and copy my own medical records, and employers are to make them available to me (CCR Title 8.)

**2. All records for medical encounters at Dameron Occupational Health for dates of service 6/9/2004, 1/26/2005, and 11/01/2005. Please include records from the initial date of service through the release date, including but not limited to:**

- **Copies of DWC-1's**
- **Documentation of any verbal instructions and comments between SJCM&VCD/fellow employees/supervisor(s) and the doctor/medical staff**
- **All medical records, lab results, reports, evaluation, notes written or transcribed**
- **Note: SJCM&VCD may have paid cash for the treatment on 1/26/2005. If records are not found, Eddie Luchessi may be able to assist in obtaining them.**

“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.”

When I reported symptoms to my employer, I was told to fill out a DWC-1 form and to visit Dameron for my pre-employment physical and for all work comp related injuries. The dates above were approximated; the work comp claims I filed were for dates 6/9/04, 1/21/05, 10/11/05, and 6/30/11. The documents I received from Dameron were incomplete and left out much of the doctor's examination notes, lab results, and other important aspects of my medical file (to which I am entitled)

**3. SJCM&VCD MSDS labels and chemical treatment records from 2000-2010, including but not limited to the application or use of Formalin, and/or other parasite treatments, herbicides, pesticides, and fungicides at the White Slough facility in Lodi, along with the documentation that all employees had been notified of the use of these substances, and the signed safe handling procedures from all employees. If this is not available for all employees, please send my own records.**

“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.”

Besides servicing White Slough, I was deployed there for various other tasks (as were all other employees of that time), including (but not limited to) site maintenance for the facilities there. My timesheets clearly illustrate my relationship with White Slough, and it is within my rights to be given the SJCM&VCD MSDS labels and chemical treatment records from 2000-2010.

**4. A copy of the SJCM&VCD memo from John R. Stroh, Manager to SJPEA representative Kay DeGeest, dated 6/3/98, titled “Employee wastewater handling information update.”**

“Please explain how this is relevant to your case.”

This memo establishes the specific information that my employer had a responsibility to make available to me and my medical providers from the time of my first exposure. The failure of my employer to provide this information to me and my doctors must be clear to put the doctor reports in context.

**5. A copy of the SJCM&VCD training binder titled “Agricultural and Municipal Waste Water Information” noted in the above referenced memo.**

“Please explain how this is relevant to your case.”

This training binder establishes protocol for an exposure, and details for the employee and for any treating physician the wide array of pathogens, chemicals, viruses, toxins, and diseases an employee in my capacity was liable to be subjected to. This resource was guaranteed to our union rep by John Stroh shortly following the removal of fellow employee Ken Savatti (due to exposure-related medical problems). I (and any physician treating me) have a right, and a need, to understand the dangers I can contact from my job.

**6. A copy of safety leaflet N-8, published by the Ca. Department of Pesticide Regulation.**

“Please explain how this is relevant to your case.”

This provides supplemental information regarding my employer’s responsibilities, and my rights as an employee, and gives greater context to Items 4 and 5 (above). I encourage you read it yourself.

**7. Copies of SJCM&VCD documentation of my training and**

**education records, including my signed acknowledgement of such training, from date of hire through my termination date.**

“Please explain how this is relevant to your case.”

These documents prove that there was no attempt to educate me on the presence of chemical exposure when I was moved into areas in which it would have been appropriate. The failure of my employer to teach the dangers that came with working in new areas put me at greater risks in these areas. The district had a responsibility to train me in these areas, and have me sign that I understood the dangers associated with working in them (such as chemical and viral exposure). I have a right to demonstrate when this responsibility was neglected by my employer.

**8. Copies of my timesheets from 4/19/2004-12/31/2008.**

“Please explain how this is relevant to your case.”

These show where I was every minute of every day, and place me in several sites of formalin exposure (including not just the white slough facility, but in company vehicles used to administer formalin). These timesheets plot every incidence of exposure, which my maladies align with perfectly.