

September 12, 2014

pages: 1) Medical Examination Report dated 4/2/04; 2) Medical Examination Report dated 4/19/04; 3) Medical Clearance for Respirator Use dated 4/19/04.

Request # 2: All records for medical encounters at Dameron Occupational Health for dates of service 6/9/04, 1/26/05, and 11/1/05.

Response:

Enclosed are the following: 1) Claim form dated 6/8/04, corresponding Form 5020, Work Status Report dated 6/9/04; 2) Claim Form dated 1/26/05, corresponding Form 5020, Examination/Treatment record dated 1/26/05, Work Status Report dated 1/26/05; Work Status Report dated 1/27/05, Work Status Report dated 1/31/05, and Work Status Report dated 2/7/05; 3) Claim Form for date of injury 10/11/05, corresponding Form 5020, and Work Status Report dated 10/25/05. Please note there is no date of service 11/1/05. Date of service 10/25/05 was the only one.

Request #3: Copies of all DWC-1s.

Response:

These have already been provided to you. If there are any specific DWC-1s you feel have not been provided at this point, please list them with specificity.

Request #4: Documentation of any verbal instructions and comments between district/fellow employees/supervisors and the doctor/medical staff.

Response:

There were no verbal instructions between staff, doctor, or employees transcribed. If needed, the employer can provide an affidavit to this effect.

Request #5: All medical records, lab results, reports, evaluation, notes written or transcribed.

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Response:

I have previously provided you with the entire medical file as well as everything I have from Dameron Occupational. You specifically requested laboratory results around March of 2005. The employer does not have any medical records, lab results, evaluations, or notes from that time period.

Request #6: Labels and chemical treatment records from 2000 to 2010, specifically the use of Formalin and other materials at the White Slough Facility along with documentation that all employees have been notified of the use of the substances.

Response:

I have already provided you with the MSDS labels. As for chemical treatment records, we are providing records from 2004 through 2011 (your dates of employment.) Please note there is only one entry where you participated in the treatment (sludge control) and that is January 20, 2004. All entries identify the product used via two letter code, and the applicator is identified by the employee number. Your number is 306. As for documentation of notification to all employees, the employer does not have this and further will not provide records related to other employees unless ordered to by the WCAB.

Request #7: A copy of the memo from John Stroh dated 6/3/98 entitled "Employee Waste Water Handling Information Update."

Response:

You already have this. You yourself gave me a copy so I will assume this request has been satisfied.

Request #8: A copy of the training binder titled "Agricultural and Municipal Waste Water Information."

Response:

This has already been provided to you. In the abundance of causation I am providing another copy of the contents herein.

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Request #9: A copy of safety leaflet N-8 published by the California Department of Pesticide Regulation.

Response:

This is enclosed.

Request #10: Copies of documentation of your training and education records including her signed acknowledgement of same from her date of hire through her termination.

Response:

Your training records are enclosed.

Request #11: Copies of your time sheets.

Response:

These have already been provided multiple times and I will assume until further notice that this request has been satisfied.

Please note this is Defendant's "Initial Response." Further, I note your most recent correspondence dated September 9, 2014, wherein you reiterate some of these requests and make additional requests. We can discuss this further at the Status Conference on October 3, 2014 at 10:00 a.m. Some of the items requested have already been provided.

Additionally, please note that Defendant contests your request to replace Dr. Allems as PQME. The presentation to which you refer was hosted by a non-profit agency and was open to the public. We can discuss this further with the Judge at the Status Conference.

Further, please note that any additional requests for production of documents, or any other requests requiring any response by Defendant, must be served by mail in accordance with the California Code of Civil Procedure.

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

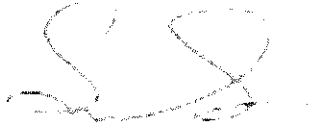
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Thank you for your attention to the above.

Very truly yours,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL
A Professional Corporation

A handwritten signature in black ink, appearing to read 'SAS', with a stylized flourish at the end.

SARA A. SKOLNIK

SAS:ma

Enclosures: Listed above

cc: See attached Proof of Service

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

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

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

I served the foregoing document described as: **Letter to Applicant, Tiffany Anderson, dated September 12, 2014 with Enclosures** on all interested 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 Sacramento, California, addressed as follows:

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

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

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

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

Executed on September 12, 2014, at Sacramento, California.

By: 
Michelle Anderson