

STATE OF CALIFORNIA DIVISION OF WORKERS' COMPENSATION WORKERS' COMPENSATION APPEALS BOARD DECLARATION OF READINESS TO PROCEED

1		
		_

ADJ7004221; ADJ7004227; ADJ7010682;

NOTICE: Any objection to the proceedings requested by a Declaration of Readiness to proceed shall be filed and served within ten (10) days after service of the Declaration.

Case No.		
pplicant		
Tiffany	K	
First Name	MI	
Anderson		
Last Name vs		
Employer Information		
San Joaquin County Mosquito & Vector Control District		
Employer Name (Please leave blank spaces between numbers, names or words)		
7759 S Airport Way		
Employer Street Address/PO Box (Please leave blank spaces between numbers, n	ames or words)	
Stockton	CA	95242
City	State	Zip Code
Lien Conference At the present time the principal issues are: (Check all that apply)		ority Conference
Compensation Rate Rehabilitation/SJDB Temporary		f-Procured Medical Treatment
Permanent Disability Future Medical Treatment AOE/COE Employment Other Global Settlement, Surveillance Disc Declarant relies on the report(s) of:	Dis	f-Procured Medical Treatmen
Permanent Disability	Dis	

Declaran has made	t states under penalty perjury that he or she is presently ready to proceed to hearing on the issues below and the following specific, genuine, good faith efforts to resolve the dispute(s) listed below:
	questing a Status Hearing for the following two (2) matters:
1.	That lawyers with settlement powers from both the Jackson Lewis and Stockwell Harris firms personally appear and together make a global settlement offer to the applicant. Lawyers from both law firms have previously appeared in this WCAB case and have been involved for a number of years with this applicant. This global settlement effort was initiated by Judge Hall several years ago and never manifested into fruition.

A. I ask the parties to appear and show evidence of all previous written offers made to show compliance with Judge Halls order.

- B. I ask that Jackson Lewis produce all documents on the offers made during the handling of Dan Quinn mediations and the EEOC claims of my case.
- 2. That all surveillance materials be turned over to the applicant from all parties who have appeared in my WCAB hearings, whether directly or indirectly hired. If none of the surveillance evidence is going to be used against me, then I'd ask for a declaration in writing to that effect to be handed to me on the day of the WCAB hearing. 5 years surveillance is excessive and I feel violated by the refusal to comply in good faith.

Unless a status or priority conference is requested, I have completed discovery on the issues listed above, and that all medical reports in my possession or control have been filed and served as required by the rules promulgated by the Court Administrator.

Copies of this Declaration have been served this date as shown on the	he attached	proof of service.	
Declarant's Signature		- 1111 - 1111 - 1111 - 1111 - 1111 - 1 111 - 1	
Tiffany Kay Anderson			
Name of declarant or name of the law firm of the declarant (Print or	Type)		
1900 Lakeshore Drive Lodi CA 95242			
Address (Please leave blank spaces between numbers, names or w	vords)		
209-331-0208	Date	1-4-2016	
Phone Number		MM/DD/YYYY	

PROOF OF SERVICE

STATE OF CALIFORNIA COUNTY OF SAN JOAQUIN

I am in the County of San Joaquin, State of California. I am over the age of 18 years.

My residence is 1900 Lakeshore Drive, Lodi, CA 95240.

I served the foregoing document described as:

Readiness To Proceed dated January 4, 2016, on all parties in this action by placing a true copy thereof

enclosed in a sealed envelope with postage thereon fully prepaid in the United States mailed at Lodi, California, addressed as follows:

Stockwell, Harris, Woolverton, Muehl Sara Skolnik 1545 River Park Drive, Suite 330 Sacramento, CA 95815

Jackson Lewis Mike Christian 400 Capital Mall # 1600 Sacramento, CA 95814

San Joaquin County Mosquito & Vector Control District Board of Trustees President To Be handed to all members at the next meeting and to be heard in minutes 7759 S Airport Way Stockton CA 95206

Workers' Compensation Appeals Board 31 E. Channel Street, Room 344 Stockton, CA 95202 Ms. Nancy Urton AIMS Insurance (Sacramento) P.O. Box 269120 Sacramento, CA 95826-91202

Board of Supervisors 44 North San Joaquin Street Sixth Floor Suite 627 Stockton, CA 95202

I certify, under penalty of perjury, that the foregoing is true and correct.

Executed on January 4, 2016, at Lodi, California.

By:

Tiffany Anderson