

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

13 Tiffany Anderson,) WCAB No.: 1) ADJ7004221; 2) ADJ7004227;
14) 3) ADJ7010682; 4) ADJ7976768; 5)
15 Applicant,) ADJ9066508
16 vs.)
17) **PETITION TO COMPEL ATTENDANCE**
18 San Joaquin County MVCD; AIMS Insurance) **FOR PQME WITH DR. TABADDOR ON**
19 (Sacramento),) **NOVEMBER 30, 2015**
20)
21)
22 Defendant.)

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

1 4. On October 13, 2014, Dr. Tabaddor's office advised that the applicant
2 appeared for the evaluation but refused to be evaluated and left the appointment.

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

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

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

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

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

19 Defendant has now rescheduled the PQME evaluation for November 30, 2015.
20 By the time of the appointment, it will have been over a year from the initial date of the
21 reevaluation appointment.

22 The applicant has violated an Order issued by the judge, of which she was well
23 aware. Her actions are causing undo delay and expenses on behalf of defendant.

1 Defendant hereby petitions for an Order Compelling the applicant to attend the
2 PQME with Dr. Tabaddor on November 30, 2015.

3 I declare under penalty of perjury that the foregoing is true and correct to the best
4 of my knowledge.
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6
7 Dated: October 7, 2015 Respectfully submitted,

8 **STOCKWELL, HARRIS, WOOLVERTON & MUEHL**
9 A Professional Corporation

10 
11 _____
12 Sara A. Skolnik

13 cc: Please see Proof of Service/Verification
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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

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 APPLICANT'S ATTENDANCE AT**
11 **MEDICAL EVALUATION** 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 October 7, 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 A. 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 October 7, 2015, I served the foregoing document described as: **PETITION TO COMPEL**
25 **APPLICANT'S ATTENDANCE AT MEDICAL EVALUATION** on all interested parties in this action by
26 placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States
27 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@shwm.com

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MS. TIFFANY ANDERSON
2120 W. PINE ST.
LODI, CA 95242

Ms. Nancy Urton
AIMS Insurance
P.O. Box 269120
Sacramento, CA 95826-9120

ARS LEGAL WHITTIER
13925 WHITTIER BLVD
WHITTIER CA 90605

CHRISTOPHER ELEY STOCKTON
343 E MAIN ST STE 710
STOCKTON CA 95202

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

Executed on October 7, 2015, at Sacramento, California.

By: Heidi Valentine
Heidi Valentine