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ATTORNEY AT LAW
343 E. MAIN STREET, SUITE 710
STOCKTON, CALIFORNIA 95202
(209) 466-8511

Attorney for Defendant
SAN JOAQUIN COUNTY MOSQUITO
AND VECTOR CONTROL DISTRICT

WORKERS' COMPENSATION APPEALS BOARD
STATE OF CALIFORNIA

TIFFANY ANDERSON,

Applicant,

vs

SAN JOAQUIN COUNTY MOSQUITO
AND VECTOR CONTROL DISTRICT

Defendant.

CASE NO: ADJ 7976768

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

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:


PLEASE TAKE NOTICE that defendant, pursuant to California Code of Civil Procedure Sections 2016.010 *et seq.*, 2017.010 *et seq.*, 2019.010 *et seq.*, 2025.010 *et seq.*, and/or 2020.010 *et seq.*, will take the deposition of applicant, **Tiffany Anderson**, on **October 27, 2011 at 10:00 a.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 This deposition shall continue from day to day except Saturdays, Sundays, and holidays
2 until completed.

3 Please note that the deposition will commence promptly at the scheduled time. Should
4 preparation of the deponent be necessary, this shall be done PRIOR to the time scheduled for the
5 deposition. It is the responsibility of the applicant's counsel to notify the applicant of the time,
6 date and location of the deposition.

7 **NOTICE IS FURTHER GIVEN that the deponent is required to produce at the**
8 **time and place set forth above, the writings, records, documents and other items listed on**
9 **Exhibit "A" which is attached hereto.**

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11 Dated: October 18, 2011

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14 By: Christopher K. Eley
15 Attorney for Defendant
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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 October 18, 2011, I served the following document(s):

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

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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.

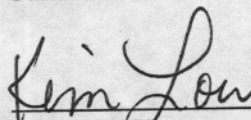
(BY PERSONAL SERVICE) by hand delivering and leaving a true copy with the person and/or secretary at the address indicated above.

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 October 18, 2011 at Stockton, California.



KIM LOW

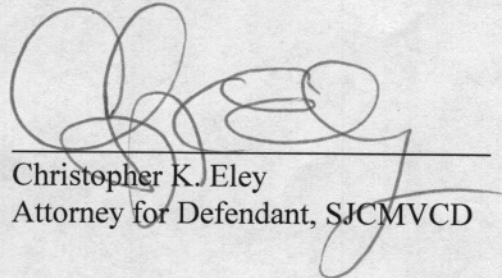
Attorney for Defendant
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7 **NOTICE IS FURTHER GIVEN that the deponent is required to produce at the**
8 **time and place set forth above, the writings, records, documents and other items listed on**
9 **Exhibit "A" which is attached hereto.**

10
11 Dated: November 15, 2011



Christopher K. Eley
Attorney for Defendant, SJCMVCD

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
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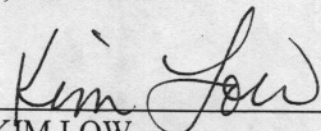
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