

1 Sara A. Skolnik (SBN: 267324)
2 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**
3 **A Professional Corporation**
4 1545 River Park Drive Ste. 330
5 Sacramento, CA 95815
6 (916) 924-1862
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8 Attorneys for Defendant

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BEFORE THE WORKERS' COMPENSATION APPEALS BOARD
OF THE STATE OF CALIFORNIA

Tiffany Anderson,)	WCAB No.: 1) ADJ7004221; 2) ADJ7004227;
)	3) ADJ7010682; 4) ADJ7976768; 5)
Applicant,)	ADJ9066508
vs.)	
)	PETITION TO COMPEL ATTENDANCE
San Joaquin County MVCD; AIMS Insurance)	AT PQME WITH DR. TABADDOR ON
(Sacramento),)	1/18/2016
)	
Defendant.)	

COMES NOW, defendant, San Joaquin County MVCD; AIMS Insurance, by and through their attorney of record, Stockwell, Harris, Woolverton & Muehl, and files this Petition to Compel the applicant to attend the PQME re-evaluation with Dr. Tabaddor. In support of this Petition defendant offers the following:

1. The applicant was scheduled to be re-evaluated by Dr. Tabaddor for a Petition to Reopen on October 13, 2014.
2. At an Information and Assistance Conference on October 3, 2014, the applicant agreed that she would attend the re-evaluation.
3. The applicant failed to attend an informal conference set with Judge McGill for October 7, 2014.
4. On October 13, 2014, Dr. Tabaddor's office advised that the applicant appeared for the evaluation but refused to be evaluated and left the appointment.

1 5. Defendant rescheduled the evaluation to January 5, 2015 and petitioned
2 for an Order Compelling. The Order was granted on January 5, 2015.

3 6. The applicant obtained an Order staying the proceedings for unrelated
4 reasons so this appointment did not go forward.

5 7. Defendant rescheduled the evaluation for September 21, 2015 and
6 petitioned for an Order Compelling.

7 8. The Order Compelling issued on July 21, 2015 and defendant served the
8 applicant with same on July 27, 2015.

9 9. On September 21, 2015, the applicant e-mailed the defense attorney. Also
10 on the e-mail was an employer representative whom the applicant has been told
11 numerous times not to copy with her correspondence as the client is represented. In this
12 e-mail, the applicant claimed that Dr. Tabaddor did not need her present and would not
13 do his job and that the defendant was withholding relevant records. The applicant
14 demanded that the appointment be rescheduled. She further requested that Dr. Tabaddor
15 appear at the courthouse for her to answer his questions and that she did not feel safe
16 going back to his Stockton office.

17 10. Defendant rescheduled the PQME Evaluation for November 30, 2015.
18 Defendant filed a Petition to Compel Attendance at this evaluation on 10/6/15. The
19 Order Compelling same issued on 10/14/15. Unfortunately, Dr. Tabaddor had to cancel
20 the evaluation for his own reasons. It has now been rescheduled for 1/18/16, and
21 defendant seeks an additional Order Compelling same pursuant to the original Order
22 Compelling.

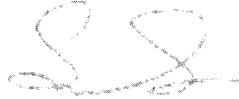
23 11. Additionally, defendant notes that the applicant's benefits have been suspended
24 until she fully participates with discovery, and petitions for an Order Reinstating
25 Benefits. This Order Suspending issued on 11/2/15. Her attendance at this PQME is
26 necessary for her to comply with this Order.

27 Defendant therefore petitions for an Order compelling the applicant to attend the
28 PQME with Dr. Tabaddor on January 18, 2016.

1 I declare under penalty of perjury that the foregoing is true and correct to the best
2 of my knowledge.

3
4 Dated: December 30, 2015 Respectfully submitted,

5 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**
6 A Professional Corporation

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9 _____
Sara A. Skolnik

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11 cc: Please see proof of Service/Verification

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BEFORE THE WORKERS' COMPENSATION APPEALS BOARD
OF THE STATE OF CALIFORNIA

Tiffany Anderson,)	WCAB No.: 1) ADJ7004221; 2) ADJ7004227;
)	3) ADJ7010682; 4) ADJ7976768;
)	5) ADJ9066508
Applicant,)	
vs.)	
)	ORDER COMPELLING APPLICANT'S
San Joaquin County MVCD; AIMS Insurance)	ATTENDANCE AT PQME EVALUATION
(Sacramento),)	
)	
Defendant.)	
)	

Pursuant to defendant's Petition to Compel applicant's attendance at the PQME re-evaluation, and good cause appearing,

IT IS ORDERED that applicant, Tiffany Anderson, present herself for a re-evaluation with Dr. Tabaddor on January 18, 2016. at 333 San Carlos Way, Suite B, Stockton, California 95207.

Dated: _____
WORKERS' COMPENSATION JUDGE

Uniform Assigned Name: STOCKWELL HARRIS SACRAMENTO
EAMS Administrator Name: KALIE WIKEL
EAMS Administrator's Phone: (916) 924-1862
EAMS Administrator's Email: Kalie_Wikel@shwm.com

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

4 WCAB NO.: 1) ADJ7004221; 2) ADJ7004227; 3)
5 ADJ7010682; 4) ADJ7976768; 5) ADJ9066508
6 CLAIM NO.: VE0700184
7 OUR FILE NO.: 300141-040

8 **VERIFICATION**

9 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

10 I have read the foregoing **PETITION TO COMPEL ATTENDANCE AT PQME WITH DR.**
11 **TABADDOR ON 1/18/2016 AND PROPOSED ORDER** and know its contents.

12 I am one of the attorneys for a party to this action. I am informed and believe and on that ground
13 allege that the matters stated in the foregoing document are true.

14 Executed on January 4, 2016, at Sacramento, California.

15 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and
16 correct.

17 

18 _____
Sara A. Skolnik

19 **PROOF OF SERVICE**

20 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

21 I am in the County of Sacramento, State of California. I am over the age of 18 years and not a party to
22 the within action. My business address is 1545 River Park Drive, Suite 330, Sacramento, California 95815-4616.

23 On January 4, 2016, I served the foregoing document described as: **PETITION TO COMPEL**
24 **ATTENDANCE AT PQME WITH DR. TABADDOR ON 1/18/2016 AND PROPOSED ORDER** on all
25 interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon
26 fully prepaid in the United States mailed at Sacramento, California, addressed as follows:

Uniform Assigned Name: STOCKWELL HARRIS SACRAMENTO

EAMS Administrator Name: KALIE WIKEL

EAMS Administrator's Phone: (916) 924-1862

EAMS Administrator's Email: Kalie_Wikel@shwm.com

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WORKERS' COMPENSATION APPEALS BOARD (STOCKTON)

31 E. CHANNEL STREET, ROOM 344

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STOCKTON, CA 95202

E-File

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ARS LEGAL

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13925 WHITTIER BOULEVARD

WHITTIER, CA 90605

6

MS. NANCY URTON

7

AIMS INSURANCE

P.O. BOX 269120

8

SACRAMENTO, CA 95826-9120

9

MS. TIFFANY ANDERSON

1900 LAKESHORE DRIVE

LODI, CA 95242

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

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

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By: Heidi Valentine

Heidi Valentine

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