

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

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

19 COMES NOW, defendant, San Joaquin County Mosquito & Vector Control and
20 Acclamation Insurance Management Services (AIMS), by and through its attorneys of
21 Record, Stockwell, Harris, Woolverton and Muehl, and hereby Petitions the Workers'
22 Compensation Appeals Board for an Order compelling applicant to attend her PQME re-
23 evaluation scheduled for January 5, 2015 at 3:30 p.m. with Dr. Tabaddor. In support of this
24 Petition, defendant alleges the following:

- 25 1. Applicant was scheduled to be re-evaluated by Dr. Tabaddor for a Petition to
26 Reopen on October 13, 2014.
- 27 2. An Information and Assistance Conference was held on October 3, 2014. At that
28 conference and as memorialized by the Information and Assistance Officer, applicant agreed
that she would attend the re-evaluation.

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

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

5. Defendant has now rescheduled the evaluation for January 5, 2015 at 3:30 p.m.

WHEREFORE, defendant respectfully requests that this Board issue an Order compelling applicant to attend the re-evaluation with Dr. Tabaddor scheduled for January 5, 2014 at 3:30 p.m.

Dated: October 26, 2014 Respectfully submitted,

STOCKWELL, HARRIS, WOOLVERTON & MUEHL
A Professional Corporation



Sara A. Skolnik

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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VERIFICATION

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

I have read the foregoing PETITION TO COMPEL APPLICANT'S ATTENDANCE AT
PQME EVALUATION; PROPOSED ORDER and know its contents.

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

Executed on October 29, 2014, at Sacramento, California.

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



Sara A. Skolnik

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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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: **PETITION TO COMPEL APPLICANT'S ATTENDANCE AT PQME EVALUATION; PROPOSED ORDER** 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

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

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

Mr. Eddie Lucchesi
San Joaquin County Mosquito & Vector Control District
7759 S. Airport Way
Stockton, CA 95206

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

Executed on October 21 2014, at Sacramento, California.

By: Michelle Anderson
Michelle Anderson