

December 31, 2015<sup>4</sup>

70

Honorable Kearsce McGill  
Presiding Judge, Department of Industrial Relations  
Division of Worker's Compensation  
31 East Channel Street, Room 344  
Stockton, CA 95202

RE: EAMS Case Numbers ADJ7004221, ADJ7004227, ADJ9066508, ADJ7010682, ADJ976768

Dear Judge McGill,

I am writing to the court in regard to the above referenced case numbers.

In the last 45 days, I have endured the deaths of my best friend via suicide, my cousin, for whom I was a primary caregiver and power of attorney, and, most tragically, the death of my mother from COPD just 12 days ago.

During this time of tremendous grief and responsibility, I have done my best to work on my case, often to the point of neglecting caregiver responsibilities to my mother prior to her death. For example, I missed many of her medically related trips to UCSF in an effort to complete evidence preparation. I have also been inundated with paperwork from my former employer, the San Joaquin County Mosquito and Vector Control District (the District); their worker's compensation representative Stockwell Harris; their in-house lawyer Christopher Eley; and the QME physician Dr. Tabaddor. To say the least, it's overwhelming right now, and with the final striking blow of my mother's death, I have a need to request relief from the court, specifically:

1. A minimum 90-day delay in any court proceedings, QME appointments, conferences or requests for information from the district or any of their representatives, effective January 1<sup>st</sup>, 2015. (The exception being correspondence related to a reasonable settlement offer sent by the District in an effort to seek a final resolution).
2. An order that the current QME physician, Dr. Tabaddor, submit a conflict of interest statement to the court reporting whether or not he has any involvement in regard to advising employers about worker's compensation claims and/or medical reviews, or whether or not he conducts any sort of business or seminar on how employers can "beat" compensation claims, or topics of a similar nature, and whether or not this is done in partnership with attorneys, employers or his clients.
  - a. By way of background, I discovered this to be the case for another QME doctor retained by Stockwell Harris (Dr. Allems). I want to ensure I have received and continue to receive unbiased care and review from Dr Tabaddor. When I asked Dr. Tabaddor about this potential conflict, as well as why my symptoms were not fully reported, I was rudely asked to leave the QME appointment by Dr. Tabaddor himself.




3. A consultation with one of three dermatologists of my choosing, and at the District's expense, to review current skin lesions on my torso, breast area and scalp that mirror those developed after a work related exposure to formaldehyde in 2005.
4. A consultation with one of three oncologists of my choosing, and at the District's expense, to review current skin lesions and other symptoms such as respiratory issues that can indicate cancer.
5. A delay in any QME appointment with Dr. Tabaddor until above items 2, 3, and 4 are complete. (The next appointment is currently scheduled for January 5, 2015).
6. An order that the defendants prepare a complete copy of all documents, records, medical records and/or other evidence they have in hand or have submitted to the court. These items should be prepared for submission to my attorney (TBD) on a USB flash drive or similar electronic means. To date, I have been sent numerous copies of the same information documented as received, instead of the missing information I have requested several times.
7. I have prepared a USB drive of evidence showing the District's prior efforts to prevent employees from seeking medical attention for worker's compensation cases, and forcing them to leave their positions, but need direction where to submit the information so that you can review the documentation. If you are not the authority who would review these documents, please provide me with the proper contact.

Judge McGill, I have made my best effort to ensure this case proceeds this past year, and this is still my hope. However, I truly need the time and space to cope with these tragedies and the responsibilities they bring. I plan to use the requested 90 days to process my grief, care for my mental well being, to settle family affairs, seek counsel, and to prepare once again for the challenges of this case.

I sincerely thank you for your compassion during this time of personal trial, and for considering my requests.

Sincerely,



Tiffany Anderson

cc: Stockwell, Harris, Woolverton & Muelh