

1 Sara A. Skolnik (SBN: 267324)
2 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**
3 **A Professional Corporation**
4 1545 River Park Drive, Suite 330
5 Sacramento, California 95815-4616
6 (916) 924-1862
7 (916) 924-3541 Fax

8 Attorneys for Defendant

9
10 **BEFORE THE WORKERS' COMPENSATION APPEALS BOARD**
11 **OF THE STATE OF CALIFORNIA**

12 Tiffany Anderson,) WCAB No.: 1) ADJ7004221; 2) ADJ7004227;
13) 3) ADJ7010682; 4) ADJ7976768;
14 Applicant,) 5) ADJ9066508
15 vs.)
16) **PETITION TO COMPEL ATTENDANCE**
17 San Joaquin County MVCD; AIMS Insurance) **AT PQME EVALUATION**
18 (Sacramento),)
19)
20 Defendant.)

21 COMES NOW, defendant, San Joaquin County Mosquito and Vector Control and
22 Acclamation Insurance Management Services (AIMS), by and through its attorney of
23 record, Stockwell, Harris, Woolverton & Muehl, and hereby petitions the Workers'
24 Compensation Appeals Board for an order compelling the applicant to attend her PQME
25 re-evaluation scheduled for September 21, 2015 at 4:00 p.m. with Dr. Tabaddor. In
26 support of this Petition, defendant alleges the following:

27 1. The applicant was scheduled to be re-evaluated by Dr. Tabaddor for a
28 Petition to Reopen on October 13, 2014.

1. An Information and Assistance Conference was held on October 3, 2014.
At that conference and as memorialized by the Information and Assistance Officer,
applicant agreed that she would attend the re-evaluation.

1 3. An informal conference was then set for October 7, 2014 with Judge
2 McGill. However, the applicant failed to attend.

3 4. On October 13, 2014 Dr. Tabaddor's office was advised that the applicant
4 did appear for the evaluation but refused to let Dr. Tabaddor evaluate her and left the
5 appointment.

6 5. Defendant then re-scheduled the evaluation to January 5, 2015. Defendant
7 petitioned for an Order Compelling and such was granted by Judge McGill by way of an
8 Order served on 1/5/15.

9 6. The applicant applied for and obtained an Order Staying the proceeding
10 which issued on 1/9/15.

11 7. Defendant has now re-scheduled the re-evaluation to September 21, 2015,
12 and hereby reinstates its Petition to Compel the applicant's attendance at same. (Please
13 see QME appointment notification form attached hereto.)

14 WHEREFORE, defendant respectfully requests that this Board issue an Order
15 Compelling applicant to attend the re-evaluation with Dr. Tabaddor scheduled for
16 September 21, 2015 at 4:00 p.m.

17
18 Dated: July 9, 2015

Respectfully submitted,

19 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**
20 A Professional Corporation

21 _____
Sara A. Skolnik

22 **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 September 21, 2015 at 4:00 p.m. 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@shww.com

1
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**

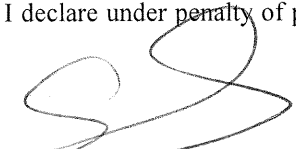
9 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

10 I have read the foregoing **PETITION TO COMPEL ATTENDANCE AT PQME EVALUATION**
11 **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 July 10, 2015, 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 _____
19 SARA SKOLNIK

20 **PROOF OF SERVICE**

21 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

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

24 On July 10, 2015, I served the foregoing document described as: **PETITION TO COMPEL**
25 **ATTENDANCE AT PQME EVALUATION AND PROPOSED ORDER** on all interested parties in this action
26 by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United
27 States mailed at Sacramento, California, addressed as follows:

28 Workers' Compensation Appeals Board (Stockton)
31 E. Channel Street, Room 344
Stockton, CA 95202
E-FILE

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

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ARS Legal
13925 Whittier Boulevard
Whittier, CA 90605

Mr. David Gutierrez
AIMS Insurance (Sacramento)
P.O. Box 269120
Sacramento, CA 95826-9120

Ms. Tiffany Anderson
2 N. Avena Ave
Lodi, CA 95240

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

Executed on July 10, 2015, at Sacramento, California.

By: Heidi Valentine
Heidi Valentine