

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 FOR SANCTIONS AND**  
18 San Joaquin County MVCD; AIMS Insurance ) **COSTS**  
19 (Sacramento), )  
20 )  
21 Defendant. )

22 COMES NOW, defendant, San Joaquin County MVCD; AIMS Insurance, by and  
23 through their attorney of record, Stockwell, Harris, Woolverton & Muehl, and files this  
24 Petition for Sanctions and Costs under Labor Code §5813. In support of this Petition  
25 defendant offers the following:  
26

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

1. 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           In light of the above, the applicant has violated an Order issued by the Judge, of  
20 which she was well aware. Her actions prevent her case from moving forward and are  
21 clearly frivolous and solely intended to cause unnecessary delay. In addition, the  
22 defendant has had to pay for multiple no-show and/or late cancellation fees associated  
23 with these evaluations.

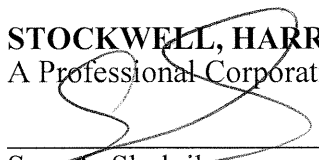
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Defendant hereby petitions for sanctions under Labor Code §5813, as well as costs to include any no-show/late cancellation fees from the PQME as well as defense legal expenses in pursuing the various Orders Compelling.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 23, 2015    Respectfully submitted,

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



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Sara A. Skolnik

## Sara Skolnik

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**From:** Tiffany Anderson <tiffanyanderson@icloud.com>  
**Sent:** Monday, September 21, 2015 11:12 AM  
**To:** Sara Skolnik; Eric Helphrey; Eddie Lucchesi  
**Cc:** Sheree@DIR Langenes  
**Subject:** PQME reschedule request for todays cancellation  
**Attachments:** Deaths 2009-2015.pdf

Sara-

I am traumatized after my October 13, 2014 appointment you scheduled for me. Dr Tabaddor asked me to leave. Dr Tabaddor ignores everything I say to him. Please reschedule this appointment today. Dr Tabaddor does not need me present. He needs to do his job and demand my records you are withholding that answer the 9 page questionnaire he wants me to answer when doctor filling document while assessing me. 2010 to 2015 Dr Tabaddor has neglected to do his job.

Reschedule the appointment and inform me of cost.

Can Tabaddor meet us at the courthouse where I can answer his questions? I do not feel safe going back to his Stockton office.

Sincerely

Tiffany Anderson

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This email has been scanned by the Symantec Email Security.cloud service.

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EXHIBIT A

names during 2009-2015			
e Bridgewater	supervisor	attended	Formalin used at work without consent or knowledge he died 9 months after retirement
lie Berry	cousin	could not attend	I couldn't get to Reno for a year due to 6/29/11 injury and the death of Shirley and Mary's medical needs. Family doesn't talk to me.
ey Hazel Johnson Trust	matriarch	attended	Mary & I requested Freund to release her home for hospice care. I am co trustee with MaryJean. Family conflict over the Shirley Hazel Johnson Trust.
ine Plines	cousin	could not attend	UCSF Double lung rejection. Estranged from family resulting over the Shirley Hazel Johnson Trust.
ys Hope (Schmeierer) son	aunt	could not attend	Mary fell getting the car at home the fire department had to pick her up and we stayed home
hall Johnson	grandpa	could not attend	Mary and mom are hospitalized
ence Lester Schmierer	uncle	could not attend	One of my favorite uncles
s (Schmeierer) Amburn	aunt	could not attend	Mom tests needed me to pick grandma up from dialysis
tta Jeffries	friend	could not attend	Loretta was staying with me supporting me on my first trip to UCSF for mom and was helping with Mary's care
i Bridgewater	friend	attended	Her husband was my boss they left behind a son Jake
Jean Parvin Trust	cousin	I held the service	I was renting a room from my cousin Mary and I couldn't leave her. She was alone with medical mental diagnosis. Conflict with father and mother families no support each side expected me to do more than physically possible.
hanie Anne Ebel	mom	attended	I prayed with her the last day I was with her. My grandma wouldn't let me stay. Conflict with family over Shirley Hazel Johnson and MaryJean Parvin Trust
one Rae (Ebel) Fischer	aunt	could not attend	Died peacefully. I got to pray with her and say good bye. Family conflict over the Shirley Hazel Johnson and MaryJean Parvin Trust

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 FOR SANCTIONS AND COSTS** and know its contents.

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

13 Executed on 9/23/15, at Sacramento, California.

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

16   
17 SARA SKOLNIK

18 **PROOF OF SERVICE**

19 **STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

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

22 On September 23, 2015, I served the foregoing document described as: **PETITION FOR SANCTIONS**  
23 **AND COSTS** on all interested parties in this action by placing a true copy thereof enclosed in a sealed envelope  
24 with postage thereon fully prepaid in the United States mailed at Sacramento, California, addressed as follows:

25 Workers' Compensation Appeals Board (Stockton)  
26 31 E. Channel Street, Room 344  
27 Stockton, CA 95202»  
28 \*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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ARS Legal (Whittier)  
13925 Whittier Boulevard  
Whittier, CA 90605

Ms. Nancy Urton  
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 September 23, 2015, at Sacramento, California.

By: Heidi Valentine  
Heidi Valentine