

WORKERS' COMPENSATION APPEALS BOARD

ANSWER OF DEFENDANT

Tom Beard
(INJURED EMPLOYEE)

Case No. STK 0211962

vs.
San Joaquin County Mosquito Vector Control District
(CORRECT NAME OF EMPLOYER, INDICATE IF SELF-INSURED)

Date of alleged injury: CT-1/9/07
7759 South Airport Way
Stockton, CA 95206
(EMPLOYER'S ADDRESS AND ZIP CODE)

AIMS Insurance
(CORRECT NAME OF INSURANCE CARRIER OR IF SELF-INSURED, ADJUSTING AGENCY)

P.O. Box 269120
Sacramento, CA 95826
(INSURANCE CARRIER OR ADJUSTING AGENCY'S ADDRESS AND ZIP CODE)

ANSWERING DEFENDANTS deny the allegations of the application as indicated below with such explanations as expressly set forth and admit all other material allegations.

DENIALS

EXPLAIN BELOW

(Mark X if allegation is denied)

- Employment
- Occupation
- Injury
- Insurance coverage
- Liability for self-procured treatment
- Liability for future medical treatment
- Medical-legal costs
- Earnings
- Periods of disability
- Rehabilitation
- Permanent disability

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Nature and extent (back & right knee)
Sleep disorder denied.
THE DENIAL IS BASED ON DATE OR PART OF BODY INJURED, EXPLAIN FULLY

(CHECK IF EMPLOYER HAS BEEN NOTIFIED TO APPEAR AND DEFEND)

Reasonable and necessary

Reasonable and necessary

Reasonable and necessary

(GIVE LAST DAY WORKED AND CORRECT DATE OF RETURN TO WORK)

Denied pending appropriate evidence and/or demands

(IF APPORTIONMENT IS CLAIMED, SO STATE)

Apportionment

IT IS FURTHER ALLEGED:

1. Defendants have paid disability indemnity in the total amount of \$ proof Subject to proof at the rate of \$ _____ a week beginning _____ through _____ plus _____

2. Affirmative defenses and other matters: All affirmative defenses permitted under California law, including the Labor Code, California Code of Regulations, and case law; post-termination defense and non-discriminatory good faith personal action; contributions and credits and judicial notice of all other cases.

Defendants do not waive the right to raise additional issues in accordance with the provisions of law and the Rules of Practice if other issues develop.

see attached Proof of Service

Dated at Sacramento, California, December, 2007

Eric G. Helphrey, Esq.
(EMPLOYER OR INSURANCE CARRIER)

By: Stockwell, Harris, Widom, Woolverton & Muehl
(ADDRESS AND TELEPHONE NUMBER OF ATTORNEY)
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