

Tiffany Kay Anderson
1900 Lakeshore Drive
Lodi CA 95242
209-331-0208
<http://culexpien.com>

January 26, 2016

Judge Alvin Webber
WCAB
31 East Channel St., Room 344
Stockton, CA 95202

WCAB No.: 1) ADJ7004221; 2) ADJ7004227; 3) ADJ7010682; 4) ADJ7976768
5) ADJ9066508

Dear Judge Webber:

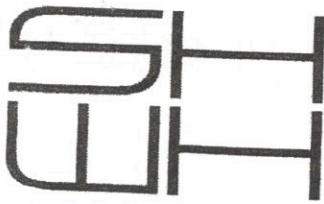
I am writing you today to raise two (2) matters that are important in my above-referenced cases. The first is some long-overdue requested documents that opposing counsel has failed to produce. I've enclosed a copy of our latest email and paper correspondence on that topic as well as a copy of the April 2015 letter that was sent to Judge McGill showing the missing evidence. I'm asking the Court for an order to compel compliance by defense counsel to that list of missing items.

The second matter that I'd like to have a ruling on is related to the exposure QME that was performed in December of 2015. Dr. Bronshvag conducted that exam and he made referral recommendations. At issue is defense counsel's stated refusal to authorize my referral to a mental health expert. I need just such a referral as my poor mental health stems out of the work chemicals that I was exposed to, the work injuries to my right knee, and my 132(a) sexual harassment claim. Both parties should have to heed the recommendations of Dr. Bronshvag. Years ago, even the orthopedic QME (Dr. Tabbador) recommended that I have a mental health referral. I was not the emotional wreck that I am today before I worked for the Mosquito District. I'm asking the Court for a ruling that I be referred for a mental health evaluation.

I realize that I have a MSC set for March 21st, but I'm hopeful that your honor could rule on these two matters before that date. Thank you.

Sincerely,


Tiffany Anderson



STOCKWELL HARRIS WOOLVERTON HELPHREY

A Professional Corporation

1007 West College Avenue, Suite 301 Santa Rosa, California 95401 (707) 861-9866 (707) 581-2135 www.shwm.com

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* CERTIFIED SPECIALIST WORKERS' COMPENSATION LAW THE STATE BAR OF CALIFORNIA BOARD OF LEGAL SPECIALIZATION † ALSO LICENSED IN THE STATE OF ILLINOIS † † ALSO LICENSED IN THE STATE OF NEW YORK † † † ALSO LICENSED IN THE STATE OF NEVADA † † † † ALSO LICENSED IN THE DISTRICT OF COLUMBIA AND STATE OF WASHINGTON † † † † † ALSO LICENSED IN THE STATE OF PENNSYLVANIA † † † † † † ALSO LICENSED IN THE STATE OF MISSOURI

LIEN SPECIALISTS DEVIN H. BLACK SUSANA CASTILLO KERRY COVER RINA DEL ROSARIO BRANDY A. FLORES GERALDINE GARCIA RICHARD P. GARCIA OLIVIA INQUEZ TERA LOWERY LOUIS LOZADA VICKI PERIZZOLO VIVEK RAO BERNARDO ROJAS SHERRI L. SHABESTARI MICHELE TCHOKOUKIAN ROXANA VANVULESCU

January 20, 2016

Ms. Tiffany Anderson 1900 Lakeshore Drive Lodi, Ca 95242

RE: ANDERSON, TIFFANY VS. SAN JOAQUIN COUNTY MOSQUITO & VECTOR CONTROL

WCAB NO.: 1) ADJ7004221; 2) ADJ7004227; 3) ADJ7010682; 4) ADJ7976768; 5) ADJ9066508 CLAIM NO.: VE0700184 OUR FILE NO.: 300141-040 DATE OF LOSS: 1) 6/19/2008; 2) 7/2/2009; 3) 3/26/2009; 4) 6/29/2011; 5) CT - 11/30/11

Dear Ms. Anderson:

I would like to remind once again that I do not accept service by email. More importantly, you continue to contact my client directly on matters related solely to your workers' compensation claim. Specifically, you wrote to AIMS multiple times this month requesting certain documents. You must cease and desist this behavior.

We will reschedule the evaluation with Dr. Tabaddor. The date and address was clearly stated on the notification form as well as the Order Compelling your attendance. You are not to unilaterally cancel any other appointments in the future.

