

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

December 2, 2013

AIMS
P.O. Box 269120
Sacramento, CA 95826

Manager Eddie Lucchesi
Central Office, Mosquito Abatement
7759 South Airport Way
Stockton, CA 95206

Stockwell Harris Woolverton Muehl
1545 River Park Drive, Suite 330
Sacramento, CA 95815-4616

Regarding: Tiffany Anderson vs. San Joaquin County Mosquito and
Vector Control District
DOI: 06/19/2008, 03/26/2009, 07/02/2009, 06/29/2011
EAMS No.: ADJ
WCAB No.: ADJ7004221, ADJ7004227, ADJ7010682, ADJ7976768
Claim No.: VE0700184

Dear AIMS, et al.:

I am writing you today in regards to my workers' compensation case. I am currently self-represented. I hereby renew and expand upon the prior request of October 5, 2009, from my then-attorney Ronald Stein. I do not see any documentary response from AIMS to that letter of over four years ago. I am therefore re-requesting the following.

I would appreciate your sending me a list of all chiropractors and physicians in your Medical Provider Network located within 25 miles of Lodi, California.

Please forward all medical reports to my address listed above within 20 days or I can have a copy service obtain the medicals and bill the insurance company.

A Continuing Demand is hereby made for the following, and I will object to any deposition or closing of discovery if this information is not first forwarded to my address listed above.

RECEIVED

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**DIVISION OF WORKERS COMPENSATION
STOCKTON OFFICE**

1. A copy of your entire medical file on all claimed injuries whether they pertain to the current claim or a prior claim as far back as 2003.
2. A copy of all of your claim files including notes and documentation related to provision, delay or denial of benefits, including any electronically stored documentation notes and documentation evidencing the legal, factual, or medical basis for non-payment or delay in payment of benefits, and notes describing telephone conversations relating to the claim which are of significance to claim handling, including dates of calls, substance of calls, and identification of parties to the calls. Also, any file notes including the adjustors notes, reserve information, information regarding sub rosa investigations, e-mail communications, between the claims adjustor and anyone, including but not limited to, the claims supervisor and the nurse case manager.
3. A copy of the nurse case manager's notes, reports and correspondence, whether written or by email and/or any of the nurse case managers notes and/or email transmissions sent to the claims adjustor, the treating physician, and/or sent or transmitted to the nurse case managers supervisor and/or sent or transmitted to any person working for the insurance company, and/or the employer.
4. And and all sub rosa videotapes, film or movies of Tiffany Anderson, whether accusatory or exculpatory, undertaken by either AIMS or by Mosquito Abatement or any of their agents or employees acting at their direction, and listed as such.
5. A copy of all witness, employee or employer statements, all letters and/or correspondence you, your company, your attorney and/or Mosquito Abatement may have sent to Tiffany Anderson and/or doctor including but not limited to any QME and all medical reports, regarding this case. We want all letters whether incriminating and/or exculpatory of Tiffany Anderson.
6. I also demand any documentation establishing your continued contacts with any doctor who has treated Tiffany Anderson.
7. A computer printout of all benefits paid to Tiffany Anderson.
8. A copy of Tiffany Anderson's wage statement from Mosquito Abatement.
9. Any documents that establish that the investigation complied with Title 8, Section 10109, duty to conduct good faith investigation.

The above demands are continuing demands to be renewed every 30 days until this claim is settled or submitted for decision.

Finally, if you are of the opinion that AMA guidelines are applicable to this case then pursuant to Labor Code Section 4660, the applicant's future diminished earnings capacity must be identified when calculating permanent disability.

The applicant hereby objects to any methodology to measure applicant's future diminished earnings capacity that does not meet the requirements of Labor Code Section 4660, including but not limited to the Permanent Disability Rating Schedule. The applicant hereby proposes that the parties utilize an Agreed Diminished Future Earnings Capacity expert (DFEC) to assist in the calculation of the applicant's permanent disability and the loss of future earning capacity in the above-referenced cases and to save costs. The applicant proposes:

Lisa Suhonos, M.S., C.D.M.S., A.B.V.E.
Sohonos' Occupational Services, Inc.
6056 Rutland Drive # 6
Carmichael, CA 95608
(916) 349-9300

Eugene Van de Bittner Ph.D., CRC
Mirfak Associates, Inc.
577 Ygnacio Valley Road
Walnut Creek, CA 94596-3801
(925) 296-0300

If the applicant goes to an Agreed Diminished Future Earnings Capacity expert (DFEC), you will be notified and will have the opportunity to cross-examine the DFEC expert. I would request the same return courtesy.

You continued cooperation with me is greatly appreciated.

Sincerely,

Tiffany Anderson



copy:

Workers' Compensation Appeals
31 E. Channel Street, Room 344
Stockton, CA 95202