ORANGE COUNTY OFFICE 701 South Parker Street, Suite 2200 Orange, California 92868-4736 (714) 479-1180

SACRAMENTO OFFICE 1545 River Park Drive, Suite 330 Sacramento, California 95815-4616 (916) 924-1862

SAN FRANCISCO OFFICE 222 Kearny Street, 9th Floor San Francisco, California 94108 (415) 734-9310

VENTURA OFFICE 2021 Sperry Avenue, Suite 46 Ventura, California 93003-7417 (805) 654-8994

LOS ANGELES OFFICE 3580 Wilshire Boulevard, 19th Floor Los Angeles, California 90010 (323) 935-6669

SAN DIEGO OFFICE 530 "B" Street, Suite 2000 San Diego, California 92101 (619) 696-1436

SAN BERNARDINO OFFICE 735 East Carnegie Drive, Suite 270 San Bernardino, California 92408 (909) 381-5553

SAN LUIS OBISPO OFFICE 1150 Osos Street, Suite 202 San Luis Obispo, California 93401 (805) 541-0440

FRESNO OFFICE 8080 N. Palm Avenue, Suite 101 Fresno, California 93711 (559) 226-9030

ANDERSON, TIFFANY VS. SAN JOAQUIN COUNTY MOSQUITO & VECTOR CONTROL

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January 20, 2016

Please note your case is set for a MSC on 3/21/16.

Finally, my client will be authorizing the testing and some of the consultations as recommended by Dr. Bronschvag. Those reports will then be provided to him in order for him to provide his final opinions on your case.

Thank you for your attention to the above.

Very truly yours,

STOCKWELL, HARRIS, WOOLVERTON & HELPHREY
A Professional Corporation



SARA A. SKOLNIK

SAS:dk

cc: Ms. Nancy Urton, AIMS Insurance
Mr. Eddie Lucchesi, San Joaquin County Mosquito & Vector Control
District

From: Tiffany Anderson <tiffanyanderson@me.com>

Date: Sunday, January 24, 2016 at 5:30 PM

To: <Sara_Skolnik@shwm.com>

Cc: Eddie Lucchesi <elucchesi@simosquito.org>, "Sheree@DIR Langenes" <slangenes@dir.ca.gov>

Subject: MSC Hearing 3-21-16

Sara-I am cleaning up my records and am following up with all of the correspondence you and your clients have ignored to comply with. I took the time to do the work and I expect better of a firm with multiple attorneys to allow so many mistakes to fall through cracks. I compiled the information and served all parties once as the document has a proof of service. Over the next month I will once again be resending all the filings you have not replied to through email and before our hearing I will provide a served copy to the judge a complete over view of my whole case.

I start with the document attached which was initiated by your offer to have your clients sign a affidavit testifying to that your clients did not speak to any of my physicians. You offered and have never fulfilled this offer.

The rest of the document is self explanatory. You and your clients need to be clear on who represents what and start answering theses questions.

I am resending this document and asking you to comply with the requests within it. It will be coming up on a year since it was

served to you. I will have a summery of all my claims and a spreadsheet of all documents perviously served to you along with all neglected workers comp compliances ready for our up coming hearing and served to all parties.

I respectfully request you and your clients get busy. This is the year we end my workers comp claims.

Your clients had 30 days from the date they were served 01-05-16 Request to inspect and copy employee file a ned a theme of ignoring my correspondence is the response I have received.

Sincerely,

XXXX

Tiffany Anderson

Tiffany Kay Anderson
2 N Avena Avenue
Lodi, CA 95240
209-625-8587

RECEIVED
STOCKTON

2015 APR -2 PM 12:19

OFFICE OF INDUSTRIAL RELATIONS
DWC/WCAB

April 2, 2015

Judge McGill
WCAB
31 East Channel Street, Room 344
Stockton, CA 95202

Regarding: Tiffany Anderson vs. San Joaquin County MVCD, AIMS Insurance
(Sacramento), ADJ7004221; ADJ7004227; ADJ7010682; ADJ7976768;
ADJ9066508

Dear Judge McGill:

Plaintiff is not opposed to the next hearing in these matters being turned into an MSC in that Plaintiff wants to move all of these claims along, and asks that the Court set aside sufficient time on its calendar to fully address the parties' efforts.

Enclosed please find the following numbered exhibits that I am submitting now as evidence for my above-referenced claims:

1. District Manager's Memo from 6/3/1998
2. Treatment records provided by the Defense (incomplete), followed by public record showing how the information can be compiled
3. CAL/OSHA Safety Order 3204
4. ATSDR formaldehyde information
5. California EPA's Pesticide Safety Information Series, A1 through A8
6. OSHA Regulations (Standards 29 CFR) 1910.1048 - particularly, Information Provided to the Physician
7. Helphrey/Allems conflict of interest and bias information
8. EPA Formaldehyde - Chronic Effects
9. Code of Federal Regulations Title 21, Section 529.1030 Formalin
10. Toxics Use Reduction Institute study
11. Department of Health and Human Services, Report on Carcinogens
12. OSHA Fact Sheet, Formaldehyde
13. MSDS label, Formalin
14. OSHA Form 300
15. Photos of knee
16. Photos of growth on scalp and lesions on chest and back
17. Documentation of Medical Records (Personal & Workers Comp Providers)
18. Employee Performance Evaluations of Tiffany Anderson
19. Eric Helphrey and Chris Ely Depositions (Note the Helphrey deposition will be submitted only to the court since Defendant has a copy)

- 20. Skelly hearing materials and harassment examples
- 21. Humphrey's College Information
- 22. Financial Losses-Medical
- 23. Photos of location where Plaintiff's injuries occurred

I am respectfully requesting that counsel for Defendant(s) have her clients complete the following table under penalty of perjury and return it to me on or before our next hearing on April 21, 2015:

Question/Request	Yes	No	Why or Why Not	What Steps Were Taken As A Result To Implement This
Prior Request #6 - Have all MSDS labels for chemical treatments at the White Slough facility for 2004 to 2011 been provided to the Plaintiff?				N/A
Prior Request #6 - Was Formalin used at the White Slough facility each year from 2004 to 2011?				N/A
Prior Request #6 - Were all employees who were sent out to the White Slough facility advised beforehand of the chemicals being applied there?				
Prior Request #7 - Do the Defendants acknowledge that the 6/3/1998 Memo Took Effect At The Time Of Its Issuance?				
Prior Request #8 - Do the Defendants acknowledge that the Agricultural and Municipal Waste Water Information binder was not provided to any of Plaintiff's treating				N/A

physicians at the time of her initial appointments?				
Prior Request #9 - Do the Defendants acknowledge that the safety leaflet N-8 published by the CA Dept. of Pesticide Regulation was not provided to any of Plaintiff's treating physicians?				N/A
Prior Request #9 - Do the Defendants acknowledge that the MSDS sheets for chemicals used by the District were not provided to any of Plaintiff's treating physicians?				N/A
Prior Request - Please have the Defendants provide copies of Sub Rosa reports every 30 days, documenting which claim they are reviewing				
New Request #1-Please have the Defendants provide reasoning for each of the claims they have denied, addressing each denied claim individually.				

Going forward, I respectfully request that each of my claims be kept separate, as many of the past discussions and discovery issues have been confusedly bundled together during QME evaluations, discovery, stipulations, correspondence and hearings.

I also respectfully request that sanctions be applied to the Defendants for bad faith efforts, withholding vital information, and intentionally causing undue delay in the review and acceptance of my claims.

Please note I have additional evidence for my claims in digital format, including timesheets, personal journals and Kaiser records that will be submitted in the future.

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 address is 2 N. Avena Avenue, Lodi, CA 95240.

I served the foregoing document described as: Plaintiff's Letter Submitting Exhibits 1-23 dated April 2, 2015, with Enclosures 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 Stockton, California, addressed as follows:

Attorney Sara Skolnik
Stockwell, Harris, Woolverton & Muehl
1545 River Park Drive, Suite 330
Sacramento, CA 95815-4616

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

Executed on April 2, 2015, at ~~Stockton~~ Lodi, California.

By: 

Tiffany Anderson

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:

1/26/2016 Letter to Judge Webber and all attachments, 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:

Sara Skolnik
Stockwell, Harris, Woolverton & Helphrey
1007 West College Ave. #301
Santa Rosa, CA 95401

Ms. Nancy Urton
AIMS Insurance (Sacramento)
P.O. Box 269120
Sacramento, CA 95826-91201

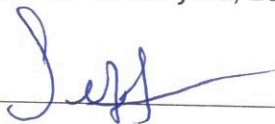
Khoshrow Tabaddor
8221 N. Fresno Street
Fresno, CA 93720

Dr. Michael Broshvag
11010 White Rock Rd., Ste. 120
Rancho Cordova, CA 95670

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

Executed on January 26, 2016, at Lodi, California.

By: _____



Tiffany Anderson